

PRIVACY POLICY (Australia)

Current as at 11 June 2020

1. Responsibility

- a) Claim Central Consolidated Pty Ltd (ABN 44 602 460 953) and its related bodies corporate (**Claim Central**) respects your right to privacy and is committed to safeguarding the privacy of its customers and website visitors. Claim Central adheres to the *Privacy Act 1988* (Cth) (the **Act**) and the Australian Privacy Principles. Claim Central deals with Personal Information collected by it in accordance with this Privacy Policy (**Policy**). When used in this Policy, “Personal Information” has the meaning given in the Act, being in general terms, information or opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not and whether the information or opinion is recorded in material form or not.
- b) Claim Central has implemented practices, procedures and systems to ensure compliance with the Act and the Australian Privacy Principles and to deal with complaints and enquiries concerning your Personal Information.
- c) Claim Central’s Privacy Officer has overall responsibility for ensuring that Claim Central and its employees, agents and subsidiaries comply with this Policy.
- d) Claim Central collects information only by lawful and fair means.
- e) By interacting with Claim Central, submitting information to Claim Central, or signing up for any services offered by Claim Central, you are deemed to agree and consent to Claim Central (and its related body corporates, representatives and/or agents) collecting, using or disclosing and sharing your Personal Information in the manner set forth in this Policy

2. Collection of Personal Information

- a) Claim Central collects the following kinds of Personal Information:
 - i) Your identity particulars, including your name, address, phone number, mobile number, and email address;
 - ii) Details of services or products you acquire from Claim Central or which you enquire about, together with any additional information necessary to deliver those services or products and respond to your enquiries;
 - iii) Personal Information you provide to Claim Central through Claim Central’s service centres or in response to customer surveys;
 - iv) Any additional Personal Information you provide to Claim Central online, by telephone, by email or otherwise to Claim Central representatives, or via your agents; and
 - v) The contents of telephone conversations between you and Claim Central representatives.

- b) Claim Central collects Personal Information from you in a variety of ways, including when you interact with us electronically or in person, when you access our websites and when we provide our services to you. Claim Central will collect your Personal Information only from you unless it is unreasonable or impracticable to do so. Claim Central will take reasonable steps to inform you if it collects Personal Information about you from someone else.

3. Purposes for which Personal Information is held and used

- a) Claim Central holds, uses and discloses your Personal Information (including credit information) for the following purposes:
 - i) to provide its services and products and undertake associated business processes and functions;
 - ii) for administration, planning and account management;
 - iii) to monitor, develop and improve the quality of its services;
 - iv) to send you information that is relevant to the provision of its services;
 - v) to answer or process enquiries or complaints, and provide information or advice;
 - vi) to send direct marketing to you in relation to the products, services and benefits Claim Central provides to keep you informed of new developments Claim Central believes may be of interest to you. Direct marketing may be sent to you in a variety of ways including, via email, via SMS, via social media or online. You may opt-out of receiving direct marketing at any time through the unsubscribe function that will be made available to you with each direct marketing communication that Claim Central sends;
 - vii) to comply with any law, rule or regulation or binding determination, or to cooperate with any governmental authority; and
 - viii) for any other purpose disclosed to you at the time Claim Central collects your Personal Information.

4. Disclosure of Personal Information

- a) Claim Central will share your Personal Information with third parties only in the ways that are described below:
 - i) to Claim Central's contractors or service providers for the purposes of conducting its business and providing its services or products to you, including web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
 - ii) to any partners, agents or intermediaries who are a necessary part of the provision of Claim Central's products and services;
 - iii) to any partners, agents or vendors that you have authorised to have access to your Personal Information in connection with the provision of Claim Central's products or services
 - iv) to any government regulatory bodies that normally require it or may request it;
 - v) to its related bodies corporate;
 - vi) as may be required under any other law; and

- vii) in relation to any corporate actions relating to Claim Central or its related bodies corporate including selling or buying any business or assets.
- b) Any of the recipients referred to in section 4.a) may be located overseas. Where Personal Information is sent overseas, it is likely to be one of the following:
 - i) United States;
 - ii) New Zealand; and
 - iii) South Africa.

5. Retention

- a) Personal Information will be retained only for as long as may be needed for the fulfilment of the purpose(s) for which the information is collected, used or disclosed, or as required by the Act, any other law or a court/tribunal order.
- b) Claim Central will take reasonable steps to ensure that your Personal Information is accurate, complete, and up to date, to minimise the possibility that inappropriate information may be used to make a decision about you.
- c) Claim Central will not routinely update your Personal Information, unless such a process is necessary to fulfil the purposes for which the information is collected, used or disclosed.

6. Security of your Personal Information

- a) Claim Central will take reasonable steps to maintain the security of your personal information. Claim Central has in place a range of security safeguards to protect your Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification, regardless of the format in which it is held.
- b) The methods of protection may depend on the sensitivity of the information and the format in which it is contained. Security measures employed by Claim Central include:
 - i) technological measures including SSL 128-bit encryption for all data transfers over the Internet;
 - ii) physical measures such as locked filing cabinets and restricted access to offices;
 - iii) strategic measures such as security clearances and limiting access to a "need-to-know" basis; and
 - iv) Claim Central ensures that its staff are aware of the importance of maintaining the confidentiality of personal information.
- c) The transmission and exchange of information is carried out at your own risk. Claim Central cannot guarantee the security of any information that you transmit to it or receive from it.

