

PetSure Privacy Policy

PetSure (Australia) Pty Ltd, its authorised agents, its Related Companies, its Brand Partners and third parties who provide services to us or on its behalf collect your personal information to provide and offer you our products and services, or otherwise as permitted by law. Without this information, we may not be able to provide you with our 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:

'Brand Partners' refers to the various parties that promote, distribute or refer pet health insurance on behalf of PetSure or the insurance company issuing your policy. Please refer to our website for more details.

'Our', 'us' and 'we' refers to PetSure (Australia) Pty, ABN 95 075 949 923 (PetSure"), AFSL 420183 of Level 12, 465 Victoria Avenue, Chatswood, NSW 2067 Australia.

'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.

'Related Companies' has the same meaning as related bodies corporate as defined in section 50 of the Corporations Act 2001 (Cth).

'Sensitive Information' is a sub set of Personal Information defined as:

(a) information or an opinion about an individual's:

- (i) racial or ethnic origin; or
- (ii) political opinions; or
- (iii) membership of a political association; or
- (iv) religious beliefs or affiliations; or
- (v) philosophical beliefs; or
- (vi) membership of a professional or trade association; or
- (vii) membership of a trade union; or
- (viii) sexual orientation or practices; or

- (ix) criminal record; or
- (x) health information about an individual; or
- (xi) genetic information about an individual that is not otherwise health information.; or
- (xii) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (xiii) biometric templates.

'You' refers to our customers and prospective customers. It also refers 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 Privacy Act 1988 (Cth).

The Privacy Act details Australian Privacy Principles that set minimum standards for how government agencies and private sector organisations may collect, use, disclose, store, provide access to and correction of Personal Information.

We are committed to complying with the Australian Privacy Principles.

Currency and Status of our Policy

Our current privacy policy is detailed below. It is current as of and from 12 December 2019. We suggest that you read it thoroughly.

This policy may change from time to time and all changes will be posted on our website so please check it periodically. Alternatively, you can contact the Privacy Officer on +61 (02) 9842 4800 or by sending an email to privacy@petsure.com.au and request a copy of our most recent policy.

Whenever using our website 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 we offer you or you use or apply for. Typically, the details we collect and hold include your name, contact details (address, phone and fax number, email address) date of birth, gender and account 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'.

Unless it is impracticable, you have the option of interacting with us anonymously or by using a pseudonym. 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 in various ways, including via telephone, our website and our brand partners' websites, our customer portals, via digital advertising and social media, hard copy forms or email.

Whenever you deal with us, we will collect this information directly from you unless it is unreasonable or impracticable for us to do so. In some instances, we may collect your information from someone else. This may include our authorised representatives, our distributors or referrers, agents or related entities, veterinary service providers, another party involved in a claim, family members, anyone you have authorised to deal with us on your behalf, and/or our legal or other advisers.

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 or other services.

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 website, brand partners' websites or customer portals. If you use any of these tools or facilities, we may collect your Personal Information. In these circumstances, your Personal Information may be retained on our systems and used by us for the purposes of retaining an online quote and providing you with subsequent communications about your interaction.

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 collect Personal Information to provide or offer you the various products and services we administer, or otherwise as permitted by law. Such purposes include responding to your enquiries, providing you with assistance you request of us, maintaining and administering our products and services (for example processing requests for quotes, applications for insurance, underwriting and pricing policies, issuing you with a policy, managing claims, processing payments); processing your survey or questionnaire responses; market research and the collection of general statistical information using common internet technologies such as cookies; providing you with marketing information about products and services (of ours or a third party); quality assurance and training purposes; performing administrative operations (including accounting and risk management) and any other purpose identified at the time of collecting your information.

If you do not consent to us collecting and using all or some of the Personal Information we request, we may not be able to provide you with our products or services such as processing your application for insurance, your claim or any payment due to you, or providing you with a quote for insurance. It may also prevent us from maintaining or administering your policy or the provision of information regarding our products or services or those of any third party.

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 or questionnaires 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 for research and statistical analysis.

