



## **PRIVACY POLICY**

At SMART Business Insurance, we are committed to protecting your privacy in accordance with the Privacy Act 1998 (Cth) including the Privacy Amendment (Enhancing Privacy Protection) Act 2012 . This Privacy Policy describes our current policies and practices in relation to the handling and use of personal information.

### **WHAT INFORMATION DO WE COLLECT AND HOW DO WE USE IT?**

We will collect personal information for purposes which are relevant to providing and administrating our financial products and services.

To enable us to provide advice on and arrange financial services, we collect the information needed by ourselves to ensure appropriate advice to you and information required by product suppliers. We will usually provide some or all of this information to our product suppliers. Some of these companies may be located outside Australia.

When a claim is made under an insurance policy, to enable us to assist in the claim process, we and our representative and those of the insurer (including loss adjusters, investigators, medical advisors and lawyers) collect information about the claim, some of which may be personal information. We may collect the information from you or from third parties.

We provide this information to the insurer and or their agents and those appointed to assist you in making a claim. Again this information may be passed on to your underwriters and reinsurers.

We may use your personal information internally, or with the assistance of third parties, to help us improve our services and help resolve any problems.

We, or related companies, may use your personal information for marketing purposes. If you would rather not receive this information or do not wish to receive it electronically, email or write to us.

### **WHAT IF YOU DON'T PROVIDE SOME INFORMATION TO US?**

We can only apply for and arrange financial services products if we have all relevant information. *We can only fully advise you if we have all relevant information.* The insurance laws also require insured to provide your insurers with all the information required by the end insurer to help them decide whether to insure you and on what terms. Credit Providers also require specific to help them assess any credit applications that is been facilitated on your behalf.

## HOW DO WE HOLD AND PROTECT YOUR INFORMATION?

We hold the information we collect from you in our computer system, our service suppliers computer systems, on the Cloud and in our hard copy files. We protect your information by following the usual security procedures expected by our clients.

## WILL WE DISCLOSE THE INFORMATION WE COLLECT TO ANYONE?

We may disclose your information to:

- Financial Institutions, other Australian Financial Service Licensees, Insurers, Underwriters, Underwriting agencies, Wholesale brokers and Reinsurers (for the purpose of seeking recovery from them or to assist them to assess insurance risk);
- Premium funders / Credit providers for the purpose of gaining quotation on and arranging funding of your insurance premiums / financial investments;
- Related companies in our Group;
- Other companies offering financial services including: income insurance, life insurance, loans, finance, financial investments;
- An investigator, Assessor, State or Federal Health Authorities, Lawyers, Accountants, Medical practitioners, Hospitals or any other professional advisors (for the purpose of investigating or assessing your claim);
- A lawyer or recovery agent (for the purpose of defending an action by a third party against you or for the purpose of recovery costs including your access);
- Contractors who supply services to us, e.g. to handle mailing on our behalf; CRM supplier, IT supplier, software providers, marketing agency, client review management software provider, independent client review platform
- An immediate family member or
- Other companies in the event of corporate sale, merger, reorganization, dissolution, amalgamation or similar event

However, we will do our best to ensure that they protect the information in the same way that we do. We may provide your information to others if we are required to do so by law or under some unusual other circumstances which the Privacy Act permits. We do not sell, trade, or rent your personal information to unrelated companies.

## HOW CAN YOU ACCESS, CHECK, UPDATE OR CHANGE THE INFORMATION WE ARE HOLDING?

Upon receipt of your written request from you and enough 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.

If you wish to access or correct your personal information please write to our Managing Director, Mark Vanzo at Smart Business Insurance Pty Ltd Level 11, 484 St Kilda Rd Melbourne 3004. We do not charge for receiving a request for access to personal information or for complying with a correction request.

We do however reserve the right to charge you for all reasonable costs and outgoing specifically incurred in meeting your request for information. 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.

## 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.

## COMPLAINTS ABOUT PRIVACY

Should you have a complaint regarding a breach of privacy, we will handle the matter in accordance with our formal complaints handling procedures.

Your complaints can be lodged over the phone, via mail or email or you may wish to make an appointment with us at a convenient time and location. We will do all that is reasonable in the circumstances to address your complaint.

## INFORMATION SENT OVERSEAS

In certain situations it is likely that some or all of the Personal Information that you provide to us may be disclosed to businesses that operate overseas. This will occur where the product provider / intermediary is based overseas – e.g. Lloyds of London syndicates or Brokers and other overseas based Insurers and Intermediaries, where administrative or marketing functions are performed for us by an overseas supplier, and where we utilize “Cloud Computing” services that are situated outside Australia.

In such cases we commit to making reasonable enquiries to ensure that these organisations comply with their local privacy legislation where such legislation is comparable to the Australian Legislation or General Data Protection Regulation (GDPR) to and to comply with the key components of Australian Privacy Legislation or General Data Protection Regulation (GDPR) in cases where their local legislation is considered inadequate or non-existent.

## WEBSITE INFORMATION AND CONTENT

*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 website, for example when you browse our website 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 website, 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 Website may allow visitors to submit information via Self-Service forms (Quotes, Claim Forms, Employment and Contact request). The information submitted via the Forms is encrypted – an option is available for claim forms to be downloaded in PDF format for faxing. Should you be concerned about confidentiality of any of the policy or claims information, please do not hesitate to lodge this information with us via fax, phone or email.

We may also use your contact information that you supply on this website 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, or our related companies, may also notify you via direct marketing about new services and special offers, events or articles we think will be of interest to you. We may send you regular updates by email or by post on insurance, finance or investment matters. If you would rather not receive this information or do not wish to receive it electronically, email or write to us.

You may also receive financial services offers including: income insurance, life insurance, loans, finance, financial investments from other companies that we think will be of interest to you. If you would rather not receive this information or do not wish to receive it electronically, email or write to us.

We may also 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. We will address all your questions, comments or complaints. If you have any concerns or complaints regarding the breach of privacy, please contact our Managing Director Mark Vanzo at Smart Business Insurance Pty Ltd Level 3, 9-11 Claremont Street, South Yarra, 3141 or call 1300 542 573.