



Privacy Policy

1. Open and transparent management of personal information

Your privacy is important to Insurance Australia Limited trading as WFI (WFI, we, us, our). We are committed to ensuring that information we hold about you is held securely and that your confidentiality is protected.

We are bound by the Australian Privacy Principles (APPs) of the *Privacy Act 1988* (Cth). We are committed to ensuring that all our business dealings comply with the APPs, and acknowledge the importance of keeping personal details for individuals confidential and secure.

To this extent, this privacy policy aims to explain the application of the APPs to the particular business of WFI. Consequently, this privacy policy should be read in conjunction with the APPs. To the extent that there is any direct inconsistency between the APPs and this privacy policy, the APPs will prevail. Questions about the APPs may be directed to the Office of the Australian Information Commissioner whose website details are: www.oaic.gov.au and telephone number is: 1300 363 992.

We are committed to the APPs and support:

- fair, transparent and open collection practices;
- processes that ensure personal information is accurate, complete and current;
- an individuals' rights to see, and where necessary, correct personal information about themselves; and
- limiting the use of personal information.

This privacy policy explains how we treat personal information that we hold about you. It details the type of personal information we collect, how we may use that information, to whom we permit access and how we protect that personal information.

2. Collection of solicited personal information

We collect information which is reasonably necessary to provide our services for underwriting and administering your insurance, claims handling, market and customer satisfaction research and to develop and identify products and services that may interest you. Collection will only take place by lawful and fair means.

We collect information regarding you, other people, any risk to be insured, previous claims or losses, details of previous insurances and insurers, credit status and any matters relevant to the insurance to be provided.

We collect personal information directly or indirectly by telephone, email, facsimile, online, post, external agencies and in person from you. We may also collect personal information from another person or persons if it is unreasonable or impracticable to collect it from you.

If we collect information pursuant to a law, regulation, or court order then we will advise you of the law or the court order applicable.

If you fail to provide us with personal information then this insurance may not meet your needs. If you fail to provide information further to any duty of disclosure you have to us, then there may be no cover or a reduced cover for any claim made and in some cases the policy may also be avoided.

At the time of collection or as soon as practicable thereafter we will notify you or make sure you are aware of our identity, contact details, the purposes for which we collect the information, the consequences of not providing the information, how you can access and correct the information, that we will disclose the information overseas and the countries we will so disclose to.

Regardless of whom we collect your personal information from, we will be fair and open and we will not make any unreasonably intrusive enquiries. You should be particularly aware that we may consider it necessary to arrange for investigators to collect your personal information in relation to a service or product we have provided to you.

When entering an insurance contract, you owe a duty of utmost good faith to the insurer, in this case WFI. This is imposed by the *Insurance Contracts Act 1984* (Cth).

3. Use and disclosure of solicited information

We may disclose your personal information to WFI related companies, our agents, overseas service providers, other insurers, reinsurers, mailing houses and document service providers, financial institutions, auditors, insurance and claim reference agencies, recovery agents, credit agencies, lawyers, accountants, loss assessor and adjusters, financial or investigative service providers, internal dispute resolution officers and dispute resolution providers such as the Australian Financial Complaints Authority.

We use and disclose your personal information for the purposes of providing insurance, administration of your insurance policy, claims handling and dispute resolution.

We may use or disclose your personal information for a secondary purpose where you have consented to such use. We may also use or disclose your personal information for a secondary purpose if you would reasonably expect us to use or disclose the information for that secondary purpose and that secondary purpose is related to the primary purpose of collection. In addition we may disclose personal information where required to or permitted by law.

We also collect your information so that we and our related companies and business alliance partners can offer you services and products that we believe may be of interest to you. You agree that we may so use your personal information. However, you can opt out of receiving such communications by contacting us.

4. Dealing with unsolicited personal information

If we receive personal information which we did not solicit, then within a reasonable period after receiving that personal information we will determine if we could have collected it. If we determine we could not have collected that personal information we will destroy or de-identify that personal information if it is lawful and reasonable to do so.

5. Disclosure to overseas recipients

If your personal information is collected by or supplied to an organisation outside of Australia we will ensure it will be held, used or disclosed only in accordance with the *Privacy Act 1988* (Cth).

6. Data quality and security

We will take such steps as are reasonable in the circumstances to ensure the personal information we collect is accurate, up to date, complete and protected from unauthorised access, misuse, modification, interference or loss.

Your information is stored only in secured premises and on protected electronic databases. The databases are password and access-level protected. Access to personal information is only provided to those staff requiring it to carry on one of our functions or activities.

7. Access and correction

You can seek access to your personal information by contacting us. You can require us to correct the personal information if it is inaccurate, incomplete or out of date. We will respond to any such request within a reasonable time. We will provide you with access within a reasonable time in the manner requested, unless we are entitled to refuse to provide access. If we decline to provide you with access we will provide you with the reasons for our refusal and how you may access our internal dispute resolution (IDR) process.

If we correct information we will inform you. If we refuse to amend information we will provide you with our reasons for the refusal and details of how to access our IDR process.

8. Identifiers

We will use our own identifiers and not those assigned by the government unless we are required to do so, or the APPs or another law permits us to do so.

9. Anonymity and pseudonymity

You have the option of not identifying yourself or using a pseudonym provided it is not impracticable for us to deal with you on this basis.

However, it will generally be impractical for you to deal with us anonymously or under a pseudonym, should you wish to enter into a contract of insurance with us. This is because your identity is a relevant factor in relation to the risk of insurance. It is material to our decision of whether or not to insure you and if so on what terms and premium.

10. Complaints

If you have a complaint regarding our management of your privacy you may access our internal dispute resolution (IDR) process by contacting us. Your complaint is reviewed by our Privacy Officer who has up to 15 business days to resolve your complaint. If the Privacy Officer cannot resolve your complaint then it will be escalated to a designated IDR Officer who will make a final IDR decision within 15 business days of the escalation. When we make our decision we will also inform you of your right to take this matter to the Office of the Australian Information Commissioner (OAIC) together with contact details and the time limit for applying to the OAIC. In addition if you have not received a response of any kind to your complaint within 30 days, then you have the right to take the matter to the OAIC.

The OAIC is the statutory body given the responsibility of complaint handling. The OAIC is independent and will be impartial when dealing with your complaint. The OAIC will investigate your complaint, and where necessary, make a determination about your complaint, provided it is covered by the Privacy Act 1988 (Cth). You have 12 months from the date you became aware of your privacy issue to lodge your complaint with the OAIC. The contact details of the OAIC are:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Telephone: 1300 363 992
Website: www.oaic.gov.au
Email: enquiries@oaic.gov.au

11. Further information

If you would like more details about our privacy policy, would like to seek access to or correct your personal information, or opt out of receiving materials we send, please email us at privacy@wfi.com.au, call us on 1300 934 934 or write to us at:

WFI Privacy Officer
Locked Bag 1
Bassendean DC WA 6942

You can also view a copy of our current privacy policy on our website at wfi.com.au.