

The SLE Group

PRIVACY POLICY

SLE'S Privacy Policy

This Privacy Policy explains how SLE manages, collects, uses and protects an individual's personal information in accordance with our obligations under the Privacy Act 1988 (Cth) ("Privacy Act").

On the 12 December 2012 the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* was given Royal assent. The new Act amends the Privacy Act 1988 to create a single set of 'Australian Privacy Principles' (APP) which replace the previous National Privacy Principles (NPPs) for the private sector. The changes implemented by the *Privacy Amendment* take effect in March 2014.

Essentially, the new APP's:

- Provide clear and strong controls around the use of personal information for direct marketing;
- Extend privacy protections to information gathered incidentally;
- Make it easier for consumers to access and correct information held about them;
- Tighten the rules on sending information outside Australia;
- Afford a higher standard of protection to "sensitive information" – which includes health related information, DNA and biometric data

To read a snapshot of our personal information handling practices, including the type of information we collect, how we collect and use it, and how to contact us for further information, please refer to our privacy statement which is available within our product documents and application forms and on our website at **Error! Hyperlink reference not valid.** or by contacting us.

To receive a copy of this Privacy Policy by email or post please contact our Privacy Officer team on +61 2 9249 4850 or email privacy@sleworldwide.com.au. To receive a copy of this Privacy Policy in some other form, please let us know and we will do our best to accommodate the request.

Definitions

In this Policy we use certain terms as they are defined in the Privacy Act, so when we say:

- **'personal information'** we mean "information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not"
- **'sensitive information'** we mean "information or an opinion about an individual's racial or ethnic origin; political opinion; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; sexual orientation or practices; criminal record; genetic information or health information or biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates
- a **'permitted general situation'** we mean preventing a serious threat to life, health or safety; taking action in respect of serious unlawful activity or misconduct; locating a missing person; establishing or defending a legal claim or engaging in a confidential alternative dispute resolution process.

Objectives

The objectives of this Privacy Policy are to:

- clearly communicate SLE's personal information handling and management practices and demonstrate how those practices are in accordance with the Australian Privacy Principles (APP's) and the Privacy Act;

- demonstrate our on-going commitment to the protection of privacy and address any privacy concerns that an individual might have, including identifying how an individual may obtain access to, or request correction to their personal information that we hold, and to clearly identify our practices and processes in the event of a privacy complaint;
- give individuals a better and more complete understanding of the sort of personal information that we collect and hold, and the purposes for which we use that information, including when or whether we are likely to disclose their information to overseas recipients.

Practices and procedures to support this Privacy Policy

SLE has implemented this Privacy Policy by developing and implementing procedures and staff training to ensure compliance with this Privacy Policy including the appropriate handling of enquiries or complaints about privacy. We ensure that all our employees and any representatives who deal with personal information are aware of the standards of this Privacy Policy.

SLE requires that all of its staff and representatives with access to personal information maintain the confidentiality and security of personal information and we support this requirement by using appropriate contractual terms and internal policies.

Our procedures for handling personal information implement the standards of this Privacy Policy. SLE trains its employees in the proper conduct of those procedures that are relevant to their duties. Please also refer to the sections of this Privacy Policy headed 'Access to Personal Information We Hold / Seeking Correction of Personal Information' and 'Our Privacy Complaints Process' and to the 'Personal Information Request Form' (available on our website at www.SLEgroup.com/au or by contacting us) for further details of the procedures we have in place to administer this Privacy Policy.

How we collect and hold personal information

Collection

SLE will generally collect an individual's personal information only from that person except when it is unreasonable or impracticable for us to do so. SLE collects personal information which may include sensitive (including health) information when an individual is applying for, changing or renewing an insurance policy with us or when we are processing a claim.

SLE will only collect an individual's personal information by lawful and fair means. Sometimes we collect personal information from a third party (which may include a person or entity with whom we have a distribution partnership or other business relationship) or from a publicly available source. However, we do this only if the individual has consented to such collection or would reasonably expect us to collect their personal information in this way e.g. from an employer under a group policy or if it is necessary for a specific purpose such as the investigation of a claim.

In limited circumstances, we may receive personal information about third parties from individuals who contact us and supply us with the personal information of others in the documents they provide to us. Where an individual may not be aware that SLE has collected their personal information we will take reasonable steps to ensure such awareness, including the circumstances of the collection and how we handle that personal information.

