

Australian Privacy and Spam Policy

Quantum Underwriting Agencies Pty Ltd ABN 68 131 910 542 (Authorised Representative No 328 372)
Suite 2, Eaton House, 10 Cassowary Bend, Eaton, WA 6232
T: 08 9724 1555 E: reception@qua.net.au.

Our Commitment

We recognise that your privacy is very important to you. This document is our privacy policy and it tells you how we collect and manage your personal information. Privacy Amendment (Enhancing Privacy Protection) Act 2012 sets out a number of Australian Privacy Principles (APPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at <http://www.oaic.gov.au>.

We are committed to ensuring your privacy in accordance with the Australian Privacy Act 1988 (Cth) ('the Act') and the New Zealand Privacy Act 2000 along with any applicable principles. This privacy policy sets out how we collect, store, use and disclose your Personal Information (including Sensitive Information).

By visiting our website, using an insurance portal, authorising an insurance intermediary to provide us with your Personal Information or otherwise providing us with your Personal Information, you consent to your Personal Information being, collected, stored, used and disclosed by us as set out in this privacy policy.

What is your personal information?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

What personal information do we collect and hold?

The Personal Information we collect, hold and use generally includes your name and contact information (including telephone and facsimile numbers, and email addresses), information relating to the insured risk, other reference information and information about third parties that you may conduct, or are interested in conducting, business with.

As we act as underwriting agencies, on behalf of insurers, providing and administering insurance – related products and services, we may also collect and hold other Personal Information required to provide and administer such products and services and to assist you, including details of your previous insurances and Sensitive Information.

You may be able to deal with us without identifying yourself (i.e. anonymously or by using a pseudonym) in certain circumstances, such as when making a general inquiry relating to the products and services we offer. If you wish to do so, please contact us to find out if this is practicable in your circumstances.

However, if you do not provide us with the Personal Information and other information that we need, we or any of our third party providers may not be able to provide you with the appropriate insurance products and services. You may also risk breaching your duty of disclosure or having your policy cancelled pursuant to the *Insurance Contracts Act 1984*(Cth) or otherwise.

As a financial service provider, Quantum Insurance Holdings Pty Ltd is subject to certain legislative and regulatory requirements under s961B of the Corporations Act and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. These require us to obtain personal information about you.

We may collect the following types of personal information:

- your contact details, including your name, mailing or street address, email address, telephone number and facsimile number;
- your employment details, including your profession, occupation or job title, your employer's details and salary;
- your financial details, including your tax file number, lists of personal assets and banking details;
- other personal information that may be specific to the insurance policy you are taking out with us, such as your age or birth date, names and contact details of any dependents or beneficiaries, claims history, criminal history, details of property to be insured and health and medical information;
- your objectives, financial situation or needs
- your employment-related information if you apply for a position with us;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries; and
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or your agents or representatives (such as brokers), or otherwise.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

In certain instances, we may be required to collect your name, address, date of birth and other verification information under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

How We Collect Personal Information

We may collect Personal Information in a number of ways depending on the nature of the insurance products and services being provided and administered, including:

- Directly from you via our website;
- Through any insurance – related portal;
- By telephone;

- In writing;
- By email; and/or
- From third parties (such as your insurance broker, premium funders, claims managers, other service providers or publicly from available sources). Each third party is also obliged to comply with the applicable privacy principles.

When collecting Personal Information, we will do everything we reasonably can to let you know:

- How to contact us;
- Why we are collecting the Personal Information;
- How the Personal Information is collected;
- The organisations or types of organisations to which we disclose the Personal Information (if any);
- If we are required by law to collect the Personal Information; • whether disclosure overseas is likely; and
- The consequences should you choose not to provide the Personal Information.

We also automatically collect certain information when you visit our website, some of which may be capable of personally identifying you. Please see the 'Cookies' section below for more details.

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- when you complete a proposal or order for an insurance policy;
- when you request changes to your insurance policy;
- when you make a claim or when we investigate a claim under your insurance policy;
- through your access and use of our website;
- during conversations between you or your representatives and us or our representatives; or
- when you apply for a position with us.

We may also collect personal information from third parties including:

- people who are involved in insurance decisions and claims such as investigators, actuaries, professional advisors, jewellery valuers, medical practitioners, hospitals and other health care providers and third-party claims managers;
- our related bodies corporate;
- publicly available sources;
- brokers, reinsurers, and underwriting organisations;
- other external companies such as recruitment agents, service providers, credit reporting agencies, law enforcement agencies and other government entities or any other third parties other than those listed above who assist us with complaints made by you or with incidents and claims involving you.

