

## Privacy Policy

At IBL Limited, we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles, including recent amendments strengthening enforcement powers and penalties for privacy breaches. This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws and how you can access the personal information we hold and how to have that information corrected.

Our contact details for all privacy enquiries:

IBL Limited (AFSL 231203)

Level 21, 41 Exhibition Street, Melbourne 3000

Phone: 03 8508 5444

Email: [privacy@iblltd.com.au](mailto:privacy@iblltd.com.au)

### What information do we collect and how do we use it?

Through our trading entities Planned Cover, Focus Underwriting & Tasman Underwriting, and Informed by Planned Cover, we review your insurance requirements and we request the information we need to advise you about your insurance needs and management of your risks. This can include a broad range of information including your name, address, contact details and age. Some of the personal information we collect may be sensitive information, including health and wellbeing information. We only collect sensitive information when it is reasonably necessary for our functions and activities, and you have given express consent, or the collection is otherwise permitted under the Privacy Act. Sensitive information is handled with enhanced security controls and access restrictions.

We provide any information required by insurers or intermediaries that we approach on your behalf to enable the insurers or intermediaries to decide whether to insure you and on what terms, or to fund your premium and on what terms.

Insurers may in turn pass on this information to their reinsurers. Some of these companies are located outside Australia. For example, if we organise insurance terms from an overseas insurer (e.g. Lloyd's of London), your personal information may be disclosed to the insurer. If this is likely to happen, we inform you of where the insurer is located, if it is possible to do so.

When you make a claim under your policy, we assist you by collecting information about your claim. Sometimes we also need to collect information about you from others. We provide this information to your insurer (or anyone your insurer has appointed to assist it to consider your claim, e.g. loss adjusters, medical brokers etc.) to enable it to consider your claim. Again, this information may be passed on to reinsurers.

Planned Cover may use your personal information to provide you with information about products, services, events or updates that may be relevant to you.

You may opt out of receiving direct marketing communications at any time by:

- using the unsubscribe facility in communications; or
- contacting us at [privacy@iblltd.com.au](mailto:privacy@iblltd.com.au).

We will not charge for processing an opt-out request and will act on it promptly.

### What if you don't provide some information to us?

We can only fully advise you and/or assist in arranging your insurance and/or with a claim if we have all relevant information. The insurance laws also require you to provide your insurers with the information they need to be able to

decide whether to insure you and on what terms. You have a duty to disclose the information which is relevant to the insurer's decision to insure you.

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

## When do we disclose your information overseas?

If you ask us to provide insurance terms and we recommend or issue terms from an overseas insurer, we may be required to disclose the information to the insurer located outside Australia. For example, if terms are arranged through Lloyd's of London, your information may be given to a Lloyd's broker and underwriters at Lloyd's of London to decide about whether to insure you.

We will take reasonable steps to ensure overseas insurers handle personal information in accordance with Australian privacy laws, or Planned Cover will seek your informed consent prior to disclosing your information to that insurer.

Australian and overseas insurers acquire reinsurance from reinsurance companies that are located throughout the world so in some cases your information may be disclosed to them for assessment of risks and to provide reinsurance to your insurer. We do not make this disclosure. This is made by the insurer (if necessary) for the placement for their reinsurance program.

We may disclose personal information to overseas recipients including policy administration providers and IT systems providers that may be supported and maintained by organisations in New Zealand, the Philippines and Vietnam.

Overseas recipients may not be subject to privacy laws equivalent to the Australian Privacy Act. Where required, we will take reasonable steps to ensure that overseas recipients handle personal information in accordance with Australian privacy laws, or we will seek your informed consent prior to disclosure.

By engaging our services, you acknowledge and consent to the disclosure of your personal information overseas as described in this policy.

## How do we hold and protect your information?

We strive to maintain the reliability, accuracy, completeness, and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as it is reasonably necessary for the purpose for which it was collected, or as required by law.

When personal information is no longer required, we take reasonable steps to securely destroy or de-identify the information in accordance with our data retention and destruction procedures.

We hold the information we collect from you electronically. We ensure that your information is safe by protecting it from unauthorised access, modification, and disclosure. We maintain physical security over our paper and electronic data and premises, by using 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 where your information is stored.

## Notifiable Data Breaches

IBL takes data security seriously. In the event of a data breach that is likely to result in serious harm to individuals, we will comply with the Notifiable Data Breaches (NDB) scheme under the Privacy Act 1988 (Cth).

