

BLUE BADGE INSURANCE PTY LTD

BLUE BADGE INDEPENDENT LIVING AUSTRALIA PTY LTD

BLUE BADGE COMMUNITY AUSTRALIA PTY LTD

PRIVACY POLICY

1 October 2017 V2-0

Privacy is important especially when you consider the various ways that we can communicate and interact today.

Blue Badge Insurance Australia Pty Ltd, Blue Badge Independent Living Pty Ltd and Blue Badge Community Australia Pty Ltd are committed to handling your personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

This Privacy Policy applies to personal information that we collect from you. It also applies to personal information that we collect about you from third parties.

WHO DOES THIS PRIVACY POLICY APPLY TO

Blue Badge Insurance Australia Pty Ltd (**BBIA**), Blue Badge Independent Living Pty Ltd (BBIL) and Blue Badge Community Australia Pty Ltd (**BBCA**) are associated and both provide a range of products and services. These entities will be referred to in this Privacy Policy as “we”, “us” or “our”.

WHY DO WE COLLECT PERSONAL INFORMATION?

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable. We collect personal information so that we can:

- identify you and conduct appropriate checks;
- understand your requirements and provide you with a product or service, access to the BBCA Membership (if selected), updates, newsletters, invitations to participate in surveys made either via our website or emails;
- set up, administer and manage our products, services and systems, including the management and administration of underwriting and claims;
- assess and investigate any claims you make under one or more of our products;
- manage, train and develop our employees and representatives;
- manage complaints and disputes, and report to underwriters and dispute resolution bodies; and
- get a better understanding of you, your needs, your behaviours and how you interact with us, so we can engage in product and service research, development and business strategy including managing the delivery of our services and products via the ways we communicate with you.

WHAT HAPPENS IF YOU DO NOT PROVIDE YOUR PERSONAL INFORMATION?

If we ask for your personal information and you don't give it to us, we may not be able to:

- Provide you with any, some, or all of the benefits of our products and services.
- Offer BBICA Membership, BBIA products, manage existing BBIL products
- Determine the amount of any premiums and associated fees, or to assess claims;
- Manage and administer our relationship with you;
- Let you know about other products or services or benefits that may be of interest to you; and
- Verify your identity and protect against fraud.

HOW WE HANDLE YOUR PERSONAL INFORMATION

Collecting & Disclosing Personal Information

We collect your personal information directly from you and, in some cases, from other people or organisations. We also provide your personal information to our associated entities and they may disclose or use your personal information for the purposes described in 'Why do we collect personal information?' in relation to products and services they may provide to you. They may also use your personal information to help them provide products and services to other customers, but they'll never disclose your personal information to another customer without your consent.

We will use and disclose your personal information for the purposes we collected it as well as purposes that are related, where you would reasonably expect us to.

We may disclose your personal information to and/or collect your personal information from:

- our related companies;
- customer, product, business or strategic research and development organisations;
- any organisation that provides us with information in connection with financial services;
- social media and other virtual communities and networks where people create, share or exchange information;
- associations, member loyalty programs, competition promoters and industry organisations;
- a third party that we've contracted to provide financial services, financial products or administrative services – for example:
 - information technology providers;
 - claims management service providers
 - equipment manufacturers, dealers and or suppliers, parts and accessory providers;
 - marketing agencies and other marketing service providers; and
 - print/ mail/ digital service providers; and
 - imaging and document management services.

- a third party claimant or witness in a claim;
- in the case of a relationship with an Interested Party such as bank, credit union or finance lender;
- government, statutory or regulatory and enforcement bodies;
- policy or product holders or others who are authorised or noted on the policy as having a legal interest, including where you are an insured person but not the policy or product holder;
- the Financial Ombudsman Service or any other external dispute resolution body;
- your insurer, other insurers, insurance investigators and claims or insurance reference services, loss assessors and any new incoming insurer;
- legal, accounting, auditors and any other professional advisors or consultants;
- hospitals and medical, health or wellbeing professionals;
- debt collection agencies; and
- any other organisation or person, where you've asked them to provide your personal information to us or asked us to obtain personal information from them.

We'll use a variety of methods to collect your personal information including sign up and profile creation forms, and we will disclose your personal information to these persons and organisations via electronic or written delivery. We may collect and disclose your personal information to these persons and organisations during the information life cycle, regularly, or on an ad hoc basis, depending on the purpose of collection.

Collecting Information Through Our Websites

When you visit our website (www.bluebadgeinsurance.com.au) we may use a "cookie" which is a small data file that is placed on the computer of a website user (usually in the browser software folder). Cookies are generally used only to facilitate your access to secure areas of our websites. We may also derive general information from cookies such as statistics relating to the number of visitors to our websites or how our websites are used.

You can set your internet browser to refuse cookies however this may mean that you are not able to take full advantage of the services and information offered through our websites.

We will handle any personal information that is collected through the use of our websites in accordance with this Privacy Policy.

We cannot guarantee that information sent over the internet is secure.

Collecting Sensitive Information

Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information.

We will not collect, use or disclosure sensitive information about you unless:

- We are legally required to do so; or
- We need that information for one of our functions or activities and we have your consent.

Unsolicited Information

Sometimes we may receive unsolicited personal information about you. If so, we will check whether or not that the information is reasonably necessary for our functions or activities and we could have collected it from you if we had solicited the information. If it is, we'll handle this information the same way we do with other information we seek from you. If not, and it is lawful and reasonable to do so, we'll ensure we do the right thing and destroy or de-identify it.