What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to process or consider your claim;
- we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions;
- we may be unable to communicate with you or on your behalf regarding a claim;
- if you are applying for a position with us, we may be unable to consider your application for a position; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

OUR PURPOSES FOR COLLECTING, HOLDING AND USING YOUR PERSONAL INFORMATION

- We collect and hold your Personal Information for the primary purpose of providing and administering our insurance products and services to you. When we collect Personal Information from you, the collection statement may provide a more specific or broader purpose. Such purposes for collection may include:
 - Helping us assess risks, to assess your request for insurance, to write and administer your insurance policy and any claim you may have, and to clarify or assess information that you have provided;
 - To help us improve our products and services;
 - Providing broker's customers, potential customers and others with our products and services;
 - Helping to develop and identify products and services that may interest brokers, their customers, potential customers or others;
 - Conducting market or customer research;
 - Developing, establishing and administering alliances and other arrangements with organisations not related to us in relation to the promotion, administration and use of our products and services;
 - Telling you about promotions, and our other product and service offerings which we believe may be relevant to you; and any other purpose notified to you at the time your personal information is collected.

For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you and to send communications requested by you;
- to process, investigate and respond to any claim;

- to answer enquiries and provide information or advice about existing and new products or services;
- to communicate with you and to others on your behalf in relation to your rights and any claims;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and our research purposes;
- to provide your updated personal information to our related bodies corporate, contractors or service providers;
- if you have applied for a position with us, to evaluate your application;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

Who do we disclose your personal information to and why?

DISCLOSURE OF YOUR PERSONAL INFORMATION

We will only disclose your Personal Information where it is required or reasonable to providing or administering a product or service that you have requested, or for any of the purposes outlined in this privacy policy. Where appropriate, we will disclose your personal information to:

- Our related body corporates, your broker or third parties as is required in order to provide our products and services, including our external service providers, such as payment system operators, lawyers, accountants, other advisers, financial institutions and information technology providers;
- To agents, Lloyd's underwriters; insurers, reinsurers, other insurance intermediaries, insurance reference bureaus and industry bodies and groups;
- Claims management and related service providers;
- The Financial Ombudsman Service or other alternative dispute resolution schemes;
- Administrative service providers;
- Any government organisation or agency; and
- Any other entities notified to you at the time of collection.

You authorise us to contact such third parties for the purposes of providing you with the products and services that you have requested.

Other than when required or permitted by law, as specified in this privacy policy or where you have provided your consent, we will not disclose your Personal Information for any other purpose.

Nothing in this privacy policy prevents us from using and disclosing to others de-personalised aggregated data.

DISCLOSURE OF PERSONAL INFORMATION

overseas We may disclose your Personal Information overseas (such as certain countries located in Asia and Europe, and the United States of America) where it is required or reasonable in relation to providing or administering a product or service that you have requested, or for any of the purposes outlined in this privacy policy.

If we wish to disclose your Personal Information overseas, we will inform you of this and we will take reasonable steps to ensure that the overseas recipient does not breach the applicable privacy principles. We may also gain your consent to disclose your Sensitive Information overseas, if required.

We may disclose your personal information to:

- claims investigators, actuaries, professional advisors and third-party claims managers;
- our related bodies corporate;
- brokers, reinsurers, cedants and cover holders or other underwriting organisations;
- contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, management, finance, operations and compliance staff, legal advisors, business advisors and consultants;
- to a witness or another party to a claim made by you, to a repairer, supplier, an organisation that provides you with banking facilities, property valuers and any other expert that we may need to engage for the purpose of claims assessment;
- injury management providers including medical practitioners, rehabilitation advisers and health care providers;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any organisation for any authorised purpose with your express consent.
- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer or all or part of the assets of our business. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them;
- a new owner of our business that will require the transfer of your personal information;
- government and regulatory authorities, as required or authorised by law;

Our employees and the outsourcing companies/contractors are obliged to respect the confidentiality of any personal information held by Quantum Insurance Holdings Pty Ltd.

The Corporations Act has provided the Australian Securities and Investments Commission with the authority to inspect certain personal information that is kept on our files about you.

We collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

Do we disclose your personal information to anyone outside Australia?

We may disclose personal information to third party suppliers and service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following:

- certain underwriters at Lloyd's in United Kingdom and Singapore with whom we have binding authorities;
- other third parties located overseas where it is necessary for the purposes of processing.

