



## **OUR PRIVACY POLICY**

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

This Privacy Policy applies to personal information collected by us and explains how we collect, use, disclose and handle it as well as your rights to access and correct your personal information and make a complaint for any breach of the APPs.

### **What is Personal Information?**

The Privacy Act defines personal information to mean:

Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether recorded in a material form or not.

### **Sensitive information is a subset of personal information and means:**

Information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information or templates.

### **What kinds of personal information do we collect and hold?**

The kinds of personal information we collect and hold vary but generally can include:

- Your contact information such as full name (first and last), e-mail address, current postal address, delivery address (if different to postal address) and phone numbers;
- Details relating to your employment (if applicable)
- Your date of birth
- Insurance history;
- Payment or billing information, (including but not limited to bank account details, direct debit, credit card details, billing address, premium funding and installment information).

The type of sensitive information we may collect generally includes:

- criminal record;
- health information; and
- membership of a professional or trade association.

## **Personal information ?**

We only collect personal information by lawful and fair means and where it is reasonably necessary for, or directly related to, one or more of our functions or activities.

Unless it is unreasonable or impracticable for us to do so, or as provided otherwise under this Privacy Policy, we will collect your information directly from you or your agents.

If we collect details about you from someone else, we will, take reasonable steps to make you aware of the collection in accordance with the APPs.

We hold the personal information we collect within our own data storage devices or with a third party provider of data storage. We discuss the security of your personal information below.

## **The purposes for which we collect, hold, use and disclose your personal information**

We collect, hold, use and disclose your personal information where it is reasonably necessary for, or directly related to, one or more of our functions or activities.

We do not use or disclose personal information for any purpose that is unrelated to our services and that you would not reasonably expect (except with your consent). We will only use your personal information for the primary purposes for which it was collected or as consented to.

If we do propose to disclose or use your personal information other than for the purposes listed above, we will first seek your consent prior to such disclosure or use.

If we give third parties (including their agents, employees and contractors) your personal information, we require them to only use it for the purposes we agreed to.

## **What do we expect of you/ third parties we deal with when providing personal information about another person?**

Unless an exemption applies or we agree otherwise, you must meet the requirements of the Privacy Act, when collecting, using, disclosing and handling personal information on our behalf.

You must also ensure that your agents, employees and contractors meet the above requirements.

## **How do we manage the security of your personal information?**

We take reasonable steps to ensure that your personal information is safe.

We retain personal information electronically with us or our appointed data storage provider(s). You will appreciate, however, that we cannot guarantee the security of all transmissions of personal information, especially where the internet is involved.

Notwithstanding the above, we endeavor to take all reasonable steps to:

- protect any personal information that we hold from misuse, interference and loss, and to protect it from unauthorised access, modification or disclosure both physically and through computer security measures;
- destroy or permanently de-identify personal information in accordance with the Privacy Act.

We maintain computer and network security; for example, we use firewalls, anti-virus & anti-spam (security measures for the internet) and other security systems such as user identifiers and passwords to control access to computer systems.

## **Data quality**

We take reasonable steps to ensure that personal information is current, accurate, up-to-date and complete whenever we collect or use or disclose it.

Throughout our dealings with you we will take reasonable steps to confirm the details of your personal information we hold and ask you if there are any changes required.

The accuracy of personal information depends largely on the information you provide to us, so we rely on you to:

- let us know if there are any errors in your personal information you become aware of; and
- keep us up-to-date with changes to your personal information (such as your name or address).

## **Access to and correction of your personal information**

You are entitled to have access to any personal information relating to you which we possess, except in some exceptional circumstances provided by in law. For example, we may refuse access where the:

- information may have an unreasonable impact on the privacy of others;
- request is frivolous or vexatious;
- information relates to existing or anticipated legal proceedings and would not be accessible by the process of discovery in those proceedings;
- information would reveal our intentions in relation to negotiations in such a way as to prejudice those negotiations.

Where providing access would reveal evaluative information generated by us in connection with a commercially sensitive decision-making process, we will provide an explanation for the decision rather than direct access to the information.

If we refuse access or to give access in the manner requested by you we will let you know why in writing and provide you with details about how to make a complaint about the refusal.

If we make a correction to your personal information we may retain a copy of the previous information for our records or as required by law.

