

As at 01 November 2018

## Ian Berry Insurance Services Privacy Policy

**Ian Berry Insurance Services Pty Ltd** is an authorised representative No 259485 of Police Credit Union Ltd ACN 087 651 205 ('we', 'us', 'our') is bound by the Australian Privacy Principles Act 1988 under the Privacy Act 1988 (Cth) (**Privacy Act**).

This Privacy Policy outlines how we deal with your personal information, as well as our legal obligations and rights as to that information. If we agree with you to use or disclose any of your personal information in ways which differ to those stated in this Privacy Policy, the provisions of that agreement will prevail to the extent of any inconsistency.

### 1. Key types of information

Certain words have special meanings when used in this Privacy Policy. These are shown below.

"Personal information" means information or an opinion about an individual who is identified, or who can reasonably be identified, from the information. Although we try to make sure that all information we hold is accurate, "personal information" also includes any inaccurate information about the individual.

### 2. Collection

Wherever possible, we will collect personal information directly from you. This information will generally come from what you provide in your application for one of our products or services and supporting documentation.

We only ask for personal information relevant to our business relationship with a customer. When you apply for one of our products or services, we may request identifying information, like your name, address and other contact details and your date of birth.

### 3. Use

We may use your personal information for the purpose of providing products and services to you and managing our business. This may include:

- assessing and processing your application for the products and services we offer
- establishing and providing our systems and processes to provide our products and services to you
- executing your instructions
- charging and billing
- uses required or authorised by law
- maintaining and developing our business systems and infrastructure
- research and development
- managing our rights and obligations regarding external payment systems, or
- direct marketing.

In general, we do not use or disclose your personal information for a purpose other than:

- a purpose set out in this Privacy Policy

- a purpose you would reasonably expect
- a purpose required or permitted by law, or
- a purpose otherwise disclosed to you to which you have consented.

### 4. Disclosure

We may disclose your personal information to other organisations, for example:

- our related companies
- external organisations that are our assignees, agents or contractors
- external service providers to us, such as organisations which we use to verify your identity, payment systems operators, mailing houses and research consultants
- insurers and re-insurers, where insurance is provided in connection with our services to you
- your representative, for example, lawyer, mortgage broker, financial advisor or attorney, as authorised by you, or
- if required or authorised by law, to government and regulatory authorities.

We will take reasonable steps to ensure that these organisations are bound by sufficient confidentiality and privacy obligations with respect to the protection of your personal information.

We may disclose personal information overseas recipients only where that information is collected using the member communication platform, 'LivePerson' or for the purposes of complying with the Foreign Account Tax Compliance Act (which apply in relation to some customers with US connections). The countries where recipients of such information are likely to be based are the United States of America and United Kingdom. However, if we do disclose this information outside Australia, we will do so on the basis that the information will be used only for the purposes set out in this Privacy Policy.

We may also disclose your personal information to an individual or an organisation (a 'third party') if:

- you direct us to do so;
- you consent to the third party obtaining the information from us; or
- you consent to the third party accessing the information on our systems, and/or do anything which enables the third party to obtain access.

Your consent to a third party obtaining or accessing information may be implied from:

- your use of any service or application which a third party provides to you, or makes available to you, which involves the third party obtaining or accessing personal information held by us or organisations like us; or
- you doing anything else which enables the third party to obtain access to the information.

You should never provide or disclose any of your pass codes to any third party to enable the third party to obtain or access to your personal information. If you do so, you may breach the ePayments Code and the terms and conditions applying to the products and services we provide to you and you may be liable for any unauthorised transactions that subsequently occur. Pass codes include PINs,

As at 01 November 2018

internet and telephone banking passwords, and codes generated by security tokens.

## 5. Sensitive Information

Where it is necessary to do so, we may collect personal information about you that is sensitive. Sensitive information includes information about an individual's health, and membership of a professional or trade association.

Unless we are required or permitted by law to collect that information, we will obtain your consent.

## 6. Security

We take all reasonable steps to ensure that your personal information held on our website or otherwise, is protected from:

- misuse, interference and loss, and
- unauthorised access, disclosure or modification.

Your personal information may be held by us in paper or electronic form. All personal information is stored within secure systems which are in controlled facilities. There are restrictions on who may access personal information and for what purposes. Our employees, contractors, service providers and authorised agents are obliged to respect the confidentiality of personal information held by us.

If we suspect or believe that there has been any authorised access to, disclosure of, or loss of, personal information held by us, we will promptly investigate the matter and take appropriate action, and we will comply with any obligations in relation to notifiable data breaches that are in force under the Privacy Act.

We ask you to keep your passwords and personal identification numbers safe, in accordance with our suggestions.

When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we take reasonable steps to ensure that it is destroyed or de-identified.

## 7. Website

This section explains how we handle personal information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact our Privacy Officer, whose details are in paragraph 13 of this Privacy Policy, as there are other ways for you to provide us with your personal information.