Direct marketing materials

From time to time, we may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list. We maintain details of the source of your personal information used for direct marketing and you have the right to request these details. We will endeavour to meet any requests within 2 weeks. We maintain a Register for those individuals not wanting direct marketing material

We do not provide your personal information to other organisations for the purposes of direct marketing.

How We Store and Secure Your Personal Information

We keep your personal information in your client files or electronically. These files are accessible to authorised personnel only and are appropriately secured and subject to confidentiality requirements.

Personal information is treated as confidential information and sensitive information is treated as highly confidential.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

Ensure Your Personal Information Is Correct

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information; and
- update us with any changes to your personal information as soon as possible.

If you provide inaccurate or incomplete information we may not be able to provide you with the products or services, you are seeking.

Unsolicited personal information

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information, we'll determine whether or not it would have been permissible to collect that personal information if it had been solicited. If we determine that collection would not have been permissible, to the extent permitted by law, we'll destroy or de-identify that personal information as soon as practicable.

Access to Your Personal Information

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information. Access to the requested personal information may include:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Some exceptions exist where we will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

Using Government Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

Dealing with us anonymously or using a pseudonym

You have the option to deal with us by not identifying yourself or by using a pseudonym where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

Your sensitive information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal

record. Should we ever undertake direct marketing, we will only use or disclose your sensitive information with your consent.

This is subject to some exceptions including when:

- collection is required by law; and
- the information is necessary for the establishment, exercise or defence of a legal claim.

Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Links

Our website may provide links to third party websites. The use of your information by these third party sites is not within our control and we cannot accept responsibility for the conduct of these organisations. Other websites are not subject to our privacy standards. You will need to contact or review those websites directly to ascertain their privacy policies.

You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database. We take care to ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data encryption.

If you do not wish to receive any further information from us, or you wish to update your registration details, please email your request to us. We will endeavour to meet your request within 5 working days.

Cookies

We use cookies on our website. Cookies are small files that are stored on your computer's browser directory or program data subfolders. Cookies allow for certain functionality such as helping you resume where you left off in a site, remembering your registered login, preferences or other customisable functions.

Cookies also help us to track your movements through our website through the use of Google Analytics software. These cookies do not collect or store any personally identifiable information. They may be used to help improve your experience on our website or otherwise help you access information about us. You have the option to restrict the use of cookies through your browser's software at any time.

Our website (www.qua.net.au) uses Google Analytics, a web analytics service provided by Google, Inc. We use it to see how many people visit our website and how they use the website once they land on it. Google Analytics is software that uses cookies to help us see how visitors use our site. The information generated about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

Google will not associate your IP address with any other data held by Google.

Recruitment

We ask for personal information from job applicants to assist with our recruitment process. The personal information you supply will be kept in a recruitment folder. Employees involved with short-listing and appointment will have access to this data. This could be managers, personnel and departmental support employees. We will not disclose this information to anyone outside of our organisation without your consent. If you are unsuccessful, we may retain your application for 12 months after the appointment has been made and, after that period, we will ordinarily dispose of your application form and any other papers submitted.

Information on your job application form may be held in hard copy or computer systems. We will observe strict confidentiality and disclosures will only be made for payroll, personnel administration and statistical purposes.

We are committed to the principle of equal opportunities. Our policy is to attract, recruit and develop the most talented and capable individuals, regardless of age, gender, sexual orientation, marital status, religion, colour, race, ethnic origin, nationality or disability. We may use this information collected from your application for the purposes of monitoring the quality of opportunity in our employment policy.

Complaints Resolutions

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. We will refer your complaint to our Privacy Officer who will investigate the issue and determine the steps we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the determination of our Privacy Officer. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner at www.oaic.gov.au.

Privacy Officer

Alexander Thornton
Suite 2, Eaton House, 10 Cassowary Bend, Eaton, WA 6232
T: 08 9724 1555 E: alex@qua.net.au

Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. Please review it regularly.

This privacy policy was last updated in October 2020

Spam Policy

Spam is a generic term used to describe electronic 'junk mail'- unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'.

The Australian Communications and Media Authority (ACMA) is responsible for enforcing the provisions of the Spam Act 2003. Additional information about the Spam Act and the ACA's role is available from: www.acma.gov.au.

'Electronic messaging' covers emails, instant messaging, SMS MMS and other mobile phone messaging, but not cover normal voice-to-voice communication by telephone.