Personal information may be provided to us via a third party with an existing connection to an individual, such as an insurance intermediary or employer (e.g. in the case of a group insurance policy). Where information is provided to us via a third party, we collect that information on the basis that an individual has consented to such collection, or would reasonably expect us to collect the personal information in this way. We then take reasonable steps to ensure the individual is aware of how we handle their personal information.

We also collect personal information related to employment services, human resource management and other corporate service functions.

SLE will only collect an individual's sensitive information with that individual's consent, and when:

- it is reasonably necessary for one or more of our functions or activities; or
- the collection is required or authorised by law; or
- a permitted general situation exists.

Notification on collection

At or before the time SLE collects an individual's personal information (or, if that is not practicable, as soon as practicable afterwards), SLE will undertake reasonable steps to make such individual aware of the following matters:

- SLE's identity and how to contact us;

- the fact that the collection of information is required by law (if applicable);
- the purpose for the collection of the personal information;
- the main consequences (if any) if all, or some of the personal information is not collected;
- that SLE may disclose the personal information to third party service providers to carry out certain business activities on its behalf (such as claim assessors or call centres);
- how an individual may access the personal information and seek its correction;
- how an individual may raise a privacy concern or complaint to us; and how we will deal with it;
- whether disclosure of the personal information to overseas recipients is likely.

Personnel records

We generally collect personal information directly from employees and prospective employees but may also collect personal information from intermediaries such as recruitment agents and personnel providers relevant to the selection process. The purpose of personnel records is to maintain current employee information for business and employment related purposes, or where authorised or required by law. The information may include application(s) for employment and referee reports. Employees of SLE should review SLE's Human Resources Policies available via the intranet for further information.

Collection via online portals

We do not collect any identifiable personal information about individuals who visit our website or our online portals unless that individual chooses to provide it to us voluntarily. With the exception of online claims lodgement, the information collected via our on-line portals is generally very limited and is only used to identify generic behavioural patterns.

Sometimes we use third party platforms to deliver information. These are sites hosted and managed by organisations other than ourselves. In certain instances SLE may provide links to other internet sites, not operated by SLE, in order to engage with the public to share content or provide access to additional useful information and services. Where that occurs it is important for an individual to be aware that every third party site or tool will have separate privacy and data collection practices, independent of SLE. Before deciding to contribute to any third party site, an individual should consult the privacy policies relevant to the host of that site or tool to understand how the third-party site or tool will treat information relating to them.

Anonymity and pseudonymity

SLE will provide an individual with the option of not having to identify himself/herself or will allow use of a pseudonym when dealing with us unless it is impractical for us to do so.

Data quality

SLE will take reasonable steps to ensure that the personal information it collects, is accurate, up to date and complete including by maintaining and updating personal information when we learn from individuals that their personal information has changed, and at other times as necessary.

SLE will take reasonable steps having regard to the purpose of the use or disclosure, that your personal information is accurate, up-to-date, complete and relevant.

If you are on one of our automated email lists, you may opt out of further contact from us by clicking the 'unsubscribe' link at the bottom of the email.

Data security

SLE will take such steps as are reasonable in the circumstances to protect the security of personal information from:

- misuse, interference or loss; and
- unauthorised access, modification or disclosure.

These steps include password protection for accessing our electronic IT systems, securing paper files in locked cabinets and physical access restrictions. When no longer required, personal information is destroyed in a secure manner, or deleted in accordance with our standard document destruction procedures.

In relation to our own servers, we take all reasonable steps to manage data stored on our servers to ensure data security.

SLE will take such steps as are reasonable in the circumstances to destroy or de-identify personal information when it is no longer needed or required to be retained by law or Court/tribunal order.

In the event of an eligible data breach, SLE will notify relevant individuals and the Office of the Australian Information Commissioner pursuant to our obligations under Part III C of the Privacy Act.

The types of personal information that we collect and hold

The kinds of personal information we usually collect depends on the type of product and or service sought, such as:

- an individual's name and address, their age, phone number, details of employment or position, period of employment, remuneration, hours worked, duties performed, insurance held, income and expenditure, family status and beneficiaries etc.;
- information about an individual's transactions with us or with our affiliates, or with others, such as policy coverage and premium payment history, claims processed etc.

Where we receive unsolicited personal information we will determine, within a reasonable period, whether the information could have been validly collected if we had solicited it. If we determine that we could not have collected the personal information, (and the information is not contained in a Commonwealth record) we will destroy or de-identify the information as soon as it is practicable, but only if it is lawful and reasonable to do so.

