

## Guy Carpenter Privacy Policy

### ABOUT THIS POLICY

Guy Carpenter & Company Pty. Ltd. (ABN 95 000 351 299) and its associated entities (we, our, us) value the privacy of your personal information and we are committed to handling your personal information in a responsible way in accordance with the *Privacy Act 1988 (Cth)* (the Act). This is our Privacy Policy and its sets out how we will collect, hold, use and disclose your personal information. We recommend that you read it carefully.

### WHY WE COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION?

We collect, hold, use and disclose personal information so that we can perform our business activities and functions and to provide customer services. Our business activities include providing reinsurance and risk services such as arranging reinsurance policies and advising on reinsurance options, managing claims or consulting on other risks for our clients.

On all occasions, your information is collected, held, used and disclosed by us in accordance with this Privacy Policy.

If you want to deal with us while not identifying yourself (i.e. anonymously or by using a pseudonym), we will allow you to do this where it is practicable (for example when you make a general inquiry of us). Please tell us if you wish to do this and we will indicate whether, given the nature of the transaction, it is practicable.

It is important to note that many of the products we arrange or services we provide require us to either obtain personal information or to identify the individuals we are dealing with. If you decide not to provide us with the information required we may not be able to provide a service or arrange a product, or provide you with information about a service or product that you may want (including information about discounts) or we may be unable to tailor the content of our websites to your preferences and your experience of our website may not be as enjoyable or useful.

### THE PERSONAL INFORMATION WE COLLECT & HOLD?

When used in this Privacy Policy, the term 'personal information' has the meaning given to it in the Act. In general terms, personal information is information or an opinion that can be used to personally identify you, whether the information or opinion is true or not.

We may also collect and hold your sensitive information where you have provided us with consent to do so. Sensitive information includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional trade or association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information or biometric information.

The personal information we collect from you directly, or from a third party such as your employer, your insurer or a reinsurer, other individuals (such as a co-insured) or other representative authorised by you may include but is not limited: to your name; address; date of birth; gender; other contact details such as your phone number, fax and email; occupation; salary; relevant financial information; claims history, driving history, details of insurance policies you hold or have held, health, medical or lifestyle information relevant to arranging an insurance product or providing a service; financial institution account details like

your credit card or bank account number if the product or service is being paid for in this way or we are making a payment to you; employment history and other information collected during the recruitment process; and/or any other information you provide to us directly or indirectly through a website or via a representative.

#### **HOW WE COLLECT YOUR PERSONAL INFORMATION**

We may collect information about you in various ways, including: over the telephone; in person; over the internet, including via our website, online forms and surveys, email or cookies and in writing, including via hard copy forms.

#### **Cookies**

We may use cookies to store information provided by your web browser when you visit our websites. The only information cookies can contain is information you supply. The information that may be maintained by a cookie is used by us solely to help us manage our website, improve features of the website and understand usage patterns. This may include items such as: username; the pages visited on our website; the date and time of the visit; the internet address of the referring site; the version of the browser used; the capabilities of the browser; and the search terms used on our search engines. You are able to use your browser settings to manage cookies. These settings may include deleting all or some of the cookies, not accepting any cookies or being notified when cookies are being used. Sometimes if you decide not to allow or accept a cookie, it may affect your use or the functionality of websites.

#### **FROM WHOM WE COLLECT PERSONAL INFORMATION**

We may collect such information directly from you or through a third party such as your employer or other representative authorised by you, your insurers, our authorised representatives, agents or associated entities, another party involved in a claim, investigators, loss adjusters and/or legal advisers.

We may also seek to collect information about someone else from you. If you provide us with information about other individuals, we rely on you to have made them aware that you will or may provide their information to us, the purposes for which we use it, the types of third parties we disclose it to and how they can access it (as described in this Privacy Policy). If it is sensitive information we rely on you to have obtained their consent to the above. If you have not done these things, you must tell us before you provide the relevant information.

#### **FOR WHAT PURPOSE DO WE COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION**

We collect, hold, use and disclose your information so we can perform our business activities and functions. We will collect, hold, use and disclose your information for the purpose it was provided to us, related purposes or as permitted by law. Such purposes include:

- providing services to our clients, arranging products for our clients and to send communications requested by clients;
- answering enquiries and providing information or advice about existing and new products or services;
- providing you with access to protected areas of our website;
- for market research so that we can better understand our customer's needs and tailor our future services accordingly;

- providing you with marketing information regarding other products and services (of ours or a third party) which we believe may be of interest to you;
- updating our records and keeping your contact details up to date;
- quality assurance, auditing and training purposes;
- processing and responding to any complaint made by you;
- to conduct administration and business processing functions including providing personal information to our associated entities, contractors, service providers or other third parties;
- facilitating our business operations such as managing our IT infrastructures, databases, websites and for statistical and maintenance purposes;
- complying with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (where relevant).

