

Privacy Policy

At Whitbread Associates Pty Ltd trading as Whitbread Insurance Brokers, we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. 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.

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

When we arrange, manage or assist with insurance services on your behalf, we collect personal information that is reasonably necessary to understand your insurance needs, assess your risks, provide our services and manage your insurance arrangements.

The type of information we collect may include your name, contact details, address, date of birth, information about your assets, property or personal belongings, financial information, insurance history and other information relevant to arranging and managing your insurance. In some circumstances, we may also collect sensitive information, such as health information, where it is relevant to providing insurance services or assisting with a claim.

We use the information we collect to:

- Assess your insurance needs and assist with arranging appropriate insurance products;
- Obtain quotations and terms from insurers, underwriting agencies, premium funders and other insurance providers;
- Administer and manage your insurance policies;
- assist with claims and provide information to insurers and parties involved in assessing or managing claims;
- Communicate with you about your insurance arrangements and services; and improve our products, services and internal processes.
- To arrange insurance on your behalf, we may provide your personal information to insurers, underwriting agencies, premium funders and other intermediaries who require this information to assess whether to offer insurance or funding and on what terms.
- Insurers may disclose information to their reinsurers, claims service providers, assessors, loss adjusters, medical advisers and other service providers involved in providing insurance services or assessing claims. Some of these organisations may be located outside Australia. Where practicable, we will inform you if your personal information is likely to be disclosed overseas.
- When you make a claim under your policy, we may collect information about the claim from you or from other parties involved in the claim process. We provide relevant information to your insurer and parties appointed by the insurer to assist in assessing and managing the claim.
- From time to time, we may use your contact details to provide information about our services, updates, newsletters and other communications that may be relevant to you. You can opt out of receiving marketing communications from us at any time by contacting us or using the unsubscribe options provided in our communications.
- We may also use personal information internally to monitor and improve our services, conduct quality reviews, manage risks, resolve issues and meet our legal and regulatory obligations.

We may also use your personal information internally to improve our services, conduct quality reviews, resolve issues, manage risks and enhance our customer experience.

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

We can only provide our services effectively and assist you with arranging and managing your insurance if we have the relevant information needed to understand your circumstances and insurance needs.

If you do not provide information we request, this may affect our ability to assist you, obtain appropriate insurance terms, or provide services to you.

In some circumstances, we may need to disclose your personal information to overseas recipients in order to arrange or manage your insurance.

For example, if we seek insurance terms from an overseas insurer, underwriting agency or insurance market, we may be required to provide your information to those parties so they can assess your risk and determine whether to offer insurance and on what terms. This may include overseas insurance markets such as Lloyd's of London.

Where practicable, we will inform you when your personal information is likely to be disclosed overseas and the country in which the recipient is located.

Overseas insurers and reinsurers may also operate in countries outside Australia. Insurers may disclose information to their reinsurers or other service providers located overseas as part of their insurance and risk management arrangements. This disclosure is made by the insurer where required and is not controlled by Whitbread.

Where required by privacy laws, we will take reasonable steps to ensure appropriate protections are in place when personal information is disclosed overseas.

How do we hold and protect your information?

We retain personal information only for as long as reasonably necessary for the purposes for which it was collected, or as required to meet our legal, regulatory, professional or record-keeping obligations.

We hold personal information in our insurance broking systems, client relationship management systems and other business systems used to provide our services. In some circumstances, information may be archived and stored with external service providers, including secure data storage providers.

We take reasonable steps to ensure that our service providers have appropriate security measures in place to protect personal information and require them to handle information in accordance with applicable privacy obligations.

We protect personal information through a range of physical, technical and administrative safeguards, including:

- Restricting access to personal information to authorised personnel who require access to perform their roles;
- Using access controls, user identification and password protections;
- Maintaining physical security over our premises, records and systems; and
- Implementing technology and network security measures designed to protect our systems and information.

While we take reasonable steps to protect personal information, no method of electronic storage or transmission is completely secure. We continue to review and improve our information security practices to manage risks associated with holding personal information.

Will we disclose the information we collect to anyone?

