Suncorp Group Ltd

Suncorp Group Privacy Policy

We are committed to ensuring that your personal information is protected.

It is important to understand that our companies provide a wide range of financial services and products and our companies may use and disclose your personal information in different ways.

Who are We?

The Suncorp Group is the name we use to describe ourselves. Suncorp Group Limited is the owner of a group of companies that offer a range of financial products and services in banking, general insurance, life insurance, superannuation and investment products across Australia and New Zealand.

The Suncorp Group consists of a large number of different companies and well known brands including:

Our bank brand

- Suncorp Bank

Our general insurance brands

- Suncorp
- GIO
- Vero
- AAMI
- Australian Alliance Insurance
- Apia
- CIL
- Just Car Insurance Agency
- Comprehensive Travel
- InsureMyRide
- Shannons
- Bingle
- Terri Scheer

Our life and wealth management brands

- Suncorp
- Asteron
- Guardian Financial Planning
- Cameron Walshe
- Standard Pacific

Our other financial products or services brands

- Australian Surety
- Deposit Power

What does our Privacy Policy do?

Our Privacy Policy is designed to provide you with general information about how the Suncorp Group collects, stores, uses and discloses your personal information.

All companies in the Suncorp Group adhere to privacy legislation and this Privacy Policy. However, as our products and services differ and we engage in a variety of different activities, your personal information will be collected, used and disclosed in the ways necessary for that particular Suncorp Group business to provide you with the product or service.

When you decide to purchase or acquire a product or service from us we will provide you with further information about privacy in the form of a Privacy Statement or other form of privacy disclosure **('Privacy Statement').**

The Privacy Statement will give you specific information about how we will handle the personal information you have given the Suncorp Group. We may also seek your specific consent in relation to the collection, use or disclosure of your personal information. You may also deal with us because you are a third party who is involved with one of our companies, for example, you are in a car accident with our insured, we interview you as a witness or a party associated with our insured for the purpose of the investigation and management of the insured's claim, or you may also enter a competition or seek further information from us. We will collect, use and disclose your personal information in accordance with privacy legislation and this Privacy Policy.

We encourage you to review and check our websites regularly for any updates to this Privacy Policy.

If you wish to obtain information about how your personal information is being dealt with by one of our businesses then you should contact them directly.

What is "personal information"?

Personal information is information about an identifiable individual and includes facts or an opinion about you that identifies you or by which your identity can be reasonably determined. Personal information also includes "sensitive information" which is also personal information and which is about your:

- health;
- political opinions;
- membership of a political, professional or trade association;
- racial or ethnic origin;
- religious beliefs or affiliation;
- philosophical beliefs;
- membership of a trade union;
- sexual preferences or practices;
- criminal record; and / or
- genetic information.

The Suncorp Group collects, uses or discloses personal information in accordance with its obligations under the Australian and New Zealand privacy regimes and this Privacy Policy.

What type of personal information do we ask you for?

We will usually ask you for a broad range of personal information. The specific type of personal information which we will collect will depend on which of the companies in our Group you do business with and the type of product or service you choose from us. The details of exactly what personal information we need will be found on:

- the written forms we ask you to complete;
- the questions we ask you on the telephone;
- our web sites via the internet; and / or
- what we ask you in person in our branches, service centres or stores.

You can expect to be asked for the following types of personal information:

- your name, address and contact details;
- date of birth;
- your gender; and / or
- information about your use of our product or service.

As we are a financial services group providing a range of banking, life, wealth and general insurance products and services, depending on the product or service you choose, you can also expect to be asked for some of the following types of personal information:

- insurance history;
- employment information;
- your marital status and family circumstance;
- health and pastime information;
- tax file number;
- details about your home, your contents, your holiday, your car, your business;
- your financial history;
- your credit history; and / or
- bankruptcy record

How do we store your personal information?

We store your personal information in a variety of ways. These may include:

- in computer systems or databases;
- in hard copy or paper files; and
- in telephone recordings.

Why do we need your personal information?

The collection of your personal information is essential to enable us to conduct our business of offering and providing our range of financial products and services. We generally collect your personal information for the purposes of:

- identifying you when you are doing business with us;
- protecting your personal information from unauthorised access;
- establishing your requirements and providing you with the appropriate product or service;
- setting up, administering and managing our products and services;
- assessing and investigating a claim made by you under one or more of our products; and
- understanding your needs and improving our financial products and services and product development, including training and developing our staff and representatives.

In some parts of our Group we are required to collect your personal information to satisfy our legal obligations.

Collecting, using and disclosing personal information between related bodies corporate

We will share your personal information with all companies that form a part of Suncorp Group.