#### **HOW WE DISCLOSE YOUR PERSONAL INFORMATION**

We may disclose your information to:

- our employees, authorised representatives, associated entities, and contractors, as required to perform their roles in arranging products and providing services, or to referrers;
- other business support service providers for the purposes of the operation of our business including, without limitation, IT systems administration, web hosting providers, document storage warehouses, printing and mail houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors and professional advisers such as accountants, solicitors, business advisers and consultants;
- insurers, reinsurers, other insurance or reinsurance intermediaries and premium funders;
- a person authorised by you or a third party such as your employer;
- in the case of some claims (or likely claims), assessors, solicitors, repairers, builders, investigators, your employer or medical practitioners and rehabilitation providers;
- suppliers and other third parties with whom we have commercial relationships for business, marketing, and related purposes;
- the Financial Ombudsman Service (which is an external dispute resolution scheme);
- government bodies, regulators, law enforcement agencies and any other parties where required by law;
- We may combine or share any information that we collect from you with information collected by any of our associated entities.

#### **CROSS-BORDER DISCLOSURE**

In the ordinary course of business including the purposes outlined above, we may disclose personal information about you to a person or organisation located in countries outside of Australia such as the United States, United Kingdom, India, Singapore (e.g. to overseas insurers, reinsurers, insurance or reinsurance intermediaries, our associated entities and third party suppliers or service providers). A list of countries where we may disclose your personal information is provided at the end of this Privacy Policy. We take reasonable steps to ensure that overseas recipients of your information do not breach the privacy obligations relating to your personal information.

#### HOLDING PERSONAL INFORMATION

We may hold your information electronically and on paper/in hard copy. We place a high priority on the security of personal information, and we are committed to protecting the personal information that you provide to us. We take reasonable steps to ensure your personal information is secure and we use and maintain appropriate safeguards to prevent misuse and loss and from unauthorised access, modification or disclosure. We implement administrative, physical and technical safeguards to protect the confidentiality and integrity of your personal information and data that we use and hold.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

We include links to other websites whose privacy policies we do not control. Once you leave our servers (you can tell where you are by checking the URL bar on your browser), use of any information is governed by the privacy policy of the operator of the site you are visiting. That policy may differ from ours.

#### DIRECT MARKETING

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms including mail, fax and electronic media such as email and SMS and social media such as Twitter and Facebook, in accordance with applicable marketing laws such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication we will endeavor to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by using the opt-out facilities provided within the marketing communications.

We do not share, sell, rent or disclose your personal information to other organisations without your consent, except to the extent required by law, in accordance with your instructions, or as described in this Privacy Policy.

#### HOW YOU MAY ACCESS YOUR PERSONAL INFORMATION AND SEEK CORRECTION OF IT

##### Accessing your information

You may request access to any personal information we hold about you at any time by contacting our Privacy Officer (see 'How to contact us or make a complaint' section below). Where we hold information that you are entitled to access, we will try to provide you with mutually agreeable means of accessing it (for example, by mailing or emailing it to you or facilitating inspection). Our Privacy Officer will need to establish the identity of the individual requesting the information prior to providing it. A fee may apply to recover reasonable costs of making the information available.

There are a number of situations where we may deny an individual access to personal information. These can include circumstances where it would have an unreasonable impact on the privacy of other individuals, would result in a breach of confidentiality, the information relates to existing or anticipated legal proceedings, we have reason to suspect that unlawful activity or misconduct of a serious nature is being or may be engaged in, or where the law requires or authorises such access to be denied. Our Privacy Officer will advise you if any of these or other circumstances apply.

### Keeping your information accurate

We take reasonable steps to ensure that the personal information we hold is accurate, up-to-date and complete. However, we also rely on you to advise us of any changes to your information to help us do so. If you believe your personal information is not accurate, up-to-date or complete, then please contact your Guy Carpenter adviser or our Privacy Officer (see “How to contact us or make a complaint” section below).

### HOW TO CONTACT US OR MAKE A COMPLAINT?

If you have any questions about this Privacy Policy, any concerns or a complaint regarding the treatment of your personal information or a possible breach of your privacy, you can contact our Privacy Officer using the details set out below.

We treat any concerns or complaints that you may have with respect and confidentiality. A privacy representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We aim to ensure complaints are resolved in a timely and appropriate manner.

You can contact our Privacy Officer by:

- Email – [privacy.australia@guycarp.com](mailto:privacy.australia@guycarp.com)
- Phone – (02) 8864 8571
- Post – PO Box H176, Australia Square NSW 1215

If your concerns are not resolved to your satisfaction or you would like further information in regards to the Privacy Act, the matter can be referred to the Office of the Australian Information Commissioner on 1300-363-992.

### CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time. Any updated versions of this Privacy Policy will be posted on our website.

This Privacy Policy was last updated on 12 September 2014

## Overseas Disclosure

We may share or disclose your personal information to persons and organisations located overseas. Where practicable, we will list those countries here.

This list is current as at 12 September 2014. It will change from time to time. Please ensure you check it regularly for changes.

Function and Activities covered	Countries
Our Reinsurance Broking, Intermediary, Analytical and Risk Advisory Services	Bermuda, Brazil, China, Dubai, Hong Kong, Ireland, Japan, New Zealand, Singapore, South Korea, United Kingdom and the United States.
Business Support Service Providers (for example, IT systems administration and payment processing)	Canada, India, United Kingdom and the United States.