

Privacy Policy

This Privacy Policy applies to personal information collected by iMedia Pty Ltd T/As Eezy Insure ABN 69 627 876 975. It is intended to provide you with a detailed description of how we collect and handle your personal information.

Date of issue: 29th April 2014

1. Key facts about the Eezy Insure Privacy Policy

At Eezy Insure we understand that the privacy of your information is important to you and we respect the confidentiality of the information that you provide to us.

This document provides details about how we manage the personal information that we hold about individuals. This policy is technology neutral and applies to all forms of documentation and communications.

Eezy Insure's privacy policy is based on transparency and openness, in accordance with relevant privacy laws.

Eezy Insure's policy is available, free of charge, to anyone who asks for it, whether or not they are a customer.

Whenever we ask for personal information about you we normally outline why that information is being collected and how we use and disclose it when providing our products and services to you.

Eezy Insure is obligated to act in accordance with all relevant privacy legislation. As at the date of this document current privacy laws comprise of the

Privacy Act 1988 (Cth) as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) which includes the thirteen Australian

Privacy Principles (APPs) and any Registered APP Code:

The APPs set out how organisations must handle information during the entire life cycle of collection, use and disclosure. They are set out below:

Australian Privacy Principle 1 — open and transparent management of personal information

Australian Privacy Principle 2 — anonymity and pseudonymity

Australian Privacy Principle 3 — collection of solicited personal information

Australian Privacy Principle 4 — dealing with unsolicited personal information

Australian Privacy Principle 5 — notification of the collection of personal information

Australian Privacy Principle 6 — use or disclosure of personal information

Australian Privacy Principle 7 — direct marketing

Australian Privacy Principle 8 — cross-border disclosure of personal information

Australian Privacy Principle 9 — adoption, use or disclosure of government related identifiers

Australian Privacy Principle 10 — quality of personal information

Australian Privacy Principle 11 — security of personal information

Australian Privacy Principle 12 — access to personal information

Australian Privacy Principle 13 — correction of personal information

2. How and why does Eezy Insure collect and use personal information?

It is important that you understand why Eezy Insure has to collect and use your personal information so we've set out our reasons below:

- To provide you with information about financial products or services we provide;
- To assess and underwrite an application for insurance or another product or service we provide;
- To provide you with the product or service that you have requested from us;
- To communicate to you about the products or services that you have with us; and
- To assist with claims on policies of insurance that you have through the Eezy Insure service;
- To comply with our legal obligations;
- To establish and administer our customer relationships;
- To monitor and evaluate products and services; less they tell us otherwise, to provide information on products and services offered by Eezy Insure, and external product and service providers with whom we have a business arrangement. If you have provided us with your email or mobile phone details, we or the provider may provide information to you electronically with respect to those products and services; To gather and aggregate information for statistical, prudential, actuarial and research purposes; and To take measures to detect and prevent fraud.

In most instances, we collect your personal information from you when you fill out an application form or personal statement, but we may also collect information from you which you provide to us over the telephone, fax, email, internet or by using other electronic devices. We need to collect information about you so that we can provide our products and services to you and these include, but are not limited to the following:

- Life insurance products

When we have collected your personal information, we use it to provide you with a product appropriate to your needs. For example, your health information is used to assess the risk in providing you with a product, and the pricing of that product. Your financial information is used to determine the insurance cover appropriate to you and your circumstances and the extent to which Eezy Insure can assist. If it is not required we will not collect your sensitive information.

3. Types of information – Personal and Sensitive

Personal information

Eezy Insure collects personal information to provide you with our products and services as well as information on other products and services offered by or through us. The law also requires us to collect personal information in a number of circumstances such as to process insurance applications or claims on insurance policies and when you transact on superannuation products.

What personal information do we collect?

Personal information collected by Eezy Insure generally comprises the following:

- name
- address
- date of birth
- gender
- marital status
- occupation
- contact details (including telephone, facsimile and e-mail) and
- financial information.