If you wish to access your personal information please write to Privacy Officer, iaAnyware, Suite 8 Harbour Point, Santa Barbara Road, HOPE ISLAND QLD 4212.

In most cases we do not charge for receiving a request for access to personal information or for complying with a correction request.

## **Do we transfer information overseas?**

Any personal information provided to iaAnyware may be transferred to, and stored at a destination outside Australia, including but not limited to New Zealand, Singapore, United Kingdom and the United States of America. Details of the countries we disclose to may change from time to time. Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

When we send information overseas, in some cases we may not be able to take reasonable steps to ensure that overseas providers do not breach the Privacy Act and they may not be subject to the same level of protection or obligations that are offered by the Act. By proceeding to acquire our services and products you agree that you cannot seek redress under the Act or against us (to the extent permitted by law) and may not be able to seek redress overseas. If you do not agree to the transfer of your personal information outside Australia, please contact us.

## Sale or restructure of business

In the future we may consider the sale or restructure of our business or the purchase of the business. In such circumstances it may be necessary for your personal information to be disclosed to permit the parties to assess the sale or restructure proposal for example through a due diligence process.

We will only disclose such of your personal information as is necessary for the assessment of any sale or restructure proposal and subject to appropriate procedures to maintain the confidentiality and security of your personal information. In the event that a sale or restructure proceeds, we will advise you accordingly.

We may use your personal information, including any email address you give to us, to provide you with information and to tell you about our products, services or events or any other direct marketing activity (including third party products, services and events which we consider may be of interest to you). Without the limitation just described, if it is within your reasonable expectations that we send you direct marketing communications given the transaction or communication you have had with us, then we may also use your personal information for the purpose of sending you direct marketing communications which we may consider may be of interest to you. We may request our related parties to contact you about services and products that may be of interest to you.

## Our website

You are able to visit our website without providing any personal information. We will only collect personal information through our websites with your prior knowledge for example where you submit an enquiry or application online.

Email addresses are only collected if you send us a message and will not be automatically added to a mailing list.

## **If you do have a complaint about privacy we ask that you contact our office first to help us to assist you promptly.**

In order to resolve a complaint, we:

- Will liaise with you to identify and define the nature and cause of the complaint;
- May request that you detail the nature of the complaint in writing;
- Will keep you informed of the likely time within which we will respond to your complaint;
- Will inform you of the reason for our decision in resolving such complaint; and
- Keep a record of the complaint and any action taken in the Register of Complaints.

If you have a complaint please email us at [info@iaanyware.net](mailto:info@iaanyware.net) and our Privacy Officer will then attempt to resolve the issue or complaint.

When we make our decision, we will also inform you of your right to take the matter to the Office of the Australian Information Commissioner (OAIC) if you are not satisfied. In addition if you have not received a response from us of any kind to your complaint within 30 days, then you have the right to take the matter to the OAIC (contact details are provided below).

You also have a right in limited circumstances to have your privacy complaint determined by the Australian Financial Complaints Authority (AFCA). AFCA can determine a complaint about privacy where the complaint forms part of a wider dispute within the AFCA Terms of Reference between you and us or when the privacy complaint relates to or arises from the collection of a debt. We are bound by AFCA determinations, provided the dispute falls within the AFCA Terms of Reference. Unless exceptional circumstances apply, you have two years from the date of our letter of decision to make an application to the AFCA for a determination. You can access the AFCA dispute resolution service by contacting them at:

Australian Financial Complaints Authority GPO Box 3, Melbourne, Victoria 3001.



1800 931 678



[www.afca.org.au](http://www.afca.org.au)



[info@afca.org.au](mailto:info@afca.org.au)

If you would like further details of our Privacy Complaints Handling Procedure, please contact our Privacy Officer using the contact details listed above.

We recommend that you retain this information for future reference.

**This Privacy Policy is current from 22<sup>nd</sup> February 2018.** In the event that this Privacy Policy or any part thereof is amended or modified in the future, the revised version will be available by contacting our office or on our website.

You can also obtain information on privacy issues in Australia on the Office of the Australian Information Commissioner (OAIC) website at [www.oaic.gov.au](http://www.oaic.gov.au) or by contacting the OAIC by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or by calling on 1300 363 992.