

## PRIVACY POLICY

PetSure (Australia) Pty Ltd, its authorised agents and the insurance company issuing your policy collect your personal information to provide the products and services you request. Without this information, we cannot provide these products or services.

However, protecting your privacy and the confidentiality of your personal information is important to us. This policy sets out how we aim to do so.

### **DEFINITIONS**

In this Privacy Policy:

'Our', 'Us' and 'We' refers to PetSure (Australia) Pty, ABN 95 075 949 923, Authorised Representative Number 268991 of 46 Carrington Road, Castle Hill, NSW 2154, Australia.

'Personal Information' means any information that can identify an individual.

'Sensitive Information' is a sub set of Personal Information and concerns particular topics including information about health, racial or ethnic origin, political, philosophical or religious views or affiliations, sexual preferences or practices, memberships of professional or trade associations or trade unions or criminal records.

'Related Companies' has the same meaning as section 50 of the Corporations Act 2001 (Cth).

'You' refers to our customers and prospective customers. It also refers generally to users of our web site.

### **OUR COMMITMENT**

We recognise that your privacy is very important to you. We are committed to protecting the privacy of your Personal Information in accordance with the Federal Government's Privacy Act 1988 (as amended by the Privacy Amendment (Private Sector) Act, 2001).

The Privacy Act details National Privacy Principles that set minimum standards for how private sector organisations should collect, use, disclose, keep secure and provide access to Personal Information.

We are committed to complying with the National Privacy Principles.

## **CURRENCY AND STATUS OF OUR PRIVACY POLICY**

Our current privacy policy is detailed below. It is current as of and from 1 November 2003. We suggest that you read it thoroughly.

This policy may change from time to time and all changes will be posted on our web site so please check it periodically. Alternatively, you can request copies of our most recent policy by using any of our regular contact details, or by emailing [privacy@petsure.com.au](mailto:privacy@petsure.com.au).

Whenever using our web site you should read this policy in conjunction with our Terms of Use.

## **PERSONAL INFORMATION WE COLLECT**

The Personal Information we collect depends on the products and services you use or apply for. Typically the details we collect and hold include your name, contact details (address, phone and fax number, e-mail address) date of birth, gender and payment details. We may also collect information that is specific to a particular product. This includes details of your pet and its veterinary history.

We do not collect 'Sensitive Information'.

Where possible, you have the option of interacting with us anonymously. For example, you may visit and browse our website and use some of our online facilities without having to reveal any Personal Information.

## **HOW WE COLLECT YOUR PERSONAL INFORMATION**

We collect your Personal Information from you in various ways and at several different points. We may collect your Personal Information on our web site, by telephone, facsimile, when you complete an application form for one of our products or services and forward it to us, enter a competition or voluntarily participate in a survey.

Wherever possible, we collect your Personal Information directly from you. There may, however, be occasions where we collect your Personal Information from someone else. For example, where you make an application in joint names, where it is provided to us by a third party (such as our authorised agents) with your consent or where we need to obtain information from professional experts (such as a veterinarian) for the purposes of assessing a claim or providing you with insurance cover.

If you provide Personal Information to us about another person, we rely on you to have made or make them aware that you will, or may, provide their information to us and the types of third parties we may provide it to, the relevant purposes we and any of the third parties will use it for and how they can access it. If you have not done, or will not do, so, you must tell us before you provide the relevant Personal Information.

We are underwriting agents for, and administrators of, a range of pet health insurance products. In order for us to provide these services, we may also collect your Personal Information from the organisation that provided you with or sold you the product or services used.

A number of interactive tools or facilities may be available on our web sites. If you use any of these tools or facilities, we generally do not collect your Personal Information unless a particular tool permits you to suspend or save information and recover those details at a later time. In these circumstances, your Personal Information may be retained on our systems but is not processed or used by us except that it may be used for the purposes of online quoting and subsequent follow up.

We do not use cookies to collect information about how our website is used.

From time to time we may request Personal Information from you through competitions or surveys. Participation in these competitions or surveys is completely voluntary and you, therefore, have the choice of whether or not you disclose the Personal Information requested.

## **WHY WE COLLECT AND HOW WE USE PERSONAL INFORMATION**

We generally collect Personal Information to provide the various products and services we administer. More specifically, we collect and use Personal Information primarily in order to establish risk and determine premiums, process applications, service accounts, process payments, assess claims, confirm identification and protect Personal Information from unauthorised access or to satisfy legal requirements.

