



PRIVACY POLICY

About the Verve Insurance Pty Ltd Privacy Policy (and referred to as Verve Insurance in this Privacy Policy) respects your privacy and is committed to protecting the personal information of its clients.

Verve Insurance is covered by the Privacy Act 1988 (Cth) and its Australian Privacy Principles ("APPs") which set out standards for the collection, use, disclosure and handling of personal information.

Personal information is essentially any information or opinion that can identify a person (e.g. a name and address). Personal information that is collected by Verve Insurance generally includes an individual's full name, address, contact number(s), email address and date of birth.

How and why Verve Insurance collects your personal information?

Verve Insurance collects personal information directly from you or from third parties in respect of you. For example, Verve Insurance may also obtain personal information in respect of you from past insurers, witnesses to claims, and publicly available sources.

Verve Insurance collects personal information during the course of its relationship with you. Collection of information may take place in a number of ways, such as when you complete an application form for a new product or service or at renewal, request a product or service over the internet, telephone or email, or contact Verve Insurance to lodge a claim.

Verve Insurance collects personal information in order to provide its insurance services. Verve Insurance may also use your personal information to:

- Help determine insurance requirements and provide appropriate products and services
- Develop and identify products and services that may be of interest to clients
- Conduct customer satisfaction surveys
- Establish and administer alliances and other arrangements with other organisations in relation to the promotion, administration and use of Verve Insurance's respective products and services.

For more information regarding Verve Insurance's services please contact your Verve Insurance Account Manager on (02) 6162 0681.

How Verve Insurance uses and discloses personal information?

Verve Insurance does not use or disclose personal information for any purpose that is unrelated to its services and that you would not reasonably expect (except with your consent).



We rely on you to ensure that the personal information we collect from you is accurate, complete and up to date. Verve Insurance may contact you to confirm or update the details of your personal information however you can contact Verve Insurance at any time to update your personal information.

Verve Insurance has a duty to maintain the confidentiality of its clients' affairs which includes their personal information. Verve Insurance's duty of confidentiality applies except where disclosure of your personal information is with your consent or required by law.

Verve Insurance discloses personal information to third parties who are involved in the provision of its services. For example, in arranging and managing your insurance needs Verve Insurance may provide information to insurers, reinsurers, other insurance intermediaries, its advisors such as loss adjustors, lawyers and accountants, and other parties involved in the claims handling process. Generally, Verve Insurance will not disclose your information to overseas companies. However, occasionally Verve Insurance may need to do so, for example, if the insurance advice or coverage you require is in a specialised field requiring an expertise or market not readily available within Australia. We will generally discuss this with you before we forward your information overseas. Verve Insurance may disclose your personal information to mail service providers for the mailing of statements or insurance policy documentation. Verve Insurance may also provide it to purchasers of its business and related Verve Insurance companies.

Verve Insurance may use or disclose personal information in order to inform you of products and services that may be of interest to you. You may opt out of receiving such communications at any time using the opt-out mechanism available on such communications, or by contacting Verve Insurance's Privacy Officer. Verve Insurance will not use or disclose sensitive information for the purpose of direct marketing unless the individual has consented to being contacted for such purpose.

Verve Insurance takes reasonable steps to ensure that the personal information it collects from you is accurate, complete and up-to-date whenever Verve Insurance collects, uses or discloses it. If the personal information Verve Insurance requests from you is not provided, Verve Insurance or any involved third party may not be able to provide the appropriate services.

What Verve Insurance expects of you and third parties it deals with?

When you provide Verve Insurance with personal information about other individuals, Verve Insurance relies on you to have made them aware that you will or may provide their information to Verve Insurance, the purposes Verve Insurance uses it for, the types of third parties Verve Insurance discloses it to, and how they can access it (as described in this policy). If it is sensitive information Verve Insurance relies on you to have obtained their consent to the above.

If you have not done either of these things you must notify Verve Insurance before you provide the relevant information.

If Verve Insurance provides you with personal information, you and your representatives must only use it for the purposes Verve Insurance agrees to. Where relevant you must meet the requirements of the APPs set out in the Privacy Act when collecting, using, disclosing and handling personal information on Verve Insurance's behalf. This obligation extends to your agents, employees and contractors.