Sometimes we collect a few personal details unlikely to be known to other people to help us identify you over the telephone. We may monitor and record telephone calls for training and security purposes. Depending on the product or service offered by Eezy Insure we may collect the following:

- the number and ages of your dependents
- the length of time at your current address
- your employer's name and contact details
- the length of your employment & proof of earnings and if you have changed employer in the last few years, details of your previous employment.

Health and Lifestyle information

This information is a subset of personal information which includes information or opinion about an individual's:

- Past and current health e.g. blood tests, medical reports,
- Genetic information e.g. family history,
- Biometric information e.g. fingerprints;
- Sexual preferences or practices.
- Throughout the remainder of this document all references to "Personal information" should be read as references to both personal and sensitive information.
- For some of the products we arrange, such as life and income protection, sensitive information may be required such as:
 - medical information that relates to the insurance
 - lifestyle information that relates to the insurance.
- Sensitive information is subject to greater restrictions. Sensitive information may be required when you apply for life insurance products, to underwrite those products and when you claim on your policy regarding those products.
- Without your consent, we will not collect sensitive information about you. This is subject to some exceptions including:
 - the collection is required by law
 - when the information is necessary for the establishment, exercise or defence of a legal claim.

Withdrawing consent

Having provided consent for the collection, use and disclosure of your personal information, you are able to withdraw it at any time. To withdraw consent, please contact us and note that withdrawing your consent may lead to Eezy Insure no longer being able to provide you with our products or services.

4. Collection of personal information

EEZY Insure only collects personal information which is reasonably necessary for one or more of our functions or activities such as providing insurance products and services.

Before we collect sensitive information such as health information we obtain the consent of the individual involved unless otherwise permitted by law to collect that information.

EEZY Insure only collects personal information by lawful and fair means and generally we collect personal information about an individual only from that particular individual unless it is unreasonable or impracticable to do so. An example of when it may be unreasonable or impracticable to collect personal information only from the individual concerned would be collection by a law enforcement agency of personal information about an individual who is under investigation, where the collection may jeopardise the investigation if the information is collected only from that individual.

When we collect information about individuals we take reasonable steps to provide them with access to this privacy policy so that they know how we collect, use and disclose information.

Collection from a third party

In some cases, your personal information may be provided to us by a third party, such as:

- your financial planner or adviser,
- your employer or employer's adviser for corporate members,
- your health professional or accountant,
- trustees,
- partners,
- company directors and officers,
- customer's agents
- person's dealing with us on a one off basis
- any other party with which we have an arrangement for the promotion and sale of products offered or distributed by us.

Collection from young people

Requests from young people (those under 18 years of age) to acquire products or services from EEZY Insure in their own name is considered on its merits.

Notification

We shall take reasonable steps to let you know that we have your personal information, unless it is obvious from the circumstances that you know or would expect us to have the information, such as where a financial advisor is acting on your behalf. Reasonable steps may include asking the person who gave us your information to let you know that we have that information.

5. Disclosure of personal information

Depending on the product or service you have, Eezy Insure may also disclose some of your personal information to other parties such as the following:

Any person acting on your behalf, including your financial adviser, solicitor, accountant, executor, administrator, trustee, guardian or attorney

Affiliated product and service providers

Auditors we appoint to ensure the integrity of our operations

For corporate members, your employer or employer's adviser

For members of superannuation funds the insurer, to the trustee or administrator of the superannuation fund

If required or authorised to do so, regulatory bodies and government agencies

Insurers

Claims assessors and investigators (so that your claim can be assessed and managed)

Medical practitioners (to verify or clarify, if necessary, any health information you may provide); and

Other organisations which in conjunction with us provide products and services (so that they may provide their products and services to you).

Our solicitors, valuers, and insurers

We may also disclose your information to organisations which:

Are undertaking reviews of our systems and operations

Are third parties with which we have an arrangement with to provide us with a product or service

Are involved in providing, managing or administering your product or service such as the product issuer, third party suppliers, other Eezy Insure organisations, loyalty and affinity program partners, printers, posting services, call centres, information technology support, and our advisers

Are involved in maintaining, reviewing and developing our business systems, procedures and infrastructure including testing or

Are upgrading our computer systems

Are involved in the payments system including financial institutions, merchants and payment organisations

Are required or authorised by law, for example, to government or regulatory bodies for purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue.