If we do not collect your Personal Information we will not be able to provide you with the product or service that you are seeking.

We use Personal Information we may collect through competitions to determine prize winners, award prizes and notify winners. We use Personal Information we may collect through surveys to assess your satisfaction with our products and services and to determine how we may better service your needs. We, and our related companies, may also use Personal Information you provide if you chose to enter a competition or answer a survey for research and statistical analysis.

## **DIRECT MARKETING**

On occasion, we, and our Related Companies, may use your Personal Information to provide you with information about the products and services we administer.

If you do not wish to receive any of this information please let us know by contacting our Membership personnel or by sending an e-mail to [privacy@petsure.com.au](mailto:privacy@petsure.com.au).

You can, however, change your mind about receiving information about our products and services at any time by contacting us as above.

## **SHARING AND DISCLOSING YOUR PERSONAL INFORMATION**

**We never sell, rent or trade your Personal Information.**

We may share your Personal Information with Related Companies.

We will not share your Personal Information with any unrelated party except under the following circumstances:

- where a product or service you apply for is provided or supplied by or through a third party;
- where a third party, such as a mailing house, carries out activities on our behalf;
- if disclosure is otherwise required in order to provide you with a particular product or service;
- in order to ensure our ability to continue providing products and services;
- if disclosure is required for the purposes of conducting business analysis in order to improve our products and services;
- if disclosure is required by law;
- where a third party has an interest in the product or service we supply, for example a referral agent, distributor or insurance intermediary;
- where it is necessary for a third party to assist us in providing our services, for example, underwriters, insurance intermediaries, lawyers, accountants, veterinarians and others involved in the claims handling process;
- where you have provided your consent - which may be given expressly or may reasonably be implied by your conduct.

Related and unrelated third parties to whom your Personal Information is disclosed are required to keep the information confidential and only use it for the same purposes we are permitted to use it.

## **QUALITY OF YOUR PERSONAL INFORMATION**

We aim to ensure that your Personal Information is accurate, complete and up to date.

During the course of your relationship with us we will ask you to inform us of any changes to your Personal Information. You should, however, contact us at any time to update your Personal Information or advise us that the information we have is not accurate or complete.

## **SECURITY OF YOUR PERSONAL INFORMATION**

We are committed to keeping your Personal Information secure and will use all reasonable precautions to protect it from loss, misuse or unauthorised alteration, including:

- Physically securing premises;
- Maintaining computer and network security such as user identifiers and passwords to control access to computer systems;
- Restricting access to your Personal Information to employees or those who perform services on our behalf who are authorised to handle your Personal Information and on a 'need to know' basis;
- Entering into confidentiality agreements with relevant employees and third parties;
- Appropriate training of staff;
- Retaining your Personal Information for no longer than it is reasonably required to service a policy or continue to provide any products and services requested by you, unless we are required by law to retain it for longer;
- Taking reasonable steps to destroy or de-identify Personal Information that we no longer require.

## **ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION**

You may generally access the information we hold about you and request corrections. This right is, however, subject to the exceptions detailed in the National Privacy Principles. For example, we may refuse access where:

- the information may have an unreasonable impact on the privacy of others;
- the request is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings;
- the information would reveal our intentions in relation to negotiations in such a way as to prejudice those negotiations.

If we deny you access we will let you know why.

Where providing access would reveal evaluative information in connection with a commercially sensitive decision-making process, we will provide an explanation for the decision rather than direct access to the information.

In most cases, you may access a summary of your Personal Information at no cost to you by telephoning our Membership personnel or emailing [privacy@petsure.com.au](mailto:privacy@petsure.com.au).

For access to complex information or more detailed requests for access to your Personal Information, for example, access to information that is archived, we may require you to place your request in writing and charge you a fee for our reasonable costs of retrieving and supplying the information to you.

In all cases you will be asked to verify who you are before your Personal Information is provided.

All requests for Personal Information will be handled in a reasonable period of time.

## **QUESTIONS AND SUGGESTIONS**

If you have any questions, suggestions or complaints about our privacy practices or this privacy policy, please e-mail [privacy@petsure.com.au](mailto:privacy@petsure.com.au). We will respond to your question, suggestion or complaint as soon as possible.

You can obtain information on privacy issues in Australia by visiting the Australian Federal Privacy Commissioner's web site located at [www.privacy.gov.au](http://www.privacy.gov.au) or by telephoning 1300 363 992.