Related bodies corporate are permitted under the privacy legislation to collect, use and disclose certain personal information that another related body corporate has collected.

If one Suncorp Group company collects your personal information, other Suncorp Group companies may use and disclose your personal information for the purposes described in *"Why do we need your personal information"* in relation to any products and services they may provide to you. Other companies in the Suncorp Group may also use your personal information for the purposes of providing products and services to other customers (but we will not disclose your personal information to any other customer without your consent).

How do we get your personal information?

If we can, we collect your personal information from you.

You give us your personal information in a number of ways such as completing an application form, requesting a product or service over the phone or Internet, or by visiting a branch in person. We also collect personal information at other times during the course of our relationship with you. This may be when you advise us of a change in contact details, renew your policy, make a claim or seek a variation to the terms of a loan you may have with us.

Do we collect your personal information from third parties?

We may not be able to always collect your personal information from you directly. Sometimes we collect your personal information from other sources. Examples of where we may receive personal information about you from another source and why this may happen are:

- a credit reference about you from a credit reporting agency in the course of assessing your application for a loan;

- your employer and/or the trustee and custodians in the course of establishing and administering your membership of a superannuation fund, managed funds organisations or group life insurance policy;
- an insurance investigator or insurance reference service in the course of assessing your claim under, or request for, a policy of insurance;
- other insurance companies if we need to confirm your insurance history during the course of reviewing an application for insurance, or assessing a claim under a policy;
- a third party or witness in relation to an insurance claim;
- accounting or finance specialists in the course of assessing a claim;
- hospitals, medical and other health professionals in the course of assessing your claim under a policy of insurance, or determining your eligibility for an insurance product;
- your agent, where you have appointed an agent to act on your behalf in dealing with us, such as a broker, legal adviser or other representative such as a friend or family member;
- publicly available sources of information such as telephone directories;
- as required or authorised by law, for example to government agencies, or regulatory bodies for purposes related to public health or safety or the prevention or detection of unlawful activities;
- a third party to whom we have contracted to provide a Suncorp Group financial service or product to our customers;
- where required or authorised under our relationships with our joint venture companies;
- market research organisations for the purpose of product planning, development, customer research or marketing;
- where you have lodged a complaint about a service provided by the Suncorp Group with an external dispute resolution body and the complaint requires investigation with the Financial Ombudsman Service (FOS) and the Superannuation Complaint Tribunals; and
- any external parties to the Suncorp Group where you have asked them to provide your personal information to us.

Do we need your consent to collect, use and disclose your personal information?

The privacy legislation in Australia and New Zealand does not always require us to seek your consent to the collection, use and disclosure of your personal information. However, in compliance with the privacy regimes there are some circumstances where we are required to, or choose to, ask you for your consent.

We may ask for your express consent or infer your consent.

We will obtain your express consent by asking you to:

- provide positive verbal consent such as “Yes” or “I agree”;
- read and sign a consent form; or
- read and sign a document which may also contain a consent request.

We will also respond to your express requests for contact, for example, if you ask us to call you or contact you at a certain pre-arranged time or frequency.

During our business relationship with you and depending on the products and services you choose from the Suncorp Group, we may ask for your express consent on a number of occasions.

We may also infer your consent in certain circumstances. Your consent may be inferred by:

- your conduct with us, such as:
    - continuing your telephone call with us, after you have heard the recorded message telling you the call may be recorded;
    - continuing to speak to a person at a branch or service centre when they are asking you questions;
    - when you send us or provide us with personal information voluntarily; and
- our business relationship with you, such as:
    - you purchasing or acquiring a product or service from us.

Are there any additional requirements we comply with when we contact you or need to obtain consent?

There are a number of other legislative regimes that influence how we deal with your personal information and other information that we collect from you. In Australia, if we telephone you we may have to comply with anti-hawking requirements under the *Corporations Act 2001* (Cth) and the *Do Not Call Register Act 2006* (Cth).

If you are an existing customer of the Suncorp Group and you have placed your telephone number on the Australian Communications and Media Authority's Do Not Call Register, you will still need to contact us directly and advise us if you do not wish to receive direct marketing contact from us.

If we send you electronic commercial messages via e-mail or SMS, we may infer your consent to being contacted in this manner where you e-mail or SMS us your electronic address and you require or ask for a response using that same medium, or when you raise no objection to our advised intended communication with you in this manner. This type of communication is covered under the spam and unsolicited electronic messages legislative regime in Australia and New Zealand.

How do we use and disclose your personal information that we have collected?

We use and disclose your personal information for the purposes for which we collected it.