Collecting Information from Prospective Employees

As part of the employment screening process we generally collect the following personal information about prospective employees in order to process and evaluate applications for employment:

- Name and residential address;
- Police security clearance;
- Employment reference reviews; and
- Employment history.

Information from unsuccessful applicants may be kept for up to six months to allow those candidates to be considered for appropriate future opportunities.

Overseas Disclosure

For all insurance applications with Lloyd's of London UK, we need to provide your personal information to or get personal information about you from persons or organisations like the Lloyd's broker and underwriters at Lloyd's of London located overseas, for the same purposes as in 'Why do we collect personal information?'

We implement reasonable measures to ensure that an overseas recipient of your personal information does not breach the privacy laws in Australia.

Your Certificate of Insurance will identify the insurer's details and location.

YOUR CONSENT & OUR MARKETING PRACTICES

By providing us with your personal information you consent to its collection and use for these purposes.

Every now and then, we and any related companies that use the Blue Badge brand might let you know – via mail, SMS, email, telephone or online – about news, special offers, products and services that you might be interested in. We will engage in marketing unless you tell us otherwise. You can unsubscribe or contact us to change your marketing preferences at any time.

In order to carry out our direct marketing we collect your personal information from and disclose it to others that provide us with specialised data matching, trending or analytical services, as well as general marketing services (you can see the full list of persons and organisations under 'How we handle your personal information'). We may also collect your personal information for marketing through competitions and by purchasing contact lists.

We, and other people who provide us with services, may combine the personal information collected from you or others, with the information we, or our related companies, or our service providers already hold about you. We may also use online targeted marketing, data and audience matching and market segmentation to improve advertising relevance to you.

MANAGING YOUR PERSONAL INFORMATION

How Do We Store Your Personal Information

We store information in different ways, mainly in electronic form but from time to time in paper form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Some of the ways we manage the security of your personal information includes:

- Limiting access to the business premises;
- Confidentiality requirements placed on our employees;
- Record management processes;
- Security measures embedded within our various systems and IT applications;
- Limiting access to personal information to those employees who reasonably requires access to it in order to perform their duties; and
- Electronic security systems, such as firewalls and data encryption on our websites.

Where we store personal information electronically with third party data storage providers we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

How We Manage Your Personal Information if We No Longer Need It

We'll only keep your information for as long as we require it for the purposes that it was collected for. We are required to keep some of your information for certain periods of time under law.

When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

HOW YOU CAN ACCESS & CORRECT YOUR PERSONAL INFORMATION

You have the right to access and correct your personal information held by us and you can find information about how to do this in the Blue Badge Insurance Privacy Statement Contact Us section.

How Can You Correct Your Personal Information

We will endeavour to ensure that your personal information that we collect, use or disclose is accurate, complete, up-to-date and relevant for the purposes for which it was collected.

If you believe that the personal information that we hold about you or that has been released to others is:

- inaccurate,
- out of date,
- incomplete,
- irrelevant or
- misleading

then contact our Privacy Officer to inform us about the correction and we will endeavour to rectify the matter. If we cannot assist you with your concerns regarding your personal information we will let you know in writing.

Contact details for the Privacy Officer are contained in the "Contact Us" section.

Timeframes for Correcting Information

If we agree to correct your information, we'll do so within 30 days from when you asked us, or a longer period that has been agreed by you.

If we can't make corrections within a 30 day time frame or the agreed time frame, we will:

- let you know about the delay, the reasons for it and when we expect to resolve the matter;
- ask you to agree in writing to give us more time; and
- let you know you can complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

RESOLVING YOUR PRIVACY ISSUES

How do you make a complaint?

If you have concerns as to whether there has been a breach of privacy or you do not agree with a decision we have made about your access to or correction of personal information, you can make a complaint to our Privacy Officer. We will manage complaint by following our internal complaint resolution process.

Need More help?

If you are not happy with the way we have handled your complaint you may refer the matter to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

The Financial Ombudsman Service Ltd

Telephone: 1300 78 08 08

Facsimile: (03) 9613 6399

Email: info@fos.org.au

The Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au/privacy

Mail: GPO Box 5218, Sydney, NSW, 2001

GPO Box 2999, Canberra, ACT, 2601

Contact Us

Please contact our Privacy Officer if you wish to:

- Access or correct your personal information,
- To make a privacy related complaint;
- You have any questions or comments about our Privacy Policy; or
- The way that we handle your personal information.

You contact us by:

- Writing to us at: Privacy Officer, PO Box 550 Kotara, 2289
- Sending an email to: privacy@bluebadge.com.au
- Calling us on: 1300 304 802

ANONYMOUS / PSEUDONYM

If you have general enquiry type questions, you can choose to do this anonymously or use a pseudonym. However generally, we won't be able to deal with you anonymously or where you are using a pseudonym when:

- it is impracticable; or
- we are required or authorised by law or a court/tribunal order to deal with you personally.

We may offer anonymity in respect of surveys and questionnaires.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may change at any time. We will let you know of any changes to this Privacy Policy by posting a notification on our website. We encourage you to review our Privacy Policy on our website from time-to-time to ensure that you are aware of any changes. Any changes to our Privacy Policy will be effective on the date that they are published on the Blue Badge websites.