



## **PetSure Privacy Policy**

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## 1. About the document

This Privacy Policy (**Policy**) applies to the Boards of PetSure Holdings Pty Ltd (**PetSure Holdings**), PetSure (Australia) Pty Ltd (**PetSure**) and their subsidiaries (**Subsidiaries**) (collectively "**the Group**" and/or "**the Boards**" as the context requires).

PetSure Holdings is authorised by APRA as a Non-Operating Holding Company (**NOHC**) and is the parent entity of the Level 2 Insurance Group. PetSure is the APRA authorised Level 1 general insurance entity. PetSure is wholly owned by PetSure Holdings.

The Group collects and handles your personal information to provide you with or offer you a range of products and services, or otherwise as required or permitted by law. Without collecting this information, we may not be able to offer or provide you with these products or services, or otherwise maintain our business or commercial relationship with you.

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.

PetSure operates in and is bound by the respective Privacy Legislation in Australia and New Zealand. Where a requirement of any applicable Privacy Legislation is inconsistent with this Privacy Policy, that legislative requirement will apply.

## 2. Policy Details

### 2.1 Definitions

In this Policy:

'Brand Partners' refer to the various parties that promote, distribute or refer pet health insurance on behalf of PetSure and/or the insurance company issuing your policy. Please refer to our website located at [www.petsure.com.au](http://www.petsure.com.au) for more details of our Brand Partners and policy issuer information.

'Our', 'us' and 'we' refers to PetSure (Australia) Pty Ltd, 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.

'Privacy Legislation' means,

- (a) if you are located in New Zealand, the Privacy Act 2020 and the information privacy principles in that Act and/or such replacement legislation, and
- (b) if you are located in Australia, the Privacy Act 1988 (Cth) and the Australian Privacy Principles in that Act, and/or such replacement legislation.

'Related Companies' has the same meaning as related bodies corporate as defined in section 50 of the *Corporations Act 2001* (Cth) and subsection 2(3) of the *Companies Act 1993* (NZ).

'Sensitive Information' is a subset 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 websites.

## 2.2 Our Commitment

PetSure recognises that your privacy is very important to you. We are committed to protecting the privacy of your Personal Information in accordance with the applicable Privacy Legislation.

The Privacy Legislation details the Australian Privacy Principles (for Australia) and the New Zealand information privacy principles (for New Zealand) 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.

## 2.3 Currency and Status of our Policy

Our current Privacy Policy is detailed below. It was last updated on 31 July 2024 and is current as of and from 31 July 2024. We suggest that you read it thoroughly. By visiting our websites, applying for, renewing or using any of our products or services, making a claim or providing us with your Personal Information, you agree to your Personal Information being collected, held, used and disclosed as set out in this Privacy Policy.

This Policy may change from time to time and all changes will be posted on our website so please check them periodically. Alternatively, you can contact our Privacy Officer on +61 2 9842 4800 or by sending an email to [privacy@petsure.com.au](mailto:privacy@petsure.com.au) and request a copy of our current policy.

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

## 2.4 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.

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 websites and use some of our online facilities without having to reveal any Personal Information. However, please see our note about cookies below.

## 2.5 How we Collect Your Personal Information

We collect your personal information in various ways, including via telephone, our website and our Brand Partners' and Related Companies' websites, our and our Related Companies' customer portals, via digital advertising and social media, hard copy forms or email.

Whenever possible, we will collect your personal 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 collection from:

- our authorised representatives, distributors or referrers, agents or related entities, insurers, veterinary service providers, insurer's appointed service providers including claims assessors
- another party involved in a claim
- your family members, or anyone you have authorised to deal with us on your behalf
- our legal or other advisers
- external dispute resolution bodies or regulators
- data partners, as authorised by the Privacy Commissioner, analytic consultants and other similar organisations, and
- any other organisation or person where you have authorised them to provide your Personal Information to us, or consented to us obtaining Personal Information from them.

For example, where someone makes an application in joint names (including your name), where it is provided to us by a third party (such as our authorised agents) with your authority or 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, you must ensure that you have received permission from that individual for us to collect, use, and share, their personal information in accordance with this Privacy Policy. If you have not done, or will not do, so, you must tell us before you provide the relevant Personal Information to us.