In Australia, we may use and disclose your personal information for a secondary purpose related to the purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose. In the case of sensitive information, any secondary purpose, use or disclosure will be directly related to the purpose of collection.

In New Zealand, we may use and disclose your personal information for a secondary purpose only if that secondary purpose is directly related to the purpose of collection. We may also use and disclose your personal information to another party in other circumstances in compliance with the privacy regimes in Australia and New Zealand, including where:

- you have given express or inferred consent or authorised us to do so;
- we are required or authorised by law to disclose your personal information, for example, to a court in response to a subpoena or to the Australian Taxation Office, Centrelink, Australian Transaction Reports and Analysis Centre (AUSTRAC) and Ministry of Justice as part of our reporting requirements or a direction issued by the New Zealand Inland Revenue Office.

Do we use and disclose your personal information for research and product development and enhancement purposes?

The Suncorp Group is interested in knowing what sorts of products and services will best meet the needs of our customers. To do this, we need to engage in research and development processes across the Suncorp Group.

This may mean conducting research tasks such as market research or it may mean developing specific customer propositions for our customers by looking at the products you already have purchased from the Suncorp Group.

Where possible and practicable, we will use aggregated or de-identified information to conduct our research and product development. However, sometimes we may need to use personal information to understand how we can improve our products and enhance your experience with us.

We may perform these research tasks in-house, or we may outsource the activity to a third party. If we do outsource to a third party we will ensure they comply with the Australian and/or New Zealand privacy regimes.

Do we use and disclose your personal information for marketing purposes?

We would like to use and disclose your personal information to keep you up to date with the range of products and services available from the Suncorp Group. Generally, our companies in the Suncorp Group will use and disclose your personal information for the Suncorp Group's marketing purposes.

However, the specific company you obtain a product or service from may or may not market Suncorp Group products and services to you. How that company deals with marketing will be detailed in the terms or conditions of their products, their Privacy Statements, the forms you complete or the questions they ask you.

We will not use and disclose sensitive information for the purposes of marketing**.**

How do you tell us you do not want us to use and disclose your personal information for marketing purposes?

If you do not want us to use and disclose your personal information for the purpose of marketing products and services to you, you should contact us and tell us. You can tell us by:

- calling the number provided to you in the information and product documentation you received when you selected your product or service from us;
- emailing the business via their email address available in your product documentation or via our internet site; or
- visiting one of our branches, service centres or places of business.

If you have told us you no longer wish to receive information about a product or service you have acquired from one of our businesses, we will not contact you about any other products or services that one business offers. However, if you have multiple products across different businesses in the Suncorp Group, then you will need to tell each of our businesses that you no longer wish to receive information from them. You can, however, change your mind about receiving information about our products and services at any time - just let us know.

You should be aware that often the law requires us to provide you with certain information about the product or service (product information) you have chosen to receive from us. You will continue to receive this type of information from us even if you have decided not to receive marketing information about our products and services generally.

Who do we usually disclose your personal information to and receive personal information from?

The parties to whom we may disclose your personal information to and receive personal information from will depend on which company in the Suncorp Group you do business with and what product or service you receive from us. Some examples of the parties to whom we may disclose your personal information to and receive personal information from are:

- other companies within the Suncorp Group;
- intermediaries, including your agent, adviser, a broker, a representative acting on your behalf, other Australian Financial Services Licensee or our authorised representatives, advisers and our agents;
- accounting or finance specialists;
- customer research organisations;
- trustees, custodians or employers associated with superannuation and investment, managed funds or group insurance policies;
- government, law enforcement or statutory and regulatory bodies;
- the Financial Ombudsman Service and the Superannuation Complaint Tribunal;
- other insurers, insurance and claims reference agencies, credit agencies loss assessors, financiers or investigative service providers;
- mortgage insurers;
- where required or authorised under our relationships with our joint venture companies;
- legal and other professional advisers;
- hospitals, medical and health professionals;
- debt collection agencies, your guarantors, organisations involved in valuing, surveying or registering a security property, or which otherwise have an interest in such property, purchasers of debt portfolios;
- re-insurers and other organisations involved in our normal business practices; and
- financial institutions, merchants and payment organisations.

The Suncorp Group will only disclose your personal information to and receive personal information from these parties for the purposes we have told you in this Privacy Policy and our Privacy Statements and in compliance with the privacy regimes in Australia and New Zealand. In the course of operating our business and to better understand your needs and improve our financial products and services, we may disclose your personal information to persons who may appear to be unrelated to us or the provision of products and services to you. These people are service providers who assist us in our business and who make the provision of our services and products better.

