

# IMALIA

## Privacy Policy



## IMALIA PRIVACY POLICY

At Imalia, we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

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

When we advise you about your financial (insurance) affairs, we ask you for the information we need to understand your financial (insurance) situation, needs and objectives. This can include a broad range of information ranging from your name, address, contact details, age to other information about your personal affairs including your assets, personal belongings, financial situation, health and wellbeing. We provide any information that the insurers or intermediaries whom we ask to quote for your insurances require to enable them to decide whether to insure you, 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 seek insurance terms from an overseas insurer (eg Lloyds 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, eg loss adjusters, medical officers etc) to enable it to consider your claim. This information may be passed on to reinsurers.

From time to time, we will use your contact details to send you direct marketing communications including offers, updates and newsletters that are relevant to the services that we provide. We always give you the option of electing not to receive these communications in the future. You can unsubscribe by notifying us and we will no longer send this information to you.

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

## 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 received a cookie so you can decide whether to accept it. Cookies allow the website to recognize your computer when you return in the future.

We strive to keep the personal information that you provide to us is safe and secure. We take all reasonable precautions to protect the information we hold about you from misuse, interference and loss; and from unauthorised access, modification or disclosure. Our security measures included, but are not limited to:

- + Requiring our staff to use passwords when accessing our systems.
- + We have cryptographic network protocols in place with private keys to protect information sent during internet transactions.
- + We employ firewalls, intrusion prevention systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems.
- + We use dedicated secure and encrypted private networks when we transmit electronic data across our networks.

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

We may occasionally notify you about new services and specials 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 and other matters. If you would rather not receive this information, or do not wish to receive it electronically, email or write to us. We may use your information internally to help us improve our services or resolve any problems.

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

We can only fully advise you and assist in arranging your insurance, or a claim, if we have all relevant information. The insurance laws also require you to provide your insurers with the information they need in order to be able to decide whether to insure you and on what terms.

You have a duty to disclose the information that is relevant to the insurers' decision to insure you.

## **WHEN DO YOU WE DISCLOSE YOUR INFORMATION OVERSEAS?**

If you ask us to seek insurance terms and we recommend an overseas insurer, we may be required to disclose the information to the insurer located outside Australia. For example, if we recommend a policy provided by Lloyds of London, your information may be given to the Lloyds broker and underwriters at Lloyds of London to make a decision about whether to insure you.

We will tell you at the time of advising on your insurance if they are overseas and in which country the insurer is located. If the insurer is not regulated by laws that protect your information in a way that is similar to the Privacy Act, we will seek your consent before 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 in order to provide reinsurance to your insurer. We do not make this disclosure; this is made by the insurer if necessary for the placement of their reinsurance program.

## **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 is reasonably necessary for the purpose for which it was collected or to comply with applicable legal or ethical reporting, or document retention requirements.

We hold the information we collect from you in secure computer storage facilities. We keep your information safe by locks and security systems, passwords, antivirus mechanisms, auditing and data integrity checks. In some cases, your file is archived and sent to an external data storage provider for a period of time. We only use storage providers located in Australia who are also regulated by the Privacy Act.

## **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 or partners who supply services to us, or our clients e.g. to handle mailings on our behalf, external data storage providers, IT service providers, financial services providers, or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. However, we will do our best to ensure that they protect your 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.

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

Upon receipt of your written request 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, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information please write to Imalia Privacy Officer, Suite 3, Level 21 Gold Fields House, 1 Alfred Street, Sydney NSW 2000. Telephone 1300 302 952.

We do not charge for receiving a request for access to personal information or for complying with a correction request. We do not charge for providing access to personal 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. <sup>4</sup>

## 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 Imalia Privacy Officer, Suite 3, Level 21 Gold Fields House, 1 Alfred Street, Sydney NSW 2000. Telephone 1300 302 952.

Your complaint will be considered by us by our internal complaints resolution process and we will try to respond with a decision within 30 days of you making the complaint.

