



**DJ Insurance Services, AR number 440038
as an Authorised Representative of
Winley Insurance Group Pty Ltd**

PRIVACY POLICY

1. Introduction

This Privacy Policy applies to the business of Winley Insurance Group Pty Ltd ACN 138 133 285 and its related companies ("we" or "us"), and sets out how we will use your personal information. We are committed to safeguarding your privacy and the confidentiality of your personal information, and we are committed to complying with the Australian Privacy Principles as set out in the *Privacy Act 1988* (Cth) (the Act).

2. Kinds of personal information we collect and hold:

Personal information is any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not, and
- whether the information or opinion is recorded in a material form or not.

Types of personal information we generally collect may include:

- Names, addresses, dates of birth and contact details;
- Details of any property being insured;
- Financial details for consumer credit insurance or in cases where insured property is financed;
- Personal qualifications if relevant such as for professional liability insurance;
- [For employment applications – past employment information, qualifications, information about residency status and proof of identity details.]

3. How personal information is collected and held

When we need to collect personal information we will, in most cases, collect the information directly from you.

At or before the time when we collect personal information, we will take reasonable steps to ensure that you are made aware of the purpose for collecting that information and how that information will be used. Where reasonable, we will collect personal information directly from you and not through another party.

If you provide us with personal information of a third party, you must first take reasonable steps to ensure that the third party is aware of:

- (1) the fact that their information will be disclosed to us and how to contact us;
- (2) the purpose for which we are collecting their personal information;
- (3) the persons or types of organisations to which we usually disclose such information;
- (4) their right to gain access to the information; and

Winley Insurance Group Pty Ltd t/a Winley Insurance Group
ACN: 138 133 285 • ABN: 39 138 133 285 • AFS Licence No: 343573

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Telephone: 08 9408 6461 • Facsimile: 1300 732 208 • Email: info@winley.com.au • Web: www.winley.com.au

(5) ensure that the third party has separately consented to their personal information being used and disclosed by us.

Occasionally, we may disclose your personal information to third parties for the purposes of facilitating services that you have requested or in connection with our other security and statutory obligations. Before we disclose your personal information to third parties, we will use reasonable endeavours to satisfy ourselves that the third party will only make use of the personal information in accordance with the Act.

Unless we are required or permitted by law to collect sensitive personal information, such as health information, we will first obtain your consent.

We collect personal information that you submit when you are using our online services, including payment information or recruitment information processed by our service providers.

We use common internet technologies, such as cookies, to collect general statistical information on visitors to our websites. Cookies are also used to assist you in your use of our online facilities. We do not collect personal information from cookies or use cookies for marketing purposes. We collect generalised statistics on web pages visited (including time, date and number of "hits") but do not record personal details of visitors to our websites.

Your personal information is held in secure environments including computer systems and databases, paper records and telephone recordings. We may utilise related companies, agents and third party suppliers for data storage services.

When you supply information via the internet, all information you submit is held securely and is not retained on our web servers. Credit card details submitted via our websites are processed through our service providers. Other information held on our systems cannot be accessed through the internet connection. Our online payment facilities are secure and the data, once collected, cannot be accessed through the internet.

4. Purposes for collecting, holding, using and disclosing personal information

We only collect personal information where it is reasonably necessary for one or more of our functions or activities, such as assessing and administering an insurance application or policy, processing a claim or assessing an individual for employment. Where the personal information is sensitive – such as health and medical information – we will also obtain your consent before collecting the information unless we are permitted by law or an exception under the Act applies. An example of an exception would be where the collection is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety.

If you request, there are limited circumstances where you may be able to deal with us anonymously or by using a pseudonym. Examples include where you are seeking only general information about one of our products or services, or are looking only for indicative pricing. In most cases it will not be reasonably possible for you to deal with us in this way.

If you do not supply the information we request we may not be able to process your application for insurance, administer your policy, process your claim or accept your expression of interest or application for employment with us.

5. How we use and disclose your personal information

We will only use or disclose your personal information in ways that you would reasonably expect, in order for us to provide and market insurance services to you. We will request your consent for any other purpose.

Whenever we contact you for marketing purposes we will give you the opportunity to be placed on our "no marketing contact" register. You may opt out of our direct marketing programmes at any time by contacting us using the details provided in this Privacy Policy.

6. Who we may disclose your personal information to and why

We, or our authorised agent, may disclose your personal information to:

- any person authorised by you;
- a mail house, records management company or technology services provider (for printing and/or delivery of mail and email, including secure storage and management of our records);
- a financier whose name appears on your policy schedule (for the purpose of confirming the currency of your policy or when you have a claim and the insured property is a total loss, to confirm if the financier has a current interest);
- in the case of travel insurance an airline, medical practitioner or other health care provider, treating doctor or emergency assistance provider (to establish your medical status or fitness to travel, or where we arrange for medical treatment or rehabilitation services) or a family member (in the case of a medical emergency);
- an organisation that provides you with banking facilities (for the purpose of arranging direct debit or other payment transactions or confirming payments made by you to us);
- a referrer, or a financial services provider or our agent who is arranging your insurance (for the purpose of confirming your personal and insurance details);
- another person named as a co-insured on your policy (for the purpose of confirming if full disclosure has been made to us);
- another insurer (to obtain confirmation of your no claim bonus or to assess insurance risks or to assist with an investigation);
- our reinsurers (for the purpose of seeking recovery from them);
- a dispute resolution organisation such as the Financial Ombudsman Service (for the purpose of resolving disputes between us and you or between us and a third party);
- a company who conducts surveys on our behalf for the purpose of improved customer services; and
- an insurance reference bureau (to record any claims you may make upon us).
- In addition to the above, in the event of a claim, we or our authorised agent may disclose your personal information:
 - to a repairer or supplier (for the purpose of repairing or replacing your insured items);
 - to an investigator or assessor (for the purpose of investigating or assessing your claim);
 - to a lawyer or recovery agent (for the purpose of defending an action by a third party against you or recovering our costs including your excess or seeking a legal opinion regarding the acceptance of a claim);
 - to a witness to a claim (for the purpose of obtaining a witness statement);
 - to another party to a claim (for the purpose of obtaining a statement from them or seeking recovery from them or to defend an action by a third party).
- Personal information (about you) may also be collected from the above people or organisations.

7. Accessing and seeking correction of your personal information

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Our aim is to always have accurate, complete, up-to-date and relevant personal information. When you receive policy schedules, renewal notices or other documents from us you should check that the information is correct. You may contact us to request access to your personal information that we hold at any time, and request us to correct any errors in that information. Generally no restrictions or charges will apply.

8. Miscellaneous

In this policy “personal information” has the same meaning as under the Act.

This policy represents our policy as of September 10, 2010 forward. We may change this policy from time to time. Although we intend to observe this policy at all times, it is not legally binding on Winley Insurance Group Pty Ltd in any way. From time to time we may regard it as necessary or desirable to act outside the policy. Winley Insurance Group Pty Ltd may do so, subject only to any other applicable contractual rights you have and any statutory rights you have under the Act or other applicable legislation. This Policy does not apply to employee records of current or former employees.

9. How you can contact us or make a complaint

If you would like more information about how we manage your personal information, wish to request access to or correction of your personal information, please contact our compliance manager as follows:

Winley Insurance Group Pty Ltd ACN 138 133 285

Mail: PO Box 7195, Cloisters Square, Perth, WA 6850

E-mail: privacy@winley.com.au

If you have a complaint, please contact us and we will make every effort to resolve your complaint or refer you to our independent dispute resolution processes.

This policy represents our policy as of 01 July 2014 forward. We may change this policy from time to time.