7. Access to your Personal Information

- a) You may request details of Personal Information that Claim Central holds about you at any time by contacting Claim Central at: privacy@claimcentral.com.au. Where Claim Central holds Personal Information that you are entitled to access, Claim Central will within a reasonable period of your request (and always within 30 days of any such request) allow you access to that information. The requested information shall be provided or made available in the manner requested by you, if it is reasonable and practicable to do so, or otherwise in a suitable form such as by mailing or emailing it to you.

- b) You may point out to Claim Central that any Personal Information held by Claim Central is inaccurate, out of date, incomplete, irrelevant or misleading, and request correction or deletion by emailing us at: privacy@claimcentral.com.au. Claim Central will take appropriate action to amend the information as required, give you notice of any correction and, if requested take reasonable steps to, or if required by the Act, notify any third party to whom the information has been disclosed of the correction. If Claim Central does not agree that there are grounds for amendment of your information then it will set out the reasons for its decision in writing and the mechanisms available to complain about the refusal, and upon request by you it will add a note to the personal information stating that you disagree with it.
- c) There may be circumstances that preclude Claim Central from providing access to some or all of your Personal Information. For example, those circumstances could include:
 - i) the information may impact on the privacy of other individuals;
 - ii) the information is commercially sensitive evaluative information;
 - iii) the information is subject to privilege;
 - iv) Claim Central is prohibited by law from providing you with access; or
 - v) the disclosure could reasonably be expected to threaten the safety, physical or mental health or life of an individual.
- d) If Claim Central decides that it cannot grant you access to your Personal Information, or grant access in the manner requested by you, it will set out the reasons for its decision in writing and the mechanisms available to complain about the refusal.

8. Complaints

- a) Claim Central takes all complaints seriously and will investigate all complaints.
- b) If you believe there has been a breach of the Australian Privacy Principles, or if you have any other concerns about Claim Central's handling of your Personal Information, please speak to your usual contact at Claim Central in the first instance. Claim Central staff will be pleased to help and complaints can often be resolved at this early stage. If your concerns cannot be resolved at the first point of contact, the matter should be referred to Claim Central's Privacy Officer (contact details below). At this stage, Claim Central will ask you to set out your complaint in writing providing as much detail as you can so that Claim Central's Privacy Officer can fully investigate your complaint. Claim Central will then contact you with the results of its findings. You should allow up to thirty days from the time of your initial complaint, or such longer period as may be agreed to by you, to receive a response.

9. Contacting Claim Central

- a) If you have any questions or concerns about this Policy or the collection, use or handling of your personal information, you may contact the Claim Central Privacy Officer on 1300 743 673 or at privacy@claimcentral.com.au or 1/149 Beauchamp Road, Matraville NSW 2036.

10. Office of the Australian Information Commissioner (OAIC)

OAIC is a government agency which oversees the Act and related legislation and investigates complaints about handling of Personal Information under the Act. OAIC will in many cases only investigate cases once Claim Central has been given the opportunity to resolve your complaint internally. You may lodge your complaint with OAIC by sending the necessary documents and information to:

Office of the Australian Information Commissioner
GPO Box 5218, Sydney NSW 2001

11. Tracking Technologies

- a) Claim Central and its marketing partners, affiliates, or analytics or service providers, use technologies such as cookies, beacons, tags, and scripts, to analyse trends, administer the website, tracking users' movements around the website, and to gather demographic information about our user base as a whole. Claim Central may receive reports based on the use of these technologies by these companies on an individual and aggregated basis.
- b) Claim Central uses Internet technologies like cookies and web beacons to facilitate the services it provides on its websites and your use of its websites. A "cookie" is a text file placed on your computer's hard drive by a web server, which allows for personalisation of certain aspects of your visit to that website. "Web beacons" are transparent electronic images placed in the web code that collect non-personal data while visiting a website. Cookies and web beacons can usually be disabled by changing your browser preferences. Your browser usually has documentation on how to disable cookies and web beacons. Note that disabling cookies may limit the performance of Claim Central's websites. If cookies are disabled, certain features of Claim Central's websites may not function properly.
- c) Claim Central may partner with a third party to either display advertising on the Claim Central website or to manage Claim Central's advertising on other sites. Claim Central's third-party partner may use technologies such as cookies to gather information about your activities on this website and other sites in order to provide you advertising based upon your browsing activities and interests.
- d) Claim Central gathers certain information automatically and store it in log files. This information may include Internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. Claim Central does not link this automatically collected data to other information it collects about you.
- e) The Claim Central website may be linked to or from third party websites. These links are provided as a convenience only. Claim Central is not responsible for the content or privacy principles of websites that are linked to or from the Claim Central websites. You are advised to review the privacy policies of any third-party websites you visit.

12. Changes to this Policy

This Policy is available on the Claim Central website. Claim Central may change this Policy from time to time. Any updated versions of this Policy will be posted on the website. If Claim Central makes any material changes Claim Central will notify you by means of a notice on its website prior to the change becoming effective. Claim Central encourages you to periodically review this page for the latest information on Claim Central's privacy practices.