We are a general insurer and pet health company and we provide financial services in relation to a range of pet health insurance products. We also provide services in relation to other non-insurance pet health offerings. 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 websites, Brand Partners' or Related Companies' 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 with us, which may include direct marketing communications as outlined in the 'Direct Marketing' section of this policy below.

We will only send these communications in accordance with applicable privacy and marketing laws (such as the Australian Privacy Act (including Australian Privacy Principle 7), the Australian Spam Act 2003 (Cth)), and only where you have not opted out of receiving such communications from us.

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.

## **2.6 Why we Collect and How we Use Personal Information**

We generally collect Personal Information to provide or offer you the various products and services we administer, or otherwise as required or 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, providing to you and administering our customer loyalty or rewards programmes); providing you with online veterinary consultations and/or other veterinary or pet related services; 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.

You are always in control of the direct marketing communications which you receive from us, and you can opt-out at any time. See the section below on Direct Marketing for details on how to do this.

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, providing you with a quote for insurance, or providing you with online veterinary consultation services and/or other veterinary or pet related services. It may also prevent us from maintaining or administering your policy or providing you with 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.

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

By accessing our websites 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.

The types of data we collect with these tools include:

- your device's IP address (which is collected and stored in an anonymised format unless we need to use it to detect unauthorised access and identify potential fraud and criminal behaviour)

- 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.

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.

## 2.8 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.

You are always in control of the direct marketing communications which you receive from us, and you can opt-out at any time. You can opt-out by contacting the Privacy Officer on +61 2 9842 4800 or by sending an e-mail to [privacy@petsure.com.au](mailto:privacy@petsure.com.au).

If you provide your email address to us, you consent to receiving electronic communications (including email) from us about those products and services that may be of interest to you. You may unsubscribe from receiving electronic communications from us at any time by requesting that you be unsubscribed from the relevant electronic communication.

## 2.9 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. Where we are not your insurer, your insurer may also share your Personal Information with its related parties and service providers (please refer to your insurer's privacy policy for further information). 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 or veterinary consultation services provider, 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 (as it relates to persons located in Australia) the Australian Financial Complaints Authority,

(as it relates to persons located in New Zealand) the New Zealand Insurance & Financial Services Ombudsman, other dispute resolution providers, Australian or New Zealand government bodies, regulators and other law enforcement agencies

- if disclosure is permitted by law or by an exception in the Privacy Act 2020 (as it relates to persons located in New Zealand) or the Privacy Act 1988 (Cth) (as it relates to persons located in Australia)
- 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
- to an insurance broker acting on your behalf
- where you have provided your consent - which may be given expressly or may reasonably be implied by your conduct.

We are located in Australia, but your Personal Information may also be disclosed to some of our service providers who are located outside of New Zealand and Australia, including but not limited to the Philippines, South Africa, United States, Canada, United Kingdom and European Union. Details of who they are may change from time to time. You can contact us for details. Where your Personal Information is shared with a foreign person or organisation outside of New Zealand or Australia, we will take reasonable steps to ensure that they protect the information in a way that, overall, provides comparable safeguards to those in the relevant Privacy Legislation.

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.

## **2.10 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.

## **2.11 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 for the purposes for which it was collected or another related purpose, unless we are required or permitted 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.

## 2.12 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 applicable Privacy Legislation. For example, we may refuse access where the:

- information may involve the unwarranted disclosure of the privacy of others
- request is frivolous or vexatious
- information relates to existing or anticipated legal proceedings and would be likely to prejudice 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 2 9842 4800 or by sending an email to [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.

## 2.13 How to Contact Us

If you have any questions, suggestions or complaints about our privacy practices or this privacy policy, please contact the designated Privacy Officer on +61 2 9842 4800 or by sending an email to [privacy@petsure.com.au](mailto:privacy@petsure.com.au). We will respond to your question, suggestion or complaint as soon as possible.

You can also 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 designated 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 Office of the New Zealand Privacy Commissioner ("NZPC") and/or the Office of the Australian Information Commissioner ("OAIC"), as applicable.

You can obtain information on privacy issues in New Zealand by visiting the website of the NZPC located at <https://www.privacy.org.nz/> or by contacting the NZPC by calling on +64 0800 803 909.

You can obtain information on privacy issues in Australia by visiting the website of the OAIC located at [www.oaic.gov.au](http://www.oaic.gov.au) or by contacting the OAIC by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or by calling on +61 1300 363 992.



[PetSure.com.au](https://www.petsure.com.au)

