

Members Protect Privacy Policy

Your privacy is important to us and we are committed to safeguarding your privacy and the confidentiality of your personal information in accordance with the Australian Privacy Principles and the privacy law set out in the *Privacy Act 1988* (Cth) (Privacy Act).

This Privacy Policy (Policy) describes how we comply with the requirements of the Privacy Act, including the Australian Privacy Principles.

This Policy explains how we collect, hold, use and disclose your personal information. It also describes your right to access and correct your personal information held by us.

In this Policy “we”, “us” or “our” means ABC Insurance Pty Ltd (ABN 11 661 288 713, AFSL 543444) trading as ABC Insurance and Members Protect.

Why do we collect and hold personal information?

We collect, hold and use your personal information so that we can:

- Provide you with our insurance products and services.
- Assist you with underwriting and practice advisory enquiries.
- Assist you with claims related enquiries and notifications.
- Handle claims for you, which includes disclosing personal information to instruct, obtain advice from and negotiate with external third parties.
- Comply with legal and regulatory requirements.
- Advise you of our related products or services which may be of interest to you.

By applying for or renewing our products or services and communicating with us through our website, by phone or otherwise in writing, you agree to your information being collected, held, used and disclosed as set out in this Policy.

You do not have to provide us with your personal information, but if you do not then we may be unable to provide our products or services to you.

What kind of personal information do we collect and hold?

We collect personal information as defined in the Privacy Act. Examples of personal information that we collect, hold and use include a person's name, address, phone number, email address, contact details and employment information. Personal information may also



be contained in documents, photographs, recordings, and web pages and communications relevant to the operation of our products and services.

We may also collect and hold sensitive personal information such as information about an individual's health, association memberships, or criminal record; however, this only occurs on an incidental unsolicited basis or else in relation to a claim.

The personal information that we collect and hold is limited to the minimum information required for us to establish and maintain communications with individuals in the course of the activities stated on our website.

Information collected when accessing our websites

De-identified information

We use various technologies to collect de-identified information about the use of our websites. This information is not personal information and does not identify you. Our use of this information is for statistical purposes and to improve our websites and services.

We may collect some of this information using cookies (a small text file that a website places on your device to store information). Cookies help our websites remember information about your visit, like your locale, language and other settings, and to help manage communications between your computer and our servers ('affinity' cookies).

You can adjust your browser settings to be notified when you receive a cookie and decide if you want to accept it. Please note that if you choose to disable some categories of cookies that we use, your website experience may be reduced and some functionality may be unavailable to you or you may be prevented from using our websites altogether.

We may also collect some of this information using web beacons embedded in web pages or emails. Beacons are unobtrusive images or other objects embedded in a web page or email, such that whenever that page or email are viewed a request is made to our servers or those of a third-party web analytics service provider. These beacons create logs that include the date and time, beacon identifier, the IP address the request was sent from, and the type and version of the client computer's web browser and operating system.

Our websites also automatically log all access and content requests. These logs include the date and time, the website URL requested, the IP address the request was sent from, and the type and version of the client computer's web browser and operating system.



Identifiable information

When you are signed into our online insurance portal then our website logs also record the specific user account associated with each access or content request. This user account is linked to your personal details that you provided to us.

These identifiable logs are collected and securely held to help ensure the security and proper operation of our websites and related systems and in accordance with applicable laws and compliance standards.

How do we collect your personal information?

We collect personal information directly from you with your consent, through your use of our website and online applications, when you communicate with us by teleconferencing software, telephone or in writing, or otherwise in connection with our products and services.

We also collect personal information indirectly from you when you provide such information to a third-party service provider who we engage to assist with the investigation of a claim or other notification by you, or where you consent to a third-party disclosing such information to us.

How we hold and use personal information – data security

We will take all reasonable steps, including measures required by law, to ensure your information is protected and secure.

Once collected, your personal information is held in electronic data stores or databases that are securely encrypted at rest and in transit. We may also hold electronic copies of documents containing personal information, for example; queries, complaints, CVs, membership application forms, claims histories, and other relevant documents.

