



PRIVACY POLICY

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PRIVACY POLICY



Policy Statement

The privacy of your personal information is afforded the highest level of importance by the Codan Group of Companies (**Codan Group**), comprising Codan Limited (ACN 007 590 605) and each of its controlled entities.

The Codan Group is bound by the *Privacy Act 1988* (Cth) (**Act**) regarding the manner in which we handle your personal information, and we will strictly comply with all relevant legislative requirements.

This Privacy Policy sets out our information handling procedures and the rights and obligations that both you and we have in relation to your personal information. In the event of any inconsistency, the legislative requirements will override the provisions of this document.

What kinds of personal information do we collect?

The kinds of personal information that we collect and hold include:

- your contact information, including postal and residential addresses, telephone and facsimile numbers, and email addresses;
- details of the make and model of any product you purchase from us;
- data relating to your activity on our websites via tracking technologies such as cookies;
- details of any survey responses you provide;
- bank account and tax file details; and
- for job applicants or staff, employment history, educational qualifications, reference checks, payroll information and medical information (where relevant).

How do we collect and hold personal information?

We will only collect personal information where it is reasonably necessary to do so for the conduct of our business. Any collection of personal information by us will be fair and lawful and will not be intrusive.

We will collect personal information about you in the following ways:

- if you provide your information by telephone, post, email or facsimile, or in person (such as at industry events and Trade Shows);
- if you contact us via email or submit your information through one of our websites;
- if you purchase products from us, or require us to provide services to you; and/or
- if you enter a competition run by us or on our behalf by a third party service provider.

If it is reasonable and practical to do so, we will collect personal information about you only from you. In the course of operating our business, however, we may collect personal information from third parties such as suppliers, advertisers, mailing lists, recruitment agencies, contractors and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

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When we collect personal information from you, we will take reasonable steps to notify you or ensure you are aware of:

- the Codan Group entity which is collecting your personal information, and their contact details;
- that we have collected your personal information, and whether that collection is required or authorised by law;
- the purposes of collection;
- the consequences if personal information is not collected (such as if this will affect our ability to provide products or services to you);
- our usual disclosures of personal information of the kind collected;
- information about this Privacy Policy; and
- whether we are likely to disclose personal information to overseas recipients, and if practicable, the relevant countries in which they are located.

Some of the above information is included in this Privacy Policy.

How do we hold personal information?

We will hold personal information as either physical records, records on our servers, and in some cases, records on third party servers, which may be located overseas.

We take active steps to hold all hard copy and electronic records of personal information in a secure manner to ensure that they are protected from misuse, interference and loss, and unauthorised access, modification or disclosure.

We have procedures in place to destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

Purposes for which we collect, hold, use and disclose personal information

In general, members of the Codan Group will collect, hold, use and disclose personal information for the purposes of providing or offering goods and services to you.

By providing us with your personal information, you consent to us using and disclosing your personal information for the following purposes:

- providing you with news and information about our products and services;
- sending you marketing and promotional material that we believe you may be interested in, either from any of our related entities or a third party business which we consider may be of interest to you;
- personalising your experience with our products and services, for example, via connectivity with social media services;
- conducting competitions or promotions on behalf of us and selected third parties;
- for job applicants, assessing your eligibility for employment within the Codan Group; and
- disclosing that information to third parties (such as our agents, contractors and suppliers) to undertake the above purposes on our behalf.

You may opt out of receiving marketing and promotional material from the Codan Group at any time by contacting our <Privacy Officer>.

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There may be circumstances in which we are authorised or required by law to use or disclose your personal information. For instance:

- A number of laws require the provision of personal information to third parties, including the *Corporations Act 2001 (Cth)*. The precise information required to be provided will vary depending on the circumstances requiring disclosure of that information.
- We may also use or disclose personal information about you to avoid, lessen or prevent a serious emergency or crime. If we use or disclose personal information about you in those circumstances we will make a written record of such use or disclosure.

We may disclose personal information between our related bodies corporate or to third parties such as our suppliers, organisations that provide us with marketing, technical and support services, or our professional advisors, where permitted by the Privacy Act.

Any disclosure that is required to be made to any third party will be made primarily for the purpose of providing or offering goods and services to you. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

How can you access your personal information?

You have a right to request access to your personal information and to request its correction if it is out of date or incorrect.

You may request access or correction at any time by sending a written request to our **<Privacy Officer>**.

You do not need to provide a reason for your request for access to your personal information. We may charge a small fee for providing access to your personal information if it requires a significant amount of time to locate or collect your information or to present it in an appropriate form. We will not charge you to correct your personal information that we hold in our records.

We will respond to all requests for access to or correction of personal information within a reasonable time.

Please note there may be circumstances in which we are not able to provide you with access to your information, such as where the requested access will have an unreasonable impact upon the privacy of others or where we are required by law to withhold the information. If we are unable to provide you with access to your information, or make the amendments which you have requested, we will provide you with reasons for this decision.

Complaint procedures

If you believe that we may have breached the Australian Privacy Principles, or failed to comply with this policy, you may direct your complaint to our **<Privacy Officer>**.

We take all complaints seriously, and will respond to your complaint within a reasonable period.

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If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

Cross Border Disclosures of Information

We may disclose your personal information to overseas recipients in the following circumstances:

- to any members of the Codan Group that are located overseas (with our offices currently operating out of Australia, Canada, Ireland, China, Malaysia, South Africa, New Zealand, the United Arab Emirates, the United Kingdom and the United States of America);
- to our vendors and/or service providers who provide services to us (including direct marketing services), where such information may be processed and/or stored by our vendors and/or service providers on servers located in the United States of America; and
- any courts, tribunals and regulatory authorities that are based overseas, where disclosure is required by law.

We will take reasonable measures to ensure that such disclosure is in compliance with the requirements of the Privacy Act.

As at the date of this Privacy Policy, the Codan Group is not likely to disclose personal information to other overseas recipients.

By providing your personal information to us, you consent to us disclosing your personal information to the above overseas recipients and agree that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the Australian Privacy Principles, that entity will not be bound by, and you will not be able seek redress under the Act.

If you do not want us to disclose your information to overseas recipients, please let us know.

General

Where practicable, we are required to provide the option for you to deal with us anonymously or under a pseudonym. This option will not be available where we are required or authorised by law to deal with individuals who have identified themselves, or if we need to verify your identity in order to provide products or services to you.

This document reflects our Privacy Policy as at **13 October 2017**. We may amend our Privacy Policy at any time by posting an updated Privacy Policy on our website. The date of this Privacy Policy will inform you as to whether there have been updates since your last visit to our website.

Privacy Officer

Our Privacy Officer can be contacted as follows:
Privacy Officer

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CODAN

Codan Limited
2 Second Avenue
Mawson Lakes SA 5095

Telephone: +618 8305 0311 Facsimile: +618 8305 0411

privacy@codan.com.au