## YOUR CONSENT

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

## TELL US WHAT YOU THINK

We welcome your questions and comments about privacy. If you have any concerns or complaints, please contact: Imalia Privacy Officer Suite 3, Level 21 Gold Fields House, 1 Alfred Street, Sydney NSW 2000. Telephone 1300 302 952.

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

We use the information you provide to arrange your insurances and ancillary services. We provide this information to the Underwriting Agencies and Insurers who arrange and provide your Insurance and providers of ancillary services. Otherwise we do not provide this information to anyone else unless we are required to do so by Law.

To enable us to quote on and insure risks, we collect the information we need to assess the risk and whether and on what terms we will insure it. We may need to provide this information to our risk carriers and reinsurers. Some of these companies may be located outside Australia.

When a claim is made under the policy, to enable us to assess the claim, we and our representatives (including loss adjustors, investigators, medical advisers and lawyers) collect information about the claim, some of which may be personal information. We may collect the information from our insured or from third parties. We provide this information to those we have appointed to assist us to consider the claim. Again this information may be passed on to our risk carriers and reinsurers.

We may use your personal information internally to help us improve our services and help resolve any problems. We also use your information to send you requested product and promotional material and to enable us to manage your ongoing requirements (ie, invoicing, renewals, and customer surveys). We may do so by mail or electronically unless you tell us you do not wish to receive electronic communications.

We may also notify you about new services and any special offers, events that may be of interest to you. We may send you regular updates, newsletters, by email or post on insurance matters. If you would rather not receive this information please notify us.

You can check the information we hold about you at anytime.

## **THE DATA WE COLLECT**

### **Emails and Electronic Forms**

We will record your email address only if you send us a message. Your personal information will only be used for the purposes for which you have provided it. Your email address will not be added to a mailing list, unless you have provided it to us in order to subscribe to one of our subscription services.

Where you choose to send us a completed electronic form that includes your personal details, we do collect personally identifiable information, such as name, address and email address.

The information collected by email or electronic forms will be used only for the purpose for which you provided it, and we will not disclose it without your consent, except where authorised or required by law.

## **THE DATA WE COLLECT - BROWSING (CLICKSTREAM DATA)**

When you look at this web site, our server makes a record of your visit and logs the following information:

- + the previous site visited.
- + the user's server address.
- + the user's top level domain name (for example .com, .gov, .au, .uk etc).
- + the date and time of visit to the site.
- + the pages accessed and documents viewed.
- + the type of browser used.

The data listed above is collected for the following purposes:

- + web site and system administration, including monitoring to prevent security breaches.
- + enhancement of the web site to the user's need.
- + research and development.

No attempt will be made to identify users or their browsing activities, except in the unlikely event that a law enforcement (or other government) agency exercises a legal authority to inspect ISP logs (eg, by warrant, subpoena, or notice to produce).

## **COOKIES**

In order to collect this Browsing data we may use 'cookies'.

A cookie is a small amount of information stored on your computer by our web site server. It is information that your web browser sends back to our web site server whenever you visit it again. We use cookies to 'remember' your browser between page visits. In this situation, the cookie identifies your browser, not you personally. No personal information is stored within Imalia's cookies.

## **PUBLISHING PERSONAL INFORMATION**

We will only publish personal information on this site if it has been collected for this purpose with your knowledge or if you have consented to the disclosure. When giving such consent you should be aware that information published on this site is accessible to millions of users from all over the world, that it will be indexed by search engines and that it may be copied and used by any web user. This means that, once the information is published on this site, we will have no control over its subsequent use and disclosure.

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

We can only issue insurance cover and assess claims under the policy if we have all relevant information. The insurance laws also require insured's to provide us with all the information we need in order to be able to decide whether to insure and on what terms.

## **HOW DO WE HOLD AND PROTECT YOUR INFORMATION?**

We hold the information we collect from you in secure computer storage facilities. We keep your information safe by locks and security systems, passwords, antivirus mechanisms, auditing and data integrity checks.



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 or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. However, we will do our best to ensure that they protect your information in the same way that we do.

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