### Visiting our website

Anytime you access an unsecured part of our website, that is, a public page that does not require you to log on, we will collect information about your visit, such as:

- the time and date of the visit
- any information or documentation that you download
- your browser type, and
- internet protocol details of the device used to access the site.

Our website also includes a number of calculators, which may require you to enter your personal details. If you save the data you enter on the calculator, this information will be stored.

## Cookies

A "cookie" is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured pages of our website (ie pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (ie public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, however doing so might prevent you from accessing the secured pages of our website.

## Email

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so. Your email address will only be used or disclosed for the purpose or purposes for which it was provided.

## Security

We use up-to-date security measures on our website to protect your personal information and your credit information. Any data containing personal information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

## Links on our website

Our website may contain links to third party websites. The terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information or credit information, you will need to obtain a copy of their privacy policy.

## Google

We use the Google Analytics cookie, Google AdWords Conversion tracker, Google Analytics Advertising Features and other Google services that place cookies on a browser across the website. These cookies help us increase the website's effectiveness for our visitors. These cookies are set and read by Google. We use data from Google Analytics Demographics, Interest Reporting and third party audience data to help us understand how people find and use our site. To opt out of Google tracking, please visit this page.

<http://www.google.com/policies/technologies/ads/>

We use AdWords remarketing to market our sites across the web. We place a cookie on a browser, and then a third party (Google) reads these cookies and may serve an ad on a third party site. You may opt out of this ad serving on Google's opt out page.

<http://www.google.com/policies/technologies/ads/>

Our cookies do not collect personal information. We also use other tracking cookies from other online advertising publishers. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information.

As at 01 November 2018

## 8. Access

You may request access to the personal information (including credit-related information) that we hold about you at any time from our Privacy Officer whose details are in paragraph 13 of this Privacy Policy.

We will respond to your request for access within a reasonable time. If we refuse to give you access to any of your personal information, we will provide you with reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access. You can contact our Privacy Officer if you would like to challenge our decision to refuse access.

We may recover the reasonable costs of our response to a request for access to personal information.

## 9. Accuracy and Correction

We take reasonable steps to make sure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. However, if you believe your information is incorrect, incomplete or not current, you can request that we update this information by contacting our Privacy Officer whose details are in paragraph 13 of this Privacy Policy.

## 10. Marketing

We may use your personal information, including your contact details, to provide you with information about products and services, including those of third parties, which we consider may be of interest to you. We are permitted to do this while you are our customer, and even if you are on the Do Not Call Register.

We may also provide your details to other organisations for specific marketing purposes.

We will consider that you consent to this, unless you opt out. You may opt out at any time if you no longer wish to receive marketing information or do not wish to receive marketing information through a particular channel, like email. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes. You can make this request by contacting our Privacy Officer whose details are in paragraph 13 of this Privacy Policy, or by 'unsubscribe' from our email marketing messages, which always include an unsubscribe option.

## 11. Changes to the Privacy Policy

We may make changes to this Privacy Policy from time to time (without notice to you) that are necessary for our business requirements or the law. Our current Privacy Policy is available on our website.

## 12. Questions and Complaints

If you have any questions, concerns or complaints about this Privacy Policy, or our handling of your personal information, please contact our Privacy Officer whose details are in paragraph 13 of this Privacy Policy. You can also contact the Privacy Officer if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible. We will aim to deal with your complaint at the source of your complaint. If you are not satisfied with the response you receive, please let us know and our Privacy Officer will investigate

further and respond to you.

If you are still not satisfied, you can contact external bodies that deal with privacy complaints.

These are the Australian Financial Complaints Authority (AFCA) which is our external dispute resolution scheme, the Federal Privacy Commissioner or, in the case of insurance-related privacy complaints, the Australian Prudential Regulation Authority. Any of these bodies may forward your complaint to another external dispute resolution body if it considers the complaint would be better handled by that other body.

### Australian Financial Complaints Authority

Mail	Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001
Telephone	1800 931 678 (free call) 9am-5pm AEST
Email	info@afca.org.au
Website	www.afca.org.au

### Federal Privacy Commissioner

Mail	GPO Box 5218, Sydney NSW 2001
Telephone	1300 363 992
Website	www.oaic.gov.au

### Australian Prudential Regulation Authority

Mail	GPO Box 9836, Sydney NSW 2001
Telephone	1300 55 88 49
Website	www.apra.gov.au

## 13. Privacy Officer

Our Privacy Officer's contact details are:

Mail	The Privacy Officer Ian Berry Insurance Services PO Box 6074 Halifax St Post Office Adelaide SA 5000
Telephone	1300 131 844
Email	privacyofficer@ianberry.com.au

## Disclaimer

This Privacy Policy is provided for the purposes of information only. While we have taken care to ensure that it is accurate and current, we provide no guarantee as to its accuracy or currency. We accept no liability for loss or damage suffered as a result of reliance on the information provided in this Privacy Policy.