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

In providing our insurance broking services, we may disclose your personal information to parties involved in arranging, administering or managing your insurance, including insurers, underwriting agencies, premium funders, claims service providers, loss adjusters, assessors, reinsurers and other parties involved in providing insurance services.

We may also disclose personal information to contractors and service providers who assist us in operating our business, such as technology providers, data storage providers, mailing providers, professional advisers and other suppliers who provide services to us. We require these providers to take reasonable steps to protect personal information and handle it in accordance with applicable privacy obligations.

In the event of a corporate transaction, such as a sale, merger, restructure, acquisition or similar arrangement, personal information may be disclosed as part of that process where permitted by law.

We may also disclose personal information where:

- You have provided consent;
- We are required or authorised to do so by law; or
- The disclosure is otherwise permitted under the Privacy Act 1988 (Cth).

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

You may request access to the personal information we hold about you or request that we correct information if you believe it is inaccurate, incomplete, out of date or misleading.

To make a request, please contact our Privacy Officer in writing and provide sufficient information to allow us to verify your identity and locate the information requested:

Whitbread Insurance Brokers, Level 5, 90 Collins Street, Melbourne VIC 3000

We will respond to your request within a reasonable timeframe and generally within 30 days. We will take reasonable steps to correct personal information where we agree it is inaccurate, incomplete, out of date or misleading.

In most cases, we will not charge you for making an access or correction request. If a request involves significant time or resources, we will advise you of any applicable charges before proceeding.

In some circumstances, we may be unable to provide access to personal information or may refuse a correction request where permitted by the Privacy Act 1988 (Cth). If this occurs, we will explain the reasons for our decision and advise you of any available options.

What happens if you want to complain?

If you have concerns about how we have collected, used, disclosed or handled your personal information, or believe we have not complied with the Privacy Act 1988 (Cth) or this Privacy Policy, please contact our Privacy Officer: Whitbread Insurance Brokers, Level 5, 90 Collins Street, Melbourne VIC 3000

We will consider your complaint through our internal complaints resolution process and aim to provide you with a response and outcome within 30 days where practicable. If we are unable to respond within this timeframe, we will keep you informed of the progress of your complaint and the reasons for any delay.

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC) for further information or to make a complaint.

Your consent

By providing us with your personal information and asking us to assist with your insurance needs, you acknowledge that we may collect, use and disclose your information for the purposes described in this Privacy Policy, including arranging, managing and administering insurance services.

Where required by privacy laws, we will obtain your consent before collecting, using or disclosing your personal information.

Website usage information and analytics

We use technology to collect information about how individuals use our website. This may include information such as your IP address or server address, the date and time of your visit, the pages and links you access, and the type of browser and device you use.

Where this information does not identify you personally, we may use it for statistical and analytical purposes, including to improve the content and functionality of our website, understand customer needs and preferences, monitor website performance and improve our services.

Where information collected through website analytics is considered personal information, we will handle it in accordance with this Privacy Policy and applicable privacy laws.

Cookies and similar technologies

We may use cookies and similar technologies on our website to support website functionality, maintain security, analyse website usage and improve our services.

Cookies and similar technologies may collect information such as your IP address, browser type, device information, pages visited and interactions with our website.

Where information collected through cookies or similar technologies is considered personal information, we will handle it in accordance with this Privacy Policy and applicable privacy laws.

Information submitted through our website

Our website allows visitors to submit information through online forms, including claim forms, quote requests and contact enquiries.

Information submitted through our online forms is collected to respond to your enquiry, assess insurance requests, assist with claims, provide requested information, manage your insurance arrangements and deliver our services.

Information submitted through online forms may be transmitted to us electronically and stored within our business systems. We take reasonable steps to protect personal information from unauthorised access, use or disclosure and limit access to authorised personnel who require the information to perform their roles.

Where you provide information through online forms, you should consider whether the method used is appropriate for the information being provided. If you have concerns about providing sensitive or confidential information electronically, please contact us to discuss alternative methods.

We may also use your information to provide information about products and services, manage your ongoing insurance requirements (including renewals), administer your account, communicate with you and improve our services.

Tell us what you think

We welcome your questions and comments about privacy. If you have any concerns or complaints, please contact the Privacy Officer:

Phone: (03) 8646 0222

Email: info@whitbread.com.au