

Pet Insurance

1. Protecting your privacy

The privacy of your personal information is very important to Pet Health Insurance Services Pty Limited (ABN 59 638 910 675) (PHIS), Auto & General Insurance Company Limited (ACN 111 586 353) (AGIC) and ING Bank (Australia) Limited ABN 24 000 893 292 trading as ING ("ING") and each of PHIS, AGIC and ING is "we", "us" or "our".

This Privacy Policy contains important information about the type of personal information we collect, the purposes for which it is used, how it is managed, to whom we disclose it and what measures we take to comply with privacy laws. It applies to anyone who deals with us, or anyone we collect personal information from or about.

The way in which we handle your personal information is subject to protections under the Privacy Act 1988 (Cth) ("Privacy Act") and the Australian Privacy Principles contained therein, and we are committed to complying with our obligations. The privacy of your personal information is very important to us.

We may make changes to this Privacy Policy from time to time for any reason. We will publish changes to this Privacy Policy on our websites.

As a customer of ING, the terms of ING's Privacy Policy will also apply to how ING handles your personal information. ING's Privacy Policy includes, amongst other things, an explanation of the additional information ING may collect about you and how it may be used. This can be found at ing.com.au/privacy.html

It is important that you read and understand the Privacy Policies.

2. What personal information we collect

We collect, hold, use and disclose personal information that is relevant to providing insurance products and services.

The personal information we collect and store about you may include:

- your name;
- contact details (including address, phone number and email);
- claims history;
- payment details;
- information about a claim (where you may be the policy holder making the claim or a third party connected to a claim); or
- your professional details (if you interact with us in a professional capacity, such as a veterinarian).

and such other information which is relevant and necessary to providing products and delivering our services, and dealing with pet service providers in relation to an insurance policy or to comply with the law.

We may also collect personal information about other people such as those noted on your insurance policies from you. Where you provide us with personal information about other people you must have their consent to do this, and to provide it on their behalf. If you do not have their consent, you must tell us. Where you provide information to us about other people, you must make sure they know you have done this, and agree to us processing their information as set out in this policy and notice. You also need to tell them how to find a copy of this policy and notice.

We may also collect information about you from other third parties (see 'Collecting personal information from third parties' below for more information).

Sensitive Information

"Sensitive Information" is a subcategory of personal information which may include information or opinion about an individual. We may receive sensitive information from a veterinary service provider during the claim process. If we are in receipt of sensitive information, it will be protected in accordance with the Australian Privacy Principles.



3. Why we collect personal information

We will inform you of the main reasons for collecting your personal information at the time we request it. The purposes for which we will generally collect and use your information include:

- considering any application you make to us (including to process your application in compliance with regulatory requirements, to make a customer eligibility assessment for a product, and to conduct checks to help us comply with our regulatory obligations and manage our regulatory risks);
- providing products and services to you;
- performing administrative functions;
- claims management (including investigative processes, dispute resolution and settlement);
- loyalty programs;
- enhancing our products and services and telling you about our other products and services and our business partner's products and services. You may tell us at any time that you do not want us to advise you about other products and services (see Direct Marketing Opt Out below for more details); and
- any other uses for which you have given consent.

If you do not provide us this information, we may be unable to provide certain insurance products or services.

4. How we collect personal information

We collect information from you in various ways, such as through telephone calls with our contact centres or other employees, over the internet if you transact with us online, or when you fill out a quote or application form for one of our products or services online or via social media, or in person during the investigation phase of a claim. We may also collect information through our third party service providers or partners.

Information collected online

We collect information about visitors using our digital platforms. Any information collected is used to provide our products and services and to identify online behavioural patterns.

Our digital platforms include, but are not limited to websites, emails & messaging and mobile applications. Information collected by these resources may include the following information:

- server address/IP address;
- date and time of interactions with our site;
- pages visited;
- pages and information downloaded (including pages, images and data);
- the site you visited prior to visiting our website where you clicked through a direct link;
- your internet browser and information about your computer;
- tracking user preferences;
- location data; and
- your interactions with our platforms.

From time to time, we and third parties such as our partners may use data collection devices such as cookies, pixels or web beacons in conjunction with our digital platforms.

Data collection devices are used for various purposes such as:

- to provide you with better and more customised service and a more effective website;
- marketing measurement, personalisation and targeting; or
- collecting statistical information on things such as how many visitors our sites receive, how those visitors use the sites and where they came from.

Cookies are a small file placed onto a computer by a server. A cookie can later be identified by a server. Most of our digital platforms use sessions and/or cookies. If you wish, you can configure your browser so it does not accept cookies, but this may affect the functionality of the website.

For more information on ING, please see the ING Cookie Statement.



Collecting personal information from third parties

Where possible, we collect personal information directly from you. However, in some circumstances we may also collect personal information about you, or about other people noted on the policy (if applicable), from other sources so that we can provide you with a more personalised service, issue a policy, manage or investigate a claim, or claims recoveries.