We may also disclose your information to a third party where you have given your consent.

We may also disclose your information where you would reasonably expect us to disclose your information to that third party.

Like other financial service companies, there are situations where Eezy Insure may also disclose your personal information in circumstances where it is:

Required by law (such as to the Australian Taxation Office)

Authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests).

We also use the information we hold to help detect and prevent illegal activity. We co-operate with police and other enforcement bodies as required or allowed by law.

Where we hold your personal information in conjunction with that of another individual or individuals (e.g. where you jointly hold a policy), we will allow

each individual access to their own personal information and to the joint information (e.g. premium payments and status of policy) but not to the personal information of the other individual(s).

We disclose personal information when we outsource certain functions, including bulk mailing, direct marketing, debt recovery and information technology support. In all circumstances where personal information may become known to our contractors, agents and outsourced service providers, there are strict confidentiality arrangements in place.

Contractors, agents and outsourced service providers are not permitted to use or disclose personal information for any unauthorised purposes.

6. Accuracy and Correction of Personal Information

Our goal is to ensure that the personal information we hold is accurate, complete and up-to-date.

Please contact us if any of the details you have provided change. Please also contact us if you believe that the information we have about you is not accurate, complete or up-to-date.

We take steps to ensure that the personal information we collect is accurate, up to date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary.

If an individual requests access to the personal information we hold about them, or requests that we change that personal information, we will allow access or make the changes unless we consider that there is a sound reason under the Privacy Act or other relevant law to withhold the information, or not make the changes.

If we do not agree to provide access to personal information or to amend or annotate the information we hold about them, the individual may seek a review of our decision.

If we do not agree to make requested changes to personal information the individual may make a statement about the requested changes and we will attach this to the record.

Individuals can obtain further information about how to request access or changes to the information we hold about them by contacting us.

7. Security of Personal information

We strive to keep the information that you provide to us secure. We take all reasonable precautions to protect the personal information we hold about you from misuse and loss and from unauthorised access, modification or disclosure. We have a range of practices and policies in place to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them. Our security measures include, but are not limited to:

- educating our staff as to their obligations with regard to your personal information
- requiring our staff to use passwords when accessing our systems
- employing firewalls, intrusion prevention systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing
- providing secure storage for physical records
- employing physical and electronic means including access controls (as required) to protect against unauthorised access to buildings.
- 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 according to our internal policies.

8. Your rights to access information that we hold

Under current privacy legislation, you are generally entitled to access the personal information we hold about you. If you wish to access your personal information, we ask that you put this request in writing. This process will assist us in identifying you and will also assist us by identifying your policy number/s and the type of information to which you are requesting access.

We will respond to your Request for Access request as soon as possible and aim to comply with your request within 28 days. The time we require to process your request will depend upon the type of information you have requested. In certain circumstances, you may not be entitled to access the personal information we hold about you. For example, you may not be able to access the personal information held about you if providing you with access would unreasonably interfere with the privacy of others. If this happens, we will give you reasons as to why we are unable to provide you access. An access charge may apply, but not to the request itself. The charge will not be excessive. Your access to your personal information is subject to some exceptions allowed by law.

Factors which would impact on your right to access would include:

- access would pose a serious threat to the life or health of any individual
- access would have an unreasonable impact on the privacy of others
- the information relates to a commercially sensitive decision making process
- access would be unlawful
- access would prejudice enforcement activities relating to criminal activities and other breaches of law, public revenue, a security function or negotiations with you
- legal dispute resolution proceedings where a third party has given us health information about you in confidence denying access is required or authorised by or under law

We will give you reasons if we deny access. We will also let you know the mechanisms available to complain about the denial.

9. Identification and Verification

We are required by law to identify you in some circumstances, such as when assisting with a claim. Anti-money laundering laws require us to sight and record details of certain documents (i.e. photographic and non-photographic documents) in order to meet the standards set under those laws.

