

Privacy Policy

Who are we?

We are Calliden Group Limited (ACN 061 215 601). This Privacy Policy applies to the Calliden group of companies, which includes the following:

CALLIDEN GROUP OF COMPANIES which are covered by these Terms & Conditions of Trade
(Calliden Agency Services Limited ABN 15 096 726 895 (AFSL 234437) (also t/as Mansions of Australia, ARGIS Insurance and Interruption Underwriting Agencies), Calliden Insurance Limited ABN 47 004 125 268 (AFSL 234438) and Dawes Underwriting Australia Pty Limited ABN 18 050 289 506 (AR 342982) ('Calliden')



Our commitment to privacy

We are committed to ensuring your privacy in accordance with the Privacy Act 1988 ('the Act') and the Australian Privacy Principles. Any personal information collected by us will be with your knowledge and/or consent. This document outlines how we will collect, use, store, and disclose your personal information in accordance with the Act.

What is Personal information?

Personal information is any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true, and whether or not it is recorded in a material form.

Sensitive information is a subset of personal information which may need to be afforded a higher level of protection. Sensitive information may include personal information and is defined more specifically in the Act.

What is the purpose of our collection of personal information?

We collect your personal information for the primary purpose of providing insurance products and/or services to you. When we collect your personal information from you, the collection statement may provide a more specific purpose for which we are collecting your personal information. We may also collect your personal information for the purpose of providing you with information about Calliden services or promotions from time to time. We will collect personal information that you would expect to be collected for the purposes of providing and administering an insurance policy.

How do we collect your personal information?

The method by which personal information may be collected will depend on the nature of the insurance products and services being provided. We may collect personal information in person, in writing, by telephone, via email or from the internet. Whenever we collect 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; and
- the consequences should you choose not to provide the personal information.

We authorise agents, brokers, claims managers, intermediaries and other service providers to collect personal information on our behalf. In each case, the service provider is authorised to: collect the information; record, use and store the information for the services we have authorised them to perform; and to disclose the personal information to us. When doing so, they are also obliged to comply with the Australian Privacy Principles. This includes informing you that your personal information may be disclosed to us.

In some circumstances we may seek personal information that other external parties hold on you. This will generally be to clarify or assess information that you have provided on your proposal form or claim form.

If you do not provide us with the personal information and other information required, we may not be able to provide you with the insurance product or service you request (including payment) and you may risk breaching your duty of disclosure or having your policy cancelled.

When you visit a Calliden group website a record of your IP address is kept. Your IP address only identifies the computer used to access a Calliden group website and does not identify you as an individual. We will not take steps to attempt to identify you from your IP address. We may use your IP address to monitor the level of website traffic; help diagnose problems with our server; and to help with the general administration of the website.

How do we use your personal information?

We use your personal information to help us assess risks, to assess your request for insurance, to write and administer your insurance policy and any claim that you may have, to provide other insurance services requested by you, to notify you about other Calliden services or promotions from time to time, to help us improve our services and products, and to clarify or assess information that you have provided.

Do we disclose your personal information to other parties?

We will only disclose your personal information to external parties where it is required or reasonably related to providing a product or service that you have requested us to provide, or for any of the purposes outlined in this Privacy Policy. Personal information for the purposes outlined may be shared on a confidential basis with:

- agents, advisors, and brokers;
- underwriters;
- claims management and other service providers;
- claims adjusters, loss assessors, and other claims investigators authorised by us;
- administrative service providers;
- financial institutions (where processing a payment);
- lawyers;
- our reinsurers and reinsurance brokers; and
- the Financial Ombudsman Service or other alternative dispute resolution schemes.

We may disclose your information to any government organisation or other organisation as required under law. We may also disclose information to any other party where consent is obtained from you prior to the disclosure.

Will we disclose your personal information to overseas recipients?

We may disclose your personal information to our overseas insurers and reinsurers. If we intend to disclose your personal information overseas we will inform you of this via a collection statement and we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles. We may also gain your consent to disclose your sensitive personal information overseas, if required.

Will we use your personal information for direct marketing purposes?

From time to time, we may advise or offer you information about other Calliden group insurance products and services that may be relevant and of interest to you. If you would prefer not to receive these communications you may inform us or your broker/agent. You can inform us by contacting our Privacy Officer using the contact details set out at the end of this policy. All electronic communications contain an unsubscribe function and all direct marketing communications will provide you with a means of informing us that you do not wish to receive direct marketing in the future. We will not sell or trade your personal information for marketing or any other purpose.