For example:

- if you apply for a product through an intermediary, business partner or other distributor, that third party will disclose your personal information to us; or
- when determining the acceptability of a policy, the price of a policy, or when investigating, assessing and paying claims, third parties such as other insurers, the third parties listed in the Disclosure to third parties section below, or veterinary service providers may disclose your personal information to us; or
- persons authorised on your policy, joint policy holders, or persons with a power of attorney may disclose your personal information to us; or
- we may obtain information from public digital platforms and databases including Detective Desk, social media platforms, Court Database Australia, RP data, TICA, Pipl, Motorweb, CITEC and ASIC; or
- To provide you with an indicative quote for additional products that we offer.

If we receive unsolicited information about you from a third party and it is not information we could have collected in line with this Privacy Policy, we will destroy or de-identify that information (provided it is lawful to do so).

5. Dealing with us anonymously or using a pseudonym

Where possible, you have the option of interacting with us anonymously or pseudonymously. Whilst you are entitled to interact with us anonymously or by using a pseudonym, we may need to know who you are in order to provide you with our products and services.

6. Use of information

We use your personal information in accordance with the Australian Privacy Principles. We use the personal information collected for a number of purposes, such as:

- assessing your policy application (including to make a customer eligibility assessment for the policy);
- establishing and administering your policy (including preparing reports that we disclose to ING);
- processing premiums and payments;
- improving and assessing the way we provide our products and services;
- producing policy schedules and other mail related services;
- assessing, processing and investigating any insurance risks, including your claims history, claims, claims recoveries or complaints;
- assessing risks and underwriting insurance;
- training our employees, agents, representatives;
- conducting checks to help us comply with our regulatory obligations and manage our regulatory risks;
- administering loyalty programs;
- where you hold multiple policies or are a person named on a separate policy, information may be recorded against the other policies. Should you have any concerns (including but not limited to safety concerns) relating to sharing this information across policies, please inform our contact centre;
- the administration of agreements to which you or we are a party and to assess compliance with them and benchmark performance;
- to assist with audits, reviews, investigations or enquiries concerning goods or services supplied by us or to you or otherwise;
- the administration, management or improvement of business;
- for data analytics and market research;
- to exercise, enforce, take lawful action in respect of, secure or perfect any right or agreement;
- to ask about your experiences with or impressions of goods or services supplied by us or to you or in respect of which you have made enquiries;
- to communicate with you (or to disclose your personal information to third parties so they may communicate with you), by way of direct marketing, information about our goods or services or those of our business partners. Should you purchase products or services on our business partner websites, their privacy policy will apply to those products and services; and
- to share between our related bodies corporate for any of these purposes.



Direct marketing opt out

If you do not want to receive any marketing offers, you can choose to opt out of our marketing activities. To opt out, you can either:

- use the unsubscribe function from our emails, SMS, MMS or IM; or
- contact us using the Contact Details below.

You can, however, change your mind about opting out of receiving information about our products and services at any time by contacting us using our Contact Details noted below.

7. Disclosure to other parties

The personal information that we collect from you may be disclosed between us and also to other parties who are involved with the provision of our products and services. Such parties may include your insurer (AGIC), any insurance intermediary involved in the transaction, your vet or veterinary practice, service providers such as those that help us to conduct screening and checks that help us comply with our regulatory obligations and manage our regulatory obligations and manage our regulatory risks, claims assessors, investigators or lawyers (should they be required in the event of a claim) other insurers (for the purpose of seeking claims recoveries or to assist them to assess insurance risks), our loyalty program partners, or our marketing partners. We may also disclose your personal information to persons authorised on your policy, joint policy holders and persons with a power of attorney.

During the assessment and investigation phase of the claims process, we may also collect and disclose your personal information to various third parties in order to validate the claim. Examples of these third parties include but are not limited to law enforcement, private investigators acting on our behalf and/or third parties connected to the claim such as veterinarians, assessors, or any other third party/individual who may be able to assist in providing information about the claim.

We may disclose your information to various law enforcement agencies if required, including legal, regulatory, government and tax authorities in Australia or overseas, or anyone acting on their behalf.

ING may also disclose your information to AGIC and/or PHIS, and AGIC and/or PHIS may disclose information to ING, in order to assist with responding to complaints related to products and services provided by any of us.

If ING ceases to act as an Authorised Representative of AGIC, ING may also disclose the personal information that it or AGIC and/or PHIS has collected from you, to third parties including other insurance brokers and/or insurance companies, so as to offer or supply you with insurance, unless you tell ING otherwise.

The information we provide to third parties will be strictly limited to what is required to provide the products and services, where disclosure is required, or authorised by or under law (for example, we may disclose information to government agencies) or where you have requested us to or have consented to the disclosure to a third party. The third parties may include overseas organisations (see below).