Many of these service providers work in the background for us and are essential, because they allow us to continue providing you with the level of service you have come to expect from the Suncorp Group. Examples of these types of services and service providers are:

- information technology providers, including hardware and software vendors and consultants such as programmers;
- administration or business management services, including consultancy firms, auditors and business management consultants;
- market research organisations for the purpose of product planning, development, customer research or campaign generation;
- printers and mail service and delivery providers for the mailing of statements, insurance policy documents and marketing material;
- imaging and document management services and
- manufacturers for plastic card production e.g. debit cards.

These service providers provide us with a wide range of back office, administrative, investment and business management services. Where we do disclose your personal information to these service providers we have either entered into contractual arrangements with them to protect your personal information, or they are subject to strict privacy rules and must also comply with our Privacy Policy and the privacy regime. The Suncorp Group will only disclose your personal information to and receive personal information from these service providers, for the purposes we have told you about in this Privacy Policy and our Privacy Statements and in compliance with the applicable privacy regimes.

Do we disclose your information to people overseas?

Our business is trans-Tasman and therefore we will have instances where, for the purposes detailed in our Privacy Policy and our brand Privacy Statements, we may send your personal information to other companies in the Suncorp Group who are in either in Australia or New Zealand.

There are also other instances where we may have to send your personal information overseas or collect personal information from overseas, including countries other than New Zealand. These instances include:

- when you have asked us to do so;
- when we are authorised or required by law to do so;
- when we have outsourced a business activity or function to an overseas service provider with whom we have a contractual arrangement;
- certain electronic transactions; or
- it is necessary in order to facilitate a transaction on your behalf, for example, you are injured or hospitalised overseas and we are completing a travel insurance or assessing a life insurance or personal injury claim on your behalf or remitting funds to an overseas party.

The Suncorp Group will only send your personal information overseas or collect personal information about you from overseas for the purposes we have told you about in this Privacy Policy and our Privacy Statements and in compliance with the privacy regimes in Australia and New Zealand.

What will happen if you do not provide your personal information to us?

If we request personal information about you and you do not provide it, we may not be able to provide you with the financial product or service that you request or manage or pay any claim under an insurance policy.

In addition, if we are required to comply with certain legislation to provide you with the products and services you choose, then collection of certain personal information will be mandatory.

What if you want to be anonymous?

Generally, it is not possible for us to provide you with our products and services unless we have identified you and in some cases, such as when you wish to open a bank account or invest with us or you withdraw funds from your superannuation, the law requires that you identify yourself to us.

If it is lawful and practicable to do so, we may offer you the opportunity to deal with us anonymously. For example, when making an inquiry about current interest rates applicable on term deposits or the type of products or services we offer.

What if you want to know what personal information we hold about you?

You can request access to the personal information we hold about you by contacting us.

If accessing your personal information will take an extended period of time we will inform you of the likely delay. For more detailed requests for access to personal information, for example, access to information held in archives, a fee may be charged to cover the associated cost of retrieval and supplying this information.

If you wish to lodge a request to access your personal information you can contact us by:

- calling the number provided to you in the information and product documentation you received when you selected your product or service from us;
- emailing our business via our email address available in your product documentation or via our internet site; or
- visiting one of our branches, service centres or places of business.

Are we able to deny your request for access to your personal information?

In some circumstances we are able to deny your request for access to personal information. The privacy regimes in Australia and New Zealand outline circumstances under which we may not agree to allow you access to some or all of the personal information that you have requested. The types of circumstances where we may deny you access to personal information include where the:

- request is frivolous or vexatious;
- disclosure may prejudice the prevention, investigation and detection of offences or relate to existing or potential legal proceedings; or
- disclosure would have an unreasonable impact or involve the unwarranted disclosure of the affairs of another individual.

If we deny your request for access we will tell you why.

It is important to note there are a number of reasons which may prevent us from giving you access to your personal information simply because it is not practicable. For example:

- we may not hold any personal information about you;
- you have asked for personal information about someone else and are not authorised to do so;
- we no longer have the personal information you are asking for, as it has been destroyed or de-identified.

Do we keep your personal information up-to-date?

We rely on the accuracy of the personal information we hold about you to efficiently provide our financial products and services to you.

We will take reasonable steps to ensure that any personal information about you which we collect, use or disclose is accurate, complete and up-to-date. This includes taking reasonable steps to correct inaccurate, incomplete or out-of-date personal information, if you have asked us to do so.

If we disagree with your request for correction of your personal information we will attach a statement to the information of the correction that you seek but which has not been made.

Do we keep your personal information secure?