Cookies and the Collection of Information through our Website/s and Customer portal

By accessing our website and our brand partners' websites or using the customer portals you agree to cookies being stored in your browser or device. Browsers may be able to be configured to accept or reject cookies or to notify when a cookie is sent.

Cookies are small data files transferred onto computers or devices by websites to aid functionality on a website. Most browsers allow you to choose whether to accept cookies or not.

We share information provided by cookies and IP addresses with third party providers, including Google Analytics to analyse trends, administer the site, for research and marketing purposes and to improve your experience when using our sites.

The types of data we collect with these tools include:

- your device's IP address (collected and stored in an anonymised format)
- device type, operating system and browser information
- geographic location (city)
- referring domain and out link if applicable
- search terms and pages visited on our website portal
- date and time when pages were accessed on our website portal

Direct Marketing

On occasion, we, and our Related Companies, Brand Partners or other third parties with whom we have a relationship, may use your Personal Information to offer you products and services which we believe may be of interest to you.

We will not do so if you tell us you do not wish to receive any of this information please let us know by contacting the Privacy Officer on + 61 (02) 9842 4800 or by sending an e-mail to privacy@petsure.com.au.

Sharing and Disclosing your Personal Information

We never sell, rent or trade your Personal Information.

We may share your Personal Information with our Related Companies, our Brand Partners and other third parties who provide services to us or on our behalf.

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

- in accordance with this Privacy Policy,
- as provided in any privacy notice we give you;
- 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, conducting competitions, loyalty programs, marketing initiatives, promotional activities and surveys

- if disclosure is required by law or requested by a statutory authority; including the Australian Financial Complaints Authority, other dispute resolution providers, government bodies, regulators and other law enforcement agencies;
- 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, reinsurers, insurance reference bureaus, credit providers, external IT service providers, external claims data collectors and verifiers, lawyers, accountants, veterinarians and others involved in the claims handling process;
- Assessing applicants' suitability to work with us;
- where you have provided your consent - which may be given expressly or may reasonably be implied by your conduct.

Your Personal Information may also be disclosed to some of our service providers who are located overseas, including but not limited to the Philippines, South Africa, New Zealand, United States, United Kingdom and European Union. Details of who they are may change from time to time. You can contact us for details. We'll take reasonable steps to ensure they maintain compliance with the Australian Privacy Principles (APPs) if an overseas recipient is not subject to law or a binding scheme that has protections substantially similar to the way the APPs protect personal information.

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 interference and unauthorised access, modification or disclosure, including:

- Physically securing external and internal 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 'needs 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 to 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, or which was unsolicited and we identify that we would not have otherwise collected it from you.

Access to and Correction of your Personal Information

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

- information may have an unreasonable impact on the privacy of others;
- request is frivolous or vexatious;
- information relates to existing or anticipated legal proceedings and would not be accessible by the process of discovery in those proceedings;
- information would reveal our intentions in relation to negotiations in such a way as to prejudice those negotiations.

If we refuse access or to give access in the manner requested by you, we will let you know why in writing.

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 your Personal Information at no cost to you by contacting our Privacy Officer on + 61 (02) 9842 4800 or by sending an email to 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.

How to Contact Us

If you have any questions, suggestions or complaints about our privacy practices or this privacy policy, please contact the Privacy Officer on + 61 (02) 9842 4800 or by sending an email to privacy@petsure.com.au. We will respond to your question, suggestion or complaint as soon as possible.

Depending on the nature of your enquiry we may ask you to put your request in writing. To contact the Privacy Officer you can send an email to privacy@petsure.com.au or write to:

Locked Bag No. 9021
Castle Hill NSW 1765
Australia

If you are not satisfied with our response to your enquiry or complaint you can contact the Privacy Officer and request that it be reviewed by a senior staff member who will endeavour to resolve your dispute within 30 days. If you are still not satisfied, we will tell you about any options you have to refer the matter to a recognised external dispute resolution scheme of which we are a member or to the OAIC.

You can obtain information on privacy issues in Australia by visiting the website of the Office of the Australian Information Commissioner ("OAIC") located at www.oaic.gov.au or by contacting the OAIC by email at enquiries@oaic.gov.au or by calling on 1300 363 992.