We comply with the provisions of the Spam Act when sending commercial electronic messages.

Equally importantly, we make sure that our practices are in accordance with the Australian Privacy Principles in all activities where they deal with personal information.

Internal Procedure for dealing with complaints

The three key steps we follow are:

- Consent – Only commercial electronic messages are sent with the addressee's consent – either express or inferred consent.
- Identify – Electronic messages will include clear and accurate information about the person and the Quantum Insurance Holdings Pty Ltd that is responsible for sending the commercial electronic message.
- Unsubscribe – We ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

Comply with the law regarding viral messages

We ensure that Commercial Communications that include a Forwarding Facility contain a clear recommendation that the Recipient should only forward the Commercial Communication to persons with whom they have a relationship, where that relationship means that person could be said to have consented to receiving Commercial Communications.

Comply with the age sensitive content of commercial communication

Where the content of a Commercial Communications seeks to promote or inspire interaction with a product, service or event that is age sensitive, we take reasonable steps to ensure that such content is sent to Recipients who are legally entitled to use or participate in the product service or event.

Complaints Resolutions

The Spam Act specifies that the message sender has five working days to act on unsubscribe requests from the date that an unsubscribe request was sent (in the case of electronic unsubscribe messages) or delivered (in the case of unsubscribe messages sent by post or other means).

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner or the Australian Communications Authority.

Privacy Officer

Alexander Thornton

Suite 2, Eaton House, 10 Cassowary Bend, Eaton, WA 6232

T: 08 9724 1555 E: alex@qua.net.au

DISCLOSURE OF YOUR PERSONAL INFORMATION

We will only disclose your Personal Information where it is required or reasonable to providing or administering a product or service that you have requested, or for any of the purposes outlined in this privacy policy. Where appropriate, we will disclose your personal information to:

- Our related body corporates, your broker or third parties as is required in order to provide our products and services, including our external service providers, such as payment system operators, lawyers, accountants, other advisers, financial institutions and information technology providers;
- To agents, Lloyd's underwriters; insurers, reinsurers, other insurance intermediaries, insurance reference bureaus and industry bodies and groups;
- Claims management and related service providers;
- The Financial Ombudsman Service or other alternative dispute resolution schemes;
- Administrative service providers;
- Any government organisation or agency; and
- Any other entities notified to you at the time of collection.

You authorise us to contact such third parties for the purposes of providing you with the products and services that you have requested.

Other than when required or permitted by law, as specified in this privacy policy or where you have provided your consent, we will not disclose your Personal Information for any other purpose.

Nothing in this privacy policy prevents us from using and disclosing to others de-personalised aggregated data.

DISCLOSURE OF PERSONAL INFORMATION

overseas We may disclose your Personal Information overseas (such as certain countries located in Asia and Europe, and the United States of America) where it is required or reasonable in relation to providing or administering a product or service that you have requested, or for any of the purposes outlined in this privacy policy.

If we wish to disclose your Personal Information overseas, we will inform you of this and we will take reasonable steps to ensure that the overseas recipient does not breach the applicable privacy principles. We may also gain your consent to disclose your Sensitive Information overseas, if required.

DIRECT MARKETING AND HOW TO OPT OUT

When we collect your Personal Information, we may use this information to provide you with information about our other products and services. If you no longer wish to receive such information, or you do not want us to disclose your Personal Information to any other organisation (including any related body corporates), you can opt out by contacting us using our contact details below.

We will not sell or trade your Personal Information for marketing or any other purpose.

YOUR OBLIGATIONS WHEN YOU PROVIDE PERSONAL INFORMATION OF OTHERS

You must not provide us with Personal Information (including any Sensitive Information) of any other individual (including any of your employees or clients if you are a broker) unless you have the express consent of that individual to do so. If you do provide us with such information about another individual, before doing so you:

- Must tell that individual, via a collection statement, that you will be providing their information to us and that we will handle their information in accordance with this privacy policy;
- Must provide that individual with a copy of (or refer them to) this privacy policy; and
- Warrant that you have that individual's consent to provide their information to us. If you have not done this, you must tell us before you provide any third party information.

Your obligations when we provide you with Personal Information

If we give you, or provide you access to, the Personal Information of any individual, as authorised under this privacy policy, you must only use it:

- For the purposes we have agreed to; and
- In compliance with applicable privacy laws, including any applicable privacy principles and this privacy policy.

You must also ensure that your agents, employees and contractors meet the above requirements.