In some cases we will require you to specifically consent to the collection, use or disclosure of your personal information by Verve Insurance. Your consent will usually be required in writing and in some cases your consent may be implied through your conduct such as when you continue a telephone call after you have been advised that the personal information will be collected, used or disclosed.

Security of your personal information

Verve Insurance takes all reasonable steps to protect any personal information that it holds from misuse and loss, and protect it from unauthorised access, modification and disclosure. For example, Verve Insurance maintains physical security over its manual and electronic records and premises, such as locks, and monitored security systems. Verve Insurance also maintains computer and network security, including firewalls to prevent unauthorised internet access to records, user passwords to control access to computer systems.

Sensitive information

Sensitive information is defined as including information about someone's political opinion/s or membership, professional or trade memberships, sexual preferences, criminal record, state of health, religion, racial or ethnic origin. Verve Insurance will only collect, use or disclose sensitive information which is necessary for the purpose of administering insurance products and claims, with the consent of the person to whom it relates or as required by law.

Direct Marketing

Verve Insurance may make use of your personal information to provide you with information about its products and services. If you do not want to receive any of this information or you do not want to disclose your information to any other organisation including related bodies corporate simply contact the Verve Insurance Privacy Officer as outlined below and you will not receive any further information. If you change your mind and want to receive information about Verve Insurance products and services at a later date, simply let us know.

By law, Verve Insurance is sometimes required to provide you with information related to the products and services you receive from us. You will continue to receive information about these products and services, even if you have chosen not to receive general information about other products and services.

Verve Insurance does not disclose your personal information to any other party outside of our company, solely for the purpose of direct marketing their products and services to you.



Accessing your personal information

You are entitled to request access to the information Verve Insurance holds about you.

If you have reason to believe that the personal information Verve Insurance holds is inaccurate, incomplete, or out-of-date, you are entitled to request that the information be amended.

Verve Insurance is not always required to provide you with access to your personal information however if your request is denied an explanation will be provided to you.

Verve Insurance may be required by law to retain your personal information for a specified period of time after you have ended your relationship with us. After the expiry of this required time, all reasonable steps will be taken to ensure the secure destruction of your personal information.

To make an enquiry or lodge a change request regarding your personal information, please contact the Verve Insurance Privacy Officer during business hours at:

Verve Insurance Pty Ltd

17–23 Townshend Street, Phillip, ACT 2606. Tel (02) 6162 0681

Email: privacy@verveinsurance.com.au

Website: verveinsurance.com.au

There is generally no fee for requesting access to your personal information. In some cases however, a fee may be charged to recover costs where the information has to be retrieved from archives.

Lodging a complaint regarding a breach of the Australian Privacy Principles

If you believe that Verve Insurance has breached an aspect of the APPs, you should in the first instance contact the Verve Insurance Privacy Officer (see above) with the details of your complaint.

Your complaint will be taken and investigated by the Privacy Officer. If a breach is identified all efforts to rectify it and put in place additional safeguards to ensure it cannot recur will be taken. If the problem is one of accuracy, you will be invited to review your information and it will be amended as necessary to meet our obligations to you and to third parties who have been involved with your account.

If you are not satisfied with the outcome of Verve Insurance's internal investigation you should contact the Office of the Australian Information Commissioner (OAIC) to lodge a complaint.



You should note that:

- It is free to lodge a complaint with OAIC.
- You do not need a lawyer. However if you do decide to hire a lawyer, you must pay for the lawyer yourself.
- OAIC investigates privacy complaints from individuals about Australian, ACT and Norfolk Island government agencies, and private sector organisations covered by the Privacy Act.
- OAIC aims to resolve complaints as quickly as possible. Some complaints are resolved within weeks, but more complex complaints may take longer.
- Complaints are generally resolved through conciliation.
- You can choose to withdraw your complaint at any time.

Full details regarding lodging a complaint can be found at www.oaic.gov.au/privacy/privacy-complaints

This Privacy Policy applies from 25th June, 2018 and remains valid unless a further Privacy Policy is issued to replace it.

Verve Insurance Pty Ltd [ABN 95 625 643 889] authorised representative of Strata Solutions International Pty Ltd trading as Strata Insurance [ABN 58 080 071 307] [Australian Financial Services Licence No 234722].

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