How do we store your personal information?

We store all personal information by using a combination of secure physical and electronic storage methods. We take reasonable steps to ensure that the security of all personal information is adequate to protect it from being used or disclosed for any other purpose other than the provision of our insurance products and services or to inform you about Calliden services or promotions from time to time. We take reasonable steps to ensure that your personal information is not interfered with, lost, accessed by unauthorised persons or modified without authorisation. We also train our staff about the requirements of the Act.

How long do we retain your personal information?

We will retain your personal information for no longer than is needed for any purpose under this Privacy Policy unless we are required by law to retain the information for a longer period. We will destroy or de-identify your personal information after this time in accordance with our internal Record Management Policy. Retained information is only accessible by authorised employees and those who have received a disclosure of your personal information in accordance with this Privacy Policy.

Can you deal with us anonymously or pseudonymously?

If you have a general enquiry regarding our products or services you may make this enquiry anonymously or pseudonymously. However, due to the nature of our products and services and your duty of disclosure obligations when obtaining our products and services, you may not deal with us anonymously or pseudonymously when making any enquiry specific to your circumstances or when obtaining products or services from us. In some circumstances, you may deal with us pseudonymously when entering competitions and promotions managed by us. Please refer to the terms and conditions of entry or the collection statement for competitions and promotions managed by us to determine whether you can enter pseudonymously.

What happens if you do not provide information requested?

If you do not provide the personal information and other information requested we may not be able to provide the products and services you have requested. This may mean that we cannot accept an application for insurance, write and administer an insurance policy, process a claim, process a payment or provide other insurance services requested by you. If you do not provide personal information and other information requested by us you may also be in breach of your Duty of Disclosure and we may cancel your insurance policy.

How can you access personal information we have about you?

You may request access to your personal information by contacting us. We will take reasonable steps to ensure that the personal information we hold about you is accurate, complete, relevant, up-to-date and is not misleading when it is collected, used or disclosed.

If you wish to make a request to access your personal information, please contact our Privacy Officer using the details set out at the end of this Privacy Policy. When making a request to access your personal information, we will carry out a verification process in order to determine that your information is not accessed by other individuals. For simple requests we will provide the information free of charge. In some circumstances we may pass on any direct costs associated with obtaining any information that you request. Any charges will be reasonable and will be notified to you before they are incurred.

How can you correct any errors in the information we hold?

If you would like to request that we correct personal information that we hold about you, please contact our Privacy Officer using the details set out at the end of this Privacy Policy. When making a request to correct your personal information, we will carry out a verification process in order to determine that your information is not accessed or corrected by other individuals.

We may refuse to correct personal information if the correction would not improve the accuracy, completeness, relevance, would not make the personal information more up-to-date or would make the information misleading. When making this determination, the purpose for which the personal information is held and how the information is presented is a relevant factor. Where we refuse to correct the personal information, we will record that a request to correct the information was made and advise you why the request was refused.

How can you complain about how your personal information has been treated?

If you are dissatisfied with how we have treated your personal information you can lodge a complaint with the Privacy Officer, using the contact details set out at the end of this Policy. Your complaint will be managed through our internal privacy complaints procedure. We will attempt to resolve your complaint within 15 days, unless it is of a complicated nature, in which case we will attempt to resolve your complaint within a reasonable period of time, and we will inform you of the timeframe in which your complaint will be reviewed.

If you are not satisfied with the way we have handled your complaint you may contact the Office of the Australian Information Commissioner.

Will we update our Privacy Policy regularly?

We review this Privacy Policy every 12 months or as required by the operational impact of legislative changes. We may make changes to this Policy as a result of such review. When changes are made to this Privacy Policy, this document will be updated and the effective date updated accordingly.

How can you contact us?

If you have any questions about this Privacy Policy, wish to access or correct your personal information, or would like to make a complaint about privacy, please contact our Privacy Officer by:

- Phone – 1300 00 2255
- Fax – 1300 662 215
- Email – privacy@calliden.com.au
- Mail – PO Box 348, Milsons Point NSW 1565

Effective Date: 1 November 2014