We will take all reasonable steps to protect your personal information from loss, misuse, unauthorised access, modification or disclosure.

We protect your personal information by:

- limiting physical access to our premises to authorised people;
- restricting access to personal information;
- entering into confidentiality agreements with all employees, contractors and third party organisations that may have access to your personal information – but providing access for the purposes we have told you about in our Privacy Policy and Privacy Statements;
- having in place stand-by systems and information backups to deal with major business interruptions;
- maintaining technology security products to prevent unauthorised computer access;
- regularly reviewing and testing our technology in order to improve the level of security;
- destroying or de-identifying your personal information when it is no longer required by law or our record retention policies.

Do we collect your personal information electronically or via the Internet?

If you use our transactional or information web sites and communicate with us via your computer or via sms on your mobile then we may collect your personal information.

Our web sites rely on "cookies" to provide a number of services to you. A cookie is a piece of data that an Internet site sends to your browser and which may then be temporarily stored on your computer. Cookies generally allow the Internet site you are browsing to interact more efficiently with your computer. The cookies we use are non-persistent, meaning that they allow you to be logged in and operate efficiently with our web sites but once you have logged out of your session the cookies are no longer active.

Usually you can set your browser to notify you before you receive a cookie, so that you can decide whether to accept it, however sometimes, if you do not accept a cookie it may affect your use of our web site.

The cookies used by the Suncorp Group are not used to track your specific or personal browsing habits. The Suncorp Group does use these cookies to collect statistical information, such as how many visitors our Internet sites receive and how these users interact with the site, however, the information is specific to the session and where that person went, not who that person is. The Suncorp Group collects and uses this de-identified information to maintain and improve the operation of our Internet sites.

Security of your personal information online

The Suncorp Group maintains industry standard technology and procedures in respect to its information management and provision of online services. The Suncorp Group has an ongoing program of review and enhancement of its security measures. The reviews and updates address such matters as policies, processes and procedures, and technology reviews such as software, virus protection and fire wall settings.

E-mail transmissions, such as sending us an email via Outlook, Outlook Express, Hotmail or Gmail, are not necessarily secure. If you have any concern about the security of the contents of your e-mail or any other transaction over the Internet then you should consider contacting us by other means, such as telephone or visiting a branch or service centre.

The Suncorp Group does however employ encryption techniques and the use of firewalls similar to other financial institutions and internet transaction systems globally. If you make a transaction involving the submission of personal information over the Internet to the Suncorp Group using one of our online forms or via “Secure Messages” then the Suncorp Group employs encryption technology to ensure the security of that personal information transmission. User identifiers, passwords or other access codes may also be used to control access to your personal information.

Once the Suncorp Group has received your personal information, it is stored and protected by a range of security controls, including firewalls, user identification requirements and audit trails. The Suncorp Group’s systems and information technology infrastructure are regularly audited both by internal and external experts and regulatory bodies.

Can you complain about a breach of your privacy?

Yes you can. Please complain to us first. We would like to try and resolve your privacy complaint. If you believe that the Suncorp Group has not protected your personal information as set out in this Privacy Policy you may lodge a complaint with us by:

- calling the number provided to you in the information and product documentation you received when you selected your product or service from us;
- emailing the business via their email address available in your product documentation or via their internet site; or
- visiting one of our branches, service centres or places of business.

If you are a New Zealand customer, please complain by contacting the Privacy Officer. Their contact details are:

New Zealand Privacy Officer
Private Bag 92120
Auckland 1142
New Zealand

What if you are not satisfied with our response to your complaint?

If you are not satisfied with our response you can refer your complaint to the relevant Privacy Commissioner.

In Australia

The Office of the Australian Information Commissioner (OAIC) ensures the proper handling of personal information in accordance with the Privacy Act 1988 (Cth) and other legislation under one of its functions. Complaints to the OAIC must be made in writing.

You can contact the OAIC:

By telephoning:	1300 363 992
By writing to:	Director of Compliance Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW 2001
By visiting the website:	www.oaic.gov.au

In New Zealand

You can contact the Privacy Commissioner:

By telephoning – Auckland – 302 8655
By telephoning – from outside Auckland – 0800 803 909
By writing – Auckland – PO BOX 466 Auckland
By writing – Wellington – PO BOX 10-094 Wellington

Does our Privacy Policy change?

The Suncorp Group reviews its policies, statements and procedures to keep up to date with changes in the law, technology and market practice. As a result we may update and change this Privacy Policy from time to time. If you have a concern or query about this Privacy Policy and how it operates please contact:

Chief Privacy Officer (IPC FI011)
GPO BOX 1453
Brisbane QLD 4001