Where required, we will:

- Notify affected individuals as soon as practicable, including recommendations about the steps to take in response to the data breach;
- Notify the Office of the Australian Information Commissioner (OAIC); and
- Provide information about the nature of the breach, the information involved, and steps individuals can take to reduce potential harm.

We maintain internal procedures to prepare, identify, assess, contain, remediate and recover from data breaches.

## Will we disclose the information we collect to anyone?

We do not sell, trade, or rent your personal information to others.

We may need to provide your information to contractors who supply services to us, e.g. to handle mailings on our behalf, external data storage providers or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. However, we will take reasonable steps to ensure that they protect your information as required under the Privacy Act.

We may provide your information to others if we are required to do so by law, you consent to the disclosure or under some other circumstances which the Privacy Act permits.

## How can you check, update or change the information we are holding?

Upon receipt of your written request and sufficient information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information, please write to our Privacy Manager at the address noted above.

We do not charge for receiving a request for access to personal information or for complying with a correction request. Where the information requested is not a straightforward issue and will involve a considerable amount of time then a charge will need to be confirmed for responding to the request for the information.

In some limited cases, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

## What happens if you want to complain?

If you have concerns about whether we have complied with the Privacy Act or this Privacy Policy when collecting or handling your personal information, please write to our Privacy Manager at the address noted above.

Your complaint will be considered by us through our Internal Dispute Resolution Process. We will acknowledge your complaint within 24 hours, and we will attempt to respond with a decision within 30 days of you making the complaint. If we need to investigate your complaint and require further time, we will work with you to agree to an appropriate timeframe to investigate. We will provide you with information in relation to referring your complaint to the OAIC if we cannot resolve your complaint.

## Your consent

By asking us to assist with your insurance needs, you consent to the collection and use of the information you have provided to us for the purposes described above.

If Australian privacy laws introduce additional individual rights or obligations, we will comply with those requirements and update this Privacy Policy accordingly.

## Website information and content

The information provided on this website does not cover all aspects of the law on the relevant subject matter. Professional advice should be sought before any action is taken based upon the matters described and discussed on this site.

To the extent permitted by law, we make no representations about the suitability of the content of this site for any purpose. All content is provided without any warranty of any kind. We disclaim all warranties and conditions regarding the content including, but not limited to, all implied warranties and conditions of fitness for a particular purpose, title

and non-infringement.

We will not be liable for any damages or injury caused by, including but not limited to, any failure of performance, error, omission, interruption, defect, delay in operation of transmission, computer virus, or line failure. To the extent permitted by law we will not be liable for any damage or injury including, but not limited to, special or consequential damages that result from the use of, or the inability to use, the materials on this site.

We believe the content of this site to be accurate, complete and current, however there are no warranties as to the accuracy, completeness or currency of the content. It is your responsibility to verify any information before relying on it. The content of this site may include technical inaccuracies or typographical errors.

We reserve the right to modify the content of this site from time to time.

**Anonymous data** – We use technology to collect anonymous information about the use of our websites, for example when you browse our websites our service provider logs your server address, the date and time of your visit, the pages and links accessed, and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our websites, to better understand our clients and markets and to improve our services.

**Cookies** – In order to collect this anonymous data, we may use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer, and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. Once you leave the site, the cookie is destroyed and no personal or other information about you is stored.

**Forms** – Our websites allow visitors to submit information via self-service forms. Information submitted via the forms is encrypted in transit using HTTPS (TLS). Form submissions are delivered to internal staff mailboxes by email, which is encrypted in transit using TLS and encrypted at rest within our email service.

Where personal information is collected through our websites, we take reasonable steps to protect that information from misuse, interference and loss, including unauthorised access, modification or disclosure.

We also use your information to send you requested product information and promotional material and to enable us to manage your ongoing requirements, e.g. renewals, and our relationship with you, e.g. invoicing, client surveys etc.

We may occasionally notify you via direct marketing about new services and special offers, events or articles we think will be of interest to you. You may opt out of receiving direct marketing communications at any time by:

- using the unsubscribe facility in communications; or
- contacting us at [privacy@ibltd.com.au](mailto:privacy@ibltd.com.au).

We will not charge for processing an opt-out request and will act on it promptly.

We may use your information internally to help us improve our services and help resolve any problems.

## Tell us what you think

We welcome your questions and comments about privacy. If you have any concerns or complaints, please contact our Privacy Manager on the details listed above.

## Staff training

In accordance with our Binding Authority Agreements with capacity providers, all IBL staff are required to complete annual Australian Privacy Law training.