Subject always to our obligations under the Privacy Act, where we disclose personal information for other people noted on the policy, for a permitted purpose, to you or another third party you will ensure that they have consented to that use or disclosure.

Exchange of information with overseas parties

Some of the parties with which we exchange your personal information, including our service providers and other third parties referenced above, may be located outside Australia in countries likely to include Japan, Philippines, Singapore, South Africa, United Kingdom, Canada, Israel, the United States of America, Ireland and the Netherlands. Where we do this, we make sure that such organisations have the appropriate data handling and security arrangements in place.



8. Access to and accuracy of personal information

You can request access to the personal information the parties hold about you at any time by using the Contact Details noted below and we will provide you with that information unless we are prevented by law from giving you that access. If we are unable to provide you with the requested information, we will provide you with a written explanation.

Where access is granted to your information, we may charge a reasonable fee for such access and if we do, we will advise you of the fee prior to proceeding with the request.

We take reasonable measures to ensure that the personal information we hold about you is accurate and up to date. Under the Privacy Act, you also have a right to request that we correct information, if you believe your personal information is not accurate and up to date, we encourage you to inform us by contacting us using the Contact Details noted below. We will update any information that is incorrect within 30 days and will notify you when we have done so. If we are unable to provide you access or update your information within 30 days, we may need to ask you for an extension. If we do so, we will provide you with the reasons for this request. If you do not consent to the extension sought by us, we may not be able to resolve your access or correction request.

9. How we store personal information

We will store your personal information in a number of ways including:

- in electronic systems and devices;
- in telephone recordings;
- in paper files;
- secure document retention services off-site; and/or
- cloud facilities operated by us (or by third parties on our behalf).

10. Information security

We will take reasonable precautions to ensure that the personal information that we have about you is protected against any unlawful use, unauthorised access, modification or disclosure and these precautions include:

- using appropriate information technology and processes;
- using computer and network security systems with appropriate firewalls, encryption technology and passwords for the protection of electronic files;
- securely destroying or "de-identifying" personal information if we no longer require it subject to our legal obligations to keep some information for certain prescribed periods;
- restricting access to your personal information to our employees and those who perform services for us who need your personal information to do what we have engaged them to do; and/or
- requesting certain personal information from you when you wish to discuss any issues relating to the products and services we provide to you.

While we undertake reasonable steps to protect your personal information, no guarantee can be given that information sent over the internet is always 100% secure. Sending and receiving information over the internet is at the user's own risk, however we will take all reasonable steps to ensure your data security once we receive it.

Where information is stored by third parties (whether based in Australia or overseas), we will take reasonable steps to ensure that your information is held under the same level of protection.

11. Website links

ING has linked its website to PHIS' and AGIC's website for the purposes of offering you certain insurance products. When using ING's website, you will be subject to the terms of ING's Privacy Policy.

We have no control over the content on other websites that are accessible from a link on their websites, and they take no responsibility for the conduct of those third party companies.

Always read the privacy and security statements when using other websites.



12. Complaints

We are committed to resolving any complaints related to privacy and personal information. If you wish to make a complaint because you believe we have not complied with our obligations under the Privacy Act, or about the way we have handled your personal information, please contact us at any time by contacting us using the Contact Details noted below.

Our representative will be in contact with you regarding your concern or complaint and will let you know who will be assisting you, their contact details and the expected resolution date of your issue within 24 hours or as soon as practicable.

If the issues raised are more complicated, we may ask you for additional documentation to help resolve the issues. In turn, we will keep you updated on the progress of your complaint.

We will attempt to respond to any complaints as soon as possible, and no later than 30 days once we've verified your identity. However, if it is a complex matter, we may need to ask you for an extension to this period and give you the reasons why we need to have the period extended. If you do not consent to the extension sought by us, we may not be able to resolve your complaint.

You may also refer your complaint to the Office of the Australian Information Commissioner (OAIC) using the Contact Details noted below. Please note the OAIC requires any complaint must first be made to us directly. The law also allows 30 days for us to deal with the complaint before a person may make a complaint to the OAIC.

13. Contact details

PHIS Privacy Officer

privacyquery@pethealthinsuranceservices.com.au

Privacy Officer
Pet Health Insurance Services Pty Ltd
PO Box 342
TOOWONG QLD 4066

AGIC Privacy Officer

privacyquery@autogeneral.com.au

Privacy Officer
AGIC
PO Box 342
TOOWONG QLD 4066

ING Privacy Officer

privacyaccessrequests@ing.com.au

ING Privacy Officer
GPO Box 4094
Sydney NSW 2001
Call: 133 646

Australian Information Commissioner

enquiries@oaic.gov.au

www.oaic.gov.au
GPO Box 5218
Sydney NSW 2001
Call: 1300 363 992

For the curious: ING is a business name of ING Bank (Australia) Limited. An ING Insurance policy does not represent a deposit with or liability of, and is not guaranteed or otherwise supported by, ING or any of its related bodies corporate.

