

PO Box 6, Niddrie 3042
Suite 2, Level 1/326 Keilor Rd,
Niddrie Vic. 3042

T (03) 9379 4555
F (03) 9379 4233
E insurance@kib.net.au

www.kinnane.com.au

ABN 53 178 905 686
ACN 078 196 657
AFSL 241064

The logo for Kinnane Insurance Brokers features a stylized graphic of several overlapping blue lines that form a grid-like pattern, extending from the top right towards the center of the page. To the left of this graphic, the words "KINNANE INSURANCE BROKERS" are written in a clean, sans-serif font, with "KINNANE" on the top line, "INSURANCE" on the second line, and "BROKERS" on the third line.

KINNANE
INSURANCE
BROKERS

Kinnane Insurance Brokers Pty Ltd

PRIVACY POLICY STATEMENT

At Kinnane Insurance Brokers Pty Ltd, we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws and how you can access the personal information we hold and how to have that information corrected.

The Privacy Amendment (Enhancing Privacy Protection) Act sets out a number of Australian Privacy Principles (APPs). Our aim is to both support and ensure we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

We encourage you to check our website regularly for any updates to our privacy policy.

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. This can include a broad range of information ranging from your name, address, contact details, age, to other information about your personal affairs including your assets, personal belongings, financial situation, health and wellbeing. We provide 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 or to fund your premium and on what terms.

When you make a claim under your policy, 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, eg loss adjusters, medical brokers etc) to enable it to consider your claim. Again this information may be passed on to reinsurers.

From time to time, we will use your contact details to send you direct marketing communications including offers, updates and newsletters that are relevant to the services we provide. We always give you the option of electing not to receive these communications in the future. You can unsubscribe by notifying us and we will no longer send this information to you.

As a financial services organization we are subject to certain legislative and regulatory requirements which necessitate us to obtain personal information about you, including s961B of the Corporations Act. We collect information about you for the purpose of reporting AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

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.

In certain circumstances we are required to collect government identifiers, such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorized by law or unless you have voluntarily consented to disclose this information to any third party.

Personal information will be treated as confidential information and sensitive information will be treated highly confidential.

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

We can only fully advise you and assist in arranging your insurance or with a claim, if we have all relevant information. The insurance laws also require you to provide your insurers with the information they need in order to be able to decide whether to insure you and on what terms. You have a duty to disclose the information which relevant to the insurer's decision to insure you.

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 or by using a pseudonym where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

How do we collect your personal information?

Kinnane Insurance Brokers Pty Ltd collects personal information in a number of ways, including:

- Directly from you, when you attend face to face meetings/interviews
- Directly from you, when you provide information through a data collective form
- Directly from you, when you provide information by phone
- Directly from you, via an email or the internet and
- Directly from product issuers once authorization has been provided by you.

You have a right to refuse us authorization to collect information from a third party.

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information, we will determine whether or not it would have been permissible to collect that personal information if it had been solicited. If we determine that collection would not have been permissible, to the extent permitted by law, we will destroy or de-identify that personal information as soon as practicable.

When do we disclose your information overseas?

If you ask us to seek insurance terms and we recommend an overseas insurer, we may be required to disclose the information to the insurer located outside Australia. For example, if we recommend a

policy provided by Lloyd's of London, your information may be given to the Lloyd's broker and underwriters at Lloyd's of London to make a decision about whether to insure you.

We will tell you at time of advising on your insurance if they are overseas and in which country the insurer is located. If the insurer is not regulated by laws which protect your information in a way that is similar to the Privacy Act, we will seek your consent before disclosing your information to that insurer.

Australian and overseas insurers acquire reinsurance from reinsurance companies that are located throughout the world so in some cases your information may be disclosed to them for assessment of risks and in order to provide reinsurance to your insurer. We do not make this disclosure, this made by the insurer (if necessary) for the placement for their reinsurance program.

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 initially in a working file, which when completed is electronically imaged and stored, after which any paper is destroyed in our onsite shredder. In some cases, your file is archived and sent to an external data storage provider for a period of time. We only use storage providers located in Australia who are also regulated by the Privacy Act.