Only authorised staff and systems have access to your personal information. All staff use individual accounts secured with strong passwords and protection mechanisms that comply with relevant industry and government security standards and guidelines.

Our IT systems may use your personal information to send you emails or SMS text messages or use an authorised application on your mobile phone to authenticate you.

When do we disclose your personal information to others?

Where appropriate and reasonable for the provision of our products and operation of our services we may disclose your personal information to:

- third-party service providers engaged by us, including but not limited to:
 - lawyers;
 - investigators;
 - loss/claims assessors;
 - professional experts (including medical practitioners for some claims)
 - other insurers when dealing with a claim;
 - consultants;
 - IT service providers;
 - payment service providers
 - premium funders;
 - marketing agencies and distribution providers (i.e. mailing houses);
 - accountants;
 - actuaries;
 - auditors;
- your law society (for the issuance of your practicing certificate);
- any joint insured listed on your insurance policy;
- Office of the Information Commissioner (OAIC), if requested or required to do so;
- complaint and dispute resolution bodies (e.g. AFCA Australian Financial Complaints Authority);
- other statutory authorities or government departments and agencies; and
- the insurer underwriting your insurance policy.

We will not disclose to any other third parties outside of these any of your personal information without your consent, unless we are required by law or under a court or tribunal order, or if a permitted general situation exists under the Privacy Act.

Third Party Privacy Policies

The insurer underwriting our professional indemnity insurance policy is Liberty Specialty Markets. Refer to their Privacy Notice on our website at <https://www.abcinsurance.net.au/Liberty-privacy-notice>.



Will we send your personal information outside Australia?

If it is necessary for your personal information to be disclosed to or accessed by a person outside Australia, we will take all reasonable steps to ensure that the person handles your personal information in accordance with equivalent local legislation to this Policy and the Australian Privacy Principles.

Your personal information may be disclosed to or accessed by the underwriter of your insurance policy, such as in the case of a claim being made. Our underwriting insurers are owned by entities incorporated and based in the USA or UK, and in these cases your personal information may be accessed by appropriate and authorised persons located in those countries.

Communications and marketing

We may use your personal information, such as your email address, to contact you or send you important notices about our specific products and services to which you are subscribed. This may include renewal notices, changes in circumstance notifications, or our responses to your queries or submissions to us.

We may also use your personal information to send you marketing material that offer you related products and services we believe may be of interest to you.

Every marketing communication we send you will include instructions on how to opt out of receiving any further marketing material from us. You can also opt out of receiving any further marketing material from us by emailing us at unsubscribe@abcinsurance.net.au at any time.

Accessing and correcting personal information held by us

We will take all reasonable steps to ensure the information we collect and hold about you is accurate, complete, and up to date.

You have the right to access your personal information held by us. You can make a request for access by contacting the Privacy Officer at privacy@abcinsurance.net.au. We will respond to your request for access to personal information within 30 days.



If you believe that personal information held by us is inaccurate, out of date, incomplete, irrelevant, or misleading, you have the right to request a deletion or correction to that information, by contacting the Privacy Officer at privacy@abcinsurance.net.au.

Once requested we shall respond to you and propose a reasonable timeframe within which to consider and determine your request.

We will confirm with you all corrections or deletions made to your personal information.

If there is a reason why we are unable to agree to your request for access or we are unable to agree with your request to correct or delete any personal information, we will provide you with the reason for our decision and with details on how you may dispute our decision or request a review of our decision.

Complaints

If you wish to make a complaint, including about a breach of this Policy, please contact the Privacy Officer at ABC Insurance (via email to privacy@abcinsurance.net.au) who will communicate with you, investigate your complaint and reply to you with a determination.

If you are not satisfied with the determination, you can contact us to discuss your concerns or else refer your complaint to the Office of the Information Commissioner (OAIC). The OAIC's contact details are on its website at www.oaic.gov.au.

Changes to this Policy

We may change or update this Policy from time to time. You can obtain a copy of our latest Policy from our website at <https://www.abcinsurance.net.au/privacy-policy> or by emailing us at privacy@abcinsurance.net.au.

This Policy was last updated on 15 May 2024.