ACCURACY, ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION

We take reasonable steps to ensure that your Personal Information is accurate, complete and up-to-date whenever we collect, use or disclose it. However, we also rely on you to advise us of any changes to your Personal Information. All Personal Information identified as being incorrect is updated in our database.

Please contact us using our contact details below as soon as possible if there are any changes to your Personal Information or if you believe the Personal Information we hold about you is not accurate or complete. We may refuse to correct Personal Information if the correction would not improve the accuracy, completeness, relevance or would make the information misleading. If we

refuse to correct your Personal Information, we will record that a request was made and advise you why the request was refused.

You can make a request to access your Personal Information by contacting us using the contact details below. If you make an access request, we will provide you with access to the Personal Information we hold about you, unless otherwise required or permitted by law, within a reasonable time after the request is made. We will notify you of the basis for any denial of access to your Personal Information. No fee will be charged for an access request. However, we may charge the reasonable cost of complying with the access request, such costs notified to you before they are incurred.

SECURITY OF YOUR PERSONAL INFORMATION

We take reasonable steps to protect any Personal Information that we hold from misuse, interference and loss, and from unauthorised access, alteration and disclosure.

For example, we maintain physical security over our paper and electronic data stores and premises, such as locks and security systems. We also maintain computer and network security. For example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to computer systems.

However, data protection measures are never completely secure and, despite the measure we have put in place, we cannot guarantee the security of your Personal Information. You must take care to ensure you protect your Personal Information (for example, by protecting any usernames and passwords). You should notify us as soon as possible if you become aware of any security breaches.

HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION

We will retain your Personal Information for no longer than is required for any purpose under this privacy policy unless we are required by law to retain the information for a longer period. We will make reasonable efforts to destroy or de-identify your Personal Information after this time in accordance with any record management policy and procedure.

LINKS TO THIRD PARTY SITES

Our website may contain links to other third party websites. We do not endorse or otherwise accept responsibility for the content or privacy practices of those websites or any products or services offered on them. We recommend that you check the privacy policies of these third party websites to find out how these third parties may collect and deal with your Personal Information.

COOKIES

Like many website operators, we may use standard technology called cookies on our website. Cookies are small data files that are downloaded onto your computer when you visit a particular website. Cookies help provide additional functionality to the site or to help us analyse site usage more accurately. For instance, our server may set a cookie that keeps you from having to enter a password more than once during a visit to one of our sites. In all cases in which cookies are used, the cookie will not collect Personal Information except with your consent. You can disable cookies by turning them off in your browser; however our website may not function properly if you do so.

HOW TO MAKE A COMPLAINT

If you wish to make a complaint about how we have treated your Personal Information, you can lodge a complaint by using the contact details below. You will need to provide us with sufficient details regarding your complaint together with any supporting evidence and information.

We will refer your complaint to our Privacy Officer who will investigate the issue and determine the steps that we will undertake to resolve your complaint. We will contact you if we require any additional information and will notify you in writing of the outcome of the investigation. We will try to resolve any complaint within 14 working days. If this is not possible, you will be contacted within that time to let you know how long it is likely to take us to resolve your complaint.

If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au or the New Zealand Privacy Commissioner, in New Zealand via www.privacy.org.nz

PRIVACY POLICY CHANGES

We may make changes to this policy as a result of operational or legislative changes. When changes are made to this policy the updated policy will be uploaded to our website and the effective date updated accordingly.

HOW TO CONTACT US

If you wish to gain access to your Personal Information, want us to correct or update it, have a complaint about how we have treated your Personal Information or any other query relating to our privacy policy, please contact our Privacy Officer during business hours in Sydney on:

The Privacy Officer

Telephone: +61 2 9307-6656

Fax: +61 2 9307-6699

Email: privacyofficer@steadfastagencies.com.au

Alternatively, you can contact us via:

 **Steadfast Underwriting Agencies**

Level 5

97-99 Bathurst St

Sydney NSW 2000

P O Box A2016

Sydney South NSW 1235

Telephone: +61 2 9495-6500

Facsimile: +61 2 9307-6699

Email: privacyofficer@steadfastagencies.com.au

Web: www.steadfastagencies.com.au

In Australia, for further information on privacy, visit the Australian Government Office of the Australian Information Commissioner Website at: www.oaic.gov.au

or

In New Zealand, for further information on privacy, visit New Zealand Privacy Commissioner at: www.privacy.org.nz

Effective Date: 1 October 2015