We ensure that your information is safe by protecting it from unauthorised access, modification and disclosure. We maintain physical security over our paper and electronic data and premises, by using locks and security systems. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to computer systems where your information is stored.

It is a legislative requirement that we keep all personal information and records for a period of 7 (seven) 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, e.g. to handle mailings on our behalf, external data storage providers or to other companies in the event of a corporate sale, merger, re-organisation, dissolution or similar event. However, we will take reasonable measures to ensure that they protect your information as required under the Privacy Act.

We may provide your information to others if we are required to do so by law, you consent to the disclosure or under some unusual other circumstances which the Privacy Act permits.

In the event 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, irrelevant, out of date or incomplete.

Kinnane Insurance Brokers Pty Ltd will take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- Inform us of any errors in your personal information as soon as possible; and
- Update us with any changes to your personal information as soon as possible.

If you wish to access or correct your personal information please write to our managing director Joseph Del Mastro at Kinnane Insurance Brokers Pty Ltd, Suite 2, Level 1/326 Keilor Road Niddrie Vic 3042.

We do not charge for receiving a request for access to personal information or for complying with a correction request. Where the information requested is not a straightforward issue and will involve a considerable amount of time then a charge will need to be confirmed for responding to the request for the information.

In some limited cases, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal in a written explanation. Some exceptions include;

- 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 authorized 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.

What happens if you want to complain?

If you have concerns about whether we have complied with the Privacy Act or this privacy Policy when collecting or handling your personal information, please write to our managing director Joseph Del Mastro at Kinnane Insurance Brokers Pty Ltd, Suite 2, Level 1/326 Keilor Road Niddrie Vic 3042.

Your complaint will be considered by us through our internal complaints resolution process and we will try to respond with a decision within 45 days of you making the complaint.

If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner

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.

You can be given the opportunity to 'opt-out' from receiving communications from us or third parties that send communications to you. You may 'opt-out' from receiving these communications such as newsletters, emails and other marketing and promotional materials, by clicking on an unsubscribe link at the end of an email. We maintain details of the source of your personal information used for direct marketing and you have the right to request these details. We will endeavor to meet any requests within 2 weeks. We maintain a register for those individuals not wanting direct marketing material.

Website information and content

The information provided on this website does not cover all aspects of the law on the relevant subject matter. Professional advice should be sought before any action is taken based upon the matters described and discussed on this site.

To the extent permitted by law, we make no representations about the suitability of the content of this site for any purpose. All content is provided without any warranty of any kind. We disclaim all warranties and conditions with regard to the content, including but not limited to all implied warranties and conditions of fitness for a particular purpose, title and non-infringement.

We will not be liable for any damages or injury caused by, including but not limited to, any failure of performance, error, omission, interruption, defect, delay in operation of transmission, computer virus, or line failure. To the extent permitted by law we will not be liable for any damages or injury, including but not limited to, special or consequential damages that result from the use of, or the inability to use, the materials in this site.

We believe the content of this site to be accurate, complete and current, however there are no warranties as to the accuracy, completeness or currency of the content. It is your responsibility to verify any information before relying on it. The content of this site may include technical inaccuracies or typographical errors.

We reserve the right to modify the content of this site from time to time.

Anonymous data – We use technology to collect anonymous information about the use of our website, for example when you browse our website our service provider logs your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our website, to better understand our clients and markets and to improve our services.

Cookies – In order to collect this anonymous data we may use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. Once you leave the site, the cookie is destroyed and no personal or other information about you is stored.

Forms - Our Website allows visitors to submit information via Self-Service forms (Claim Forms, Employment and Contact request). The information submitted via the Forms is **not** encrypted – an option is available for claim forms to be downloaded in PDF format for faxing. Should you be concerned about confidentiality of the claim information, this would be the recommended method.

Information collected via on-line forms is sent to our offices via EMAIL (not encrypted) and is also stored on a database which is accessible by Kinnane Insurance Brokers Pty Ltd staff only (password protected).

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 occasionally notify you direct marketing 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 or do not wish to receive it electronically, email or write to us.

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

Tell us what you think

We welcome your questions and comments about privacy. If you have any concerns or complaints, please contact our Privacy Officer Joseph Del Mastro on telephone number 03) 9379 4555 or by email joe@kib.net.au.