

# Privacy Policy



This Privacy Policy outlines how Pen Underwriting Pty Ltd ABN 89 113 929 516 AFSL 290518 ('we, our, us') collects, uses and discloses personal information. We handle your personal information with care and in accordance with the Privacy Act 1988 and the Australian Privacy Principles.

## ***What is personal information?***

Personal Information is information or an 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 a material form or not.

## ***What kinds of personal information do we collect and hold?***

The personal information that we collect and hold generally includes your name, address, age or date of birth, qualifications and experience, Australian business number and information specific to the insurance product or service which you apply for or which we provide to you, such as details of your property, insurance and claims history. For some of our products and services, we also collect and hold sensitive information, including information or an opinion about your health or a disability, memberships of professional or trade associations and criminal record.

Where you apply for employment with us, we collect and hold your name, address, contact details, employment history, qualifications and experience, references and names and contact details of your referees. With your prior consent, we may also collect proof of identity and criminal records.

## ***How we collect your personal information***

We collect and hold your personal information in a manner that allows us to assist you now and in the future. We collect your personal information in writing, by email, by facsimile, through information submitted via our online services and verbally in person and by telephone. We generally collect your personal information from your insurance broker. We may also collect your personal information from you, your other agents and representatives, including family members, third parties who you have asked to provide your personal information to us, your employer, third parties claiming under your policy, publicly available sources such as the internet, our claims administrators, claims assessors and investigators, expert witnesses, witnesses, medical service providers, law enforcement officers and statutory and regulatory bodies.

Where you apply for employment with us, we will collect your personal information from you, your agents and your referees.

## ***IP addresses and cookies***

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file. Cookies are small pieces of information which are sent to your browser and stored on your computer's hard drive. By themselves, cookies cannot be used to discover the identity of the user. They help us to improve our website and to deliver a better and more personalised service by storing information about your preferences, speeding up your searches and recognising you when you return to our site. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

## ***Your consent***

By asking us to provide you with insurance and insurance related services, you consent to the collection, use and disclosure (including overseas disclosure) of the personal information you have provided to us for the purposes described in this Privacy Policy.

By applying for employment with us, you consent to the collection, use and disclosure of the personal information you have provided to us for the purposes described in this Privacy Policy.

## ***Personal information about others***

Where you provide personal information about others, you represent to us that you have made them aware that you will do so, the types of third parties we may disclose it to, the purposes we and such third parties use it for, how they can access it and how complaints about privacy may be made. Where you provide sensitive

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information about others, you represent to us that you have obtained their consent on these matters. If you have not and will not do so, you must tell us before you provide the sensitive information.

## ***Why we collect your personal information***

We collect your personal information in order to provide you with insurance and insurance related services, including personal information necessary to consider the risk and assess the appropriate premium, administer the insurance and to assess and pay a claim. Only personal information necessary for the provision of these services and for the conduct of our business will be collected. If you do not consent to provide us with the personal information that we request, or withdraw your consent to the use and disclosure of your personal information at any stage, we may not be able to offer you the products or provide the services that you seek.

From time to time, we may 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 these communications to you.

Where you apply for employment with us, we collect your personal information to enable us to consider your application. If you do not consent to provide us with the personal information that we request, or withdraw your consent to the use and disclosure of your personal information at any stage, we may not be able to consider your application.

## ***Who do we disclose your personal information to and why?***

Your personal information will only be disclosed to third parties where the disclosure is reasonably required to provide you with insurance and insurance related services and to conduct our business. We may disclose your personal information to related entities, insurers, reinsurers, agents and service providers, including anyone we or your insurer has appointed to assist us or your insurer to consider your claim, for example loss adjusters, investigators, lawyers, medical professionals, repairers and suppliers, your employer, other insureds and interested parties under your insurance, external data storage providers, our advisors, statutory and regulatory bodies.

Your personal information may be disclosed overseas. The overseas entities that we may disclose your personal information to are located in the United States of America, United Kingdom, India and Singapore. We regularly review the security of our systems used for sending personal information overseas.

Our insurers and other third parties who are located in Australia may disclose your personal information overseas in accordance with the provisions of their privacy policies.

Where you apply for employment with us, we may disclose your personal information to related companies in Australia, the United States of America, United Kingdom and India and to agents and service providers, and insurers and reinsurers who may be located in Australia, the United Kingdom or Singapore.

## ***How we secure your personal information***

We hold your personal information in our computer systems, data bases and in paper records. Where your personal information has been collected from our agents and service providers, they will also hold copies of your personal information in their computer systems, data bases and in paper records.

We will endeavour to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. We maintain physical security over our paper and electronic data stores and premises by using locks and security systems. We also maintain computer and network security by utilising firewalls, user identifiers and passwords to control access to computer systems where your personal information is stored.

## ***Accuracy of and access to your personal information***

We will take reasonable steps to ensure that your personal information is accurate, up to date, complete and relevant. You are entitled to access your personal information if you wish and request correction if required. If you would like to seek access to or correct your personal information, please contact our Privacy Officer.

## ***Making a complaint***

If you believe that we have interfered with your privacy in our handling of your personal information or that we or our representatives have breached the Australian Privacy Principles, you may lodge a complaint by contacting our Privacy Officer. We will attempt to resolve your complaint in accordance with our Complaints and Disputes Resolution Policy. You can obtain a copy of our Complaints and Disputes Resolution Policy by contacting us or at [www.penunderwriting.com.au](http://www.penunderwriting.com.au)

If you are dissatisfied with our response, you may be able to refer the matter to the Financial Ombudsman Service, subject to its Terms of Reference, or to the Office of the Australian Information Commissioner.

# Privacy Policy



## ***Updating this Privacy Policy***

We may make changes to this Privacy Policy from time to time for any reason. The revised version will be available at our office or on our website.

## ***Contact Details***

### ***Pen Underwriting Privacy Officer***

We welcome your questions and comments about privacy. If you have any concerns or complaints, please contact:

Privacy Officer  
Pen Underwriting  
PO Box 230  
Collins Street West Vic 8007  
Phone: (03) 9810 0600  
Email: [compliance.au@penunderwriting.com](mailto:compliance.au@penunderwriting.com)

### ***Australian Financial Complaints Authority***

GPO Box 3  
Melbourne Vic 3001  
Phone: 1800 931 678 (free call)  
Fax: (03) 9613 6399  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
[www.afca.org.au](http://www.afca.org.au)

### ***Office of the Australian Information Commissioner***

GPO Box 5218  
Sydney NSW 2001  
Phone: 1300 363 992  
Fax: (02) 9284 9666  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
[www.oaic.gov.au](http://www.oaic.gov.au)