When an individual visits our online resources, our metric tools (for example, cookies*) may collect the following information about the visit for the following reasons:

- to maintain continuity during a user session;
- to gather data about the usage of our web site for research and other purposes; or
- to enable our servers to recognise the computer so that an individual's preferences and/or authentication credentials can be recognised, so that that individual does not have to provide this information every time he or she returns to our web site.

For additional information please refer to our Terms of Use (available on our website). Individuals have the option to block all cookies, including cookies associated with our services, via his/her browser. However, it is important to remember that services provided via our online platforms may not function properly where cookies are disabled.

* Cookies are a standard for storing small pieces of data in a web browser

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

SLE will only collect personal information that is reasonably necessary for its usual business functions or activities.

We only use personal information for the purposes for which it was given to us, or for purposes which are directly related to one of our functions or activities. We do not provide an individual's personal information to third parties such as government agencies, organisations or anyone else unless one of the following applies:

- the individual has consented;
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies;
- it is otherwise required or authorised by law;
- it will prevent or lessen a serious and imminent threat to somebody's life or health;
- it is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.

In some circumstances, we may need to transfer an individual's personal information to overseas recipients, such as other SLE Group entities (located in our head offices in Singapore, UK or USA) or other third parties with whom we, or other SLE Group entities, have sub-contracted to provide specific services for us. These may be outside of Australia. In particular, a dedicated regional servicing unit located in the Philippines performs certain business processing functions for SLE.

In all instances where personal information may be disclosed to third parties who may be located overseas, in addition to any local data privacy laws to which those entities are subject, we have measures in place to ensure that those parties hold and use such information in accordance with the consent provided by the individual and in accordance with our obligations under the Privacy Act.

SLE will not use or disclose an individual's personal information that was collected for a particular purpose (the primary purpose) for another purpose (a secondary purpose) unless:

- the individual has provided consent to the use or disclosure of the information; or
- the individual would reasonably expect the information to be used for the secondary purpose and the purpose is related to the primary purpose of collection (directly related in the case of sensitive information);
- use or disclosure is required or authorised by law;
- a permitted general situation exists;
- SLE reasonably believes that the use or disclosure is reasonably necessary for enforcement related activities conducted on behalf of, an enforcement body. (In this case SLE will make a written note of the use or disclosure);

SLE may use or disclose an individual's personal information (other than sensitive information) for direct marketing purposes if:

- the information has been collected from the individual; and
- the individual would reasonably expect that the personal information would be used or disclosed for that purpose; and
- the individual has been provided with a simple means by which one can easily request not to receive direct marketing communications; and
- the individual has not made such a request.

Where SLE has collected an individual's personal information from a third party, that personal information may be used or disclosed for direct marketing if:

- the individual has consented to its use or disclosure, or if it was impracticable to obtain their consent;
- the individual was provided with a simple means by which he/she could have easily requested not to receive direct marketing communications; or was otherwise made aware that they could make such a request; and
- the individual did not make such a request.

If an individual requests confirmation of the source of their personal information used by us for direct marketing purposes, we will endeavour to provide it to them within a reasonable period, unless it is impracticable or unreasonable for us to do so.

SLE will not use or disclose an individual's sensitive information for direct marketing purposes without that individual's consent.

Before SLE discloses an individual's personal information to a third party who is an overseas recipient, SLE will take such steps as are reasonable to ensure that the third party does not breach the APPs. SLE will contractually ensure that an individual's personal information is held and used in accordance with the consent provided and in accordance with our obligations to the individual under the Privacy Act except where:

- SLE reasonably believes that the overseas recipient is subject to a law that protects the information in a way that is substantively similar to the APPs, and the individual is able to access mechanisms to enforce such a law; or
- where SLE informs an individual that consent to disclose will mean that the obligation does not apply and that individual provides their consent to disclosure on that basis, or
- where the disclosure is required or authorised by law, or
- a permitted general situation exists.

Government related identifiers

A government related identifier is an identifier that has been assigned by an agency, a State or Territory authority, an agent of an agency or authority, or a contracted service provider for a Commonwealth or State contract (such as an individual's Medicare, Centrelink, driver licence or passport number).

SLE will not adopt for its own use a government related identifier allocated to an individual. In addition, SLE will not use or disclose a government related identifier that has been allocated to an individual unless:

- it is reasonably necessary to verify an individual's identity for one or more of our functions or activities; or
- the use or disclosure of the identifier is reasonably necessary for SLE to fulfil its obligations to an agency or a State or Territory Authority; or
- the use or disclosure of the identifier is required or authorised by, or under, an Australian law or a court/tribunal order;

or

- a permitted general situation exists; or
- SLE believes that the use or disclosure of the identifier is reasonably necessary for one or more enforcement related activities by, or on behalf of, an enforcement body.