We may take steps to verify the information we collect; for example, a birth certificate provided as identification may be verified with records held by the Registry of Births, Deaths and Marriages to protect against impersonation, or we may verify with an employer that employment and remuneration information provided in a claim for income protection is accurate.

10. Direct Marketing and Opting Out

Personal information is shared between Eezy Insure and other companies with which it has a business relationship. They may provide you with information on their products and services which we consider may be of interest to you. Eezy Insure discloses your personal information to a number of its related bodies corporate which assist us in providing you with products or services.

Eezy Insure may disclose some of your personal information to external organisations who assist us in administering the provision of the products or services to you. For example, mailing houses, which send you your annual statement or other organisations with which we have an arrangement for the promotion and sale of products or services offered by us. If you do not want your personal information to be used in this way, please let us know.

We may also use personal information held about you to keep you informed of new products or special arrangements offered or distributed by us, or other organisations with which we have a business relationship, or to conduct marketing activities, and may disclose information about you to our service providers for this purpose.

We may disclose your personal information, other than sensitive information (unless you provide consent), for the purposes of direct marketing if we collected the information from you and you would reasonably suspect that we would disclose your information for that purpose, and we provide a simple means for you to opt out of direct marketing.

We may also disclose your personal information, other than sensitive information (unless you provide consent), for direct marketing purposes if we did not collect that information from you, but you gave your consent, or it is impractical to obtain that consent. In such a case, we will include information about how to opt out of receiving direct marketing, in every publication we present to you.

To opt-out of receiving marketing information altogether, please contact us.

11. How to contact Eezy Insure

Eezy Insure may be contacted by post, phone, fax or email:

204 / 530 Lt Collins St

Melbourne VIC 3000

Telephone: 1300 259 365

Fax: 03 9013 9363

Email: info@lifeandinsurance.com.au

Website: www.lifeandinsurance.com.au

If you have a privacy related complaint, please contact our Complaints Resolution Officer

Complaints Resolution Officer

204 / 530 Lt Collins St

Melbourne VIC 3000

If you have any privacy related questions or would like further information on Eezy Insure's privacy and information handling practices, please contact the

Attn: Privacy Officer.

204 / 530 Lt Collins St

Melbourne VIC 3000

12. How we handle privacy related complaints

Eezy Insure has a centralised internal complaints process. Complaints handling is a key component of Eezy Insure's compliance management framework, as our regulatory obligations include having a strong internal complaints process as well as being a member of appropriate external complaints schemes.

We aim to deal with all complaints within a reasonable timeframe and in a fair and efficient manner. To lodge a complaint you can write to us using the contact details above, or make contact by phone. If we cannot deal with your issue straight away we will acknowledge your correspondence, normally within a few days.

If your complaint requires further investigation, we will aim to resolve it within 45 days. If we cannot resolve it within that timeframe, we will contact you and let you know the reasons for the delay and what extra time we may need.

In any event, throughout the investigation of your complaint we will provide you with updates of our progress so that you are aware of what is happening at all times.

Your complaint will be handled by a complaints manager who will deal with you personally to discuss your complaint, including any proposed resolution.

In the event that Eezy Insure is unable to resolve your complaint to your satisfaction, we will inform you as to how you can escalate the complaint to the appropriate external dispute resolution body. In cases of privacy related complaints, this is generally the Office of the Australian Information Commissioner

13. Cross Border Disclosure to overseas countries

Generally, we do not disclose information to overseas countries and when we do so we take reasonable steps to ensure that the overseas entity protects that information against unauthorised access or loss. Currently Eezy Insure is likely to disclose customer information to the following countries:

- India

14. Changes to this Privacy Policy

We reserve the right to review and amend this Privacy Policy from time to time, particularly to take into account any changes to legislative or regulatory requirements. Updated versions will be made available on our website or are available free of charge on request.

Eezy Insure will review this policy from time to time, in order to consider new laws and technology, changes to our operations and practices, and to make sure our policy remains appropriate.