



PRIVACY AND SPAM POLICY

At Safeguard Insurance Solutions Pty Ltd, we are committed to protecting your privacy in accordance with the Privacy Amendment (Private Sector) Act 2000. This Privacy and Spam 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?

When we arrange insurance on your behalf, we ask you for the information we need to advise you about your insurance needs and management of your risks. We collect any information that the insurers or intermediaries who we ask to quote for your insurances and premium funding 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 and in some circumstances we may need to obtain your consent before this occurs.

When you make a claim under your contract of insurance, 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, e.g. loss adjusters, medical advisers etc) to enable it to consider your claim. Again this information may be passed on to reinsurers.

Where reasonable and practical we will collect your personal information directly from you and from third parties once authorisation has been provided by you. You have a right to refuse us authorisation to collect information from a third party.

We also use your information 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 may do so by mail or electronically unless you tell us that you do not wish to receive electronic communications.

We may occasionally notify you 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 matters. If you would rather not receive this information, email or write to us. We maintain a register for those individuals not wanting direct marketing material.

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

What if you don't provide some information to us?

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

If you provide inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking.

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

Sensitive information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

This is subject to some exceptions including:

- the collection is required by law; and
- when the information is necessary for the establishment, exercise or defence of a legal claim.

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 any applicable legal or ethical reporting or document retention requirements

We hold the information we collect from you within our computer system. We ensure that your information is safe by restricting access to our computer system to staff only with all systems being password protected as well as our offices having appropriate security.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

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, eg 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.

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.

The Corporations Act 2001 has provided the Australian Securities and Investments Commission with the authority to inspect certain personal information that is kept on our files about you.

In the event of that we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them.

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.

If you wish to access or correct your personal information please write to our Privacy Officer, at the address stated below.

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 however we reserve the right to charge a fee should there be any resultant work that comes from accessing this information. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Some exceptions exist under the Privacy Act where we will not provide you with access to your personal information, including where:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;

- the request for access is frivolous or vexatious;
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

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.

Tell us what you think

We welcome your questions and comments about privacy and a copy of our Privacy and Spam Policy is available on request. If you have any concerns or complaints, please contact our Privacy Officer on the details below. Any complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Privacy Commissioner.

Contact Details

Privacy Officer:	Bryan Joy
Address:	Unit 10, Level 1, 152 Balcatta Road Balcatta WA 6021
Telephone :	9273 1353
Facsimile:	9273 1344
E-mail:	info@safeguardinsurance.com.au

Spam Act

Spam is a generic term used to describe electronic 'junk mail'- unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'.

'Electronic messaging' covers emails, instant messaging, SMS and other mobile phone messaging, but does not cover normal voice-to-voice communication by telephone.

We comply with the provisions of the Spam Act when sending commercial electronic messages. Equally importantly, we make sure that our practices are in accordance with the National Privacy Principles in all activities where they deal with personal information. Personal information includes our clients contact details.

Electronic and commercial messages will only be sent to you when you have given consent. Should you have a complaint about any relevant messages received from us, please contact the Privacy Officer on the details listed above.

This policy was last updated on 28 April 2010