Access to personal information we hold / seeking correction of personal information

Where SLE holds personal information about an individual, SLE will provide that person with access to the information on request unless:

- SLE reasonably believes doing so would pose a serious threat to the life, health or safety of a person; or
- it would have an impact on the privacy of other individuals; or
- the request is frivolous or vexatious; or
- the information relates to existing or anticipated litigation between SLE and the individual and the information would not be accessible through the discovery process; or
- it would reveal and prejudice SLE's intention in respect of negotiations with the individual; or
- it is unlawful or as required by law; or
- denying access is required or authorised by, or under, an Australian law or a court/tribunal order;
- SLE has reason to suspect that unlawful activity or serious misconduct relating to its functions or activities has been, is currently or may subsequently be engaged in and giving access to the information would likely prejudice the taking of appropriate action; or
- it would likely prejudice enforcement related activities; or
- it relates to SLE's commercially sensitive decision-making process.

An individual who seeks access to that person's personal information we hold should contact us by using and following the instructions on the 'Personal Information Request Form' (available on our website at www.SLEgroup.com/au or by contacting us). SLE will respond to an individual's request for access to his/her personal information within a reasonable period after receipt of the request.

SLE will provide an individual with access to the information in the manner the individual requests, if it is reasonable and practicable to do so.

SLE will not usually charge the individual for a request to access to the individual's information. However, if it decides to apply a charge for providing the information, this will be limited to SLE's reasonable costs only.

Where SLE decides to refuse an individual access to their personal information (including as to the manner requested) it will provide written reasons together with guidance on how the affected individual can make a complaint.

Correction of personal information

Where SLE holds personal information about an individual, and it is satisfied that the information held is inaccurate, out of date, incomplete, irrelevant or misleading; or an individual makes a request that it be corrected, SLE will take reasonable steps to correct it, having regard for the purpose for which it is held. An individual who seeks correction of any personal information we hold about him/her should contact us.

Where SLE previously disclosed an individual's personal information to a third party and that individual requests us to notify the other party of the correction, SLE will take reasonable steps to provide the notification, unless it is impracticable or unlawful for us to do so.

Where SLE does not agree to make the requested changes to the personal information held, an individual may make a statement providing details of the bases for which it is asserted that the information held is inaccurate, out of date, incomplete, irrelevant or misleading. SLE will link any such statement of correction received to the record so that the correction statement is apparent to the users of the personal information.

SLE will respond to an individual's (or their agent's) request within a reasonable period, and will not impose a charge for correcting the personal information, or for adding an individual's statement of correction to the personal information held.

Privacy complaints process

Where an individual has any concerns about our treatment of their personal information or where the individual believes there has been a breach of this Privacy Policy, they should contact SLE's Privacy Officer clearly setting out the nature of their concern. An individual who seeks to raise a privacy concern or complaint should contact us.

Complaints can be oral or written. However, for oral complaints we ask the individual to confirm the complaint in writing as soon as possible. If an individual requires assistance in lodging a concern or complaint, they should contact us.

In the event of a privacy complaint, it will be reviewed and considered by someone in SLE with the appropriate authority to deal with the complaint and SLE will provide the complainant with a written response. If it cannot be resolved, the complaint will be referred to SLE's Internal Disputes Resolution Service and the complainant will receive a response in writing within fifteen (15) working days, setting out the general reasons for the outcome and information on the further action that the individual can take, should he/she remain dissatisfied with our handling of the complaint.

Further Review of any Privacy Complaint

If an individual remains dissatisfied with SLE's review, he/she may take the complaint to the Australian Financial Complaints Authority (AFCA) or to the Office of the Australian Information Commissioner (OAIC). The Information Commissioner has the power to investigate complaints and recommend appropriate action to remedy privacy complaints and can be contacted on 1300 363 992, or by writing to the Information Commissioner, GPO Box 5218, Sydney NSW 2001.

Updating this policy

Our Privacy Policy may change from time to time and where this occurs, the updated Privacy Policy will be posted to our home web-pages (SLEgroup.com/au and www.combined.com.au). If the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

Contact details

For further information about SLE & Privacy or to access our complaint handling and dispute procedure, please address your correspondence to:

The Privacy Officer
SLE Worldwide
Australia Pty Limited /
Pacific Underwriting
Corporations Pty Ltd
GPO Box H308
Australia Square NSW 1215
Telephone: +61 2 9249 4850
Email:
Privacy@sleworldwide.com.au