Whitbread

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Strata Essentials Online Insurance Privacy Policy

At Whitbread Associates Pty Ltd trading as Whitbread Insurance Brokers, we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws and how you can access the personal information we hold and how to have that information corrected.

What information do we collect and how do we use it?

When we provide insurance services, including arranging insurance products or distributing insurance products, we collect information required to provide those services. The personal information we collect will depend on the insurance product and the services we provide. It may include your name, contact details, address, date of birth (where required), financial information, property details, and other information relevant to assessing your application, arranging and administering your insurance, and managing any claims. Where required for a particular insurance product, we may also collect sensitive information with your consent or as otherwise permitted by law.

For the Strata Essentials online product, we provide the information you supply to Axis Underwriting Services Pty Ltd ABN 51 090 508 142 (Axis), as the underwriting agency responsible for providing and administering the Strata Essentials product on behalf of insurers, and to other parties involved in providing and administering the insurance product.

This enables Axis to assess your application, determine whether to offer insurance and on what terms, issue and administer the product, and assist with managing any claims.

If you make a claim under your policy, Whitbread Insurance Brokers and Axis underwriting agency acting on behalf of insurers , , may collect additional information relating to your claim. We may also collect information about you from third parties where reasonably necessary to assist with the assessment and management of your claim. This information may be disclosed to Axis and to third parties engaged to assess or administer your claim, such as loss adjusters, assessors, investigators, legal advisers or other specialist service providers. Axis may also disclose this information to its reinsurers where necessary.

From time to time, we may use your contact details to send you information about our products, services, offers, updates and newsletters that may be of interest to you. You may opt out of receiving these communications at any time by contacting us or using the unsubscribe facility provided in our electronic communications.

We may use your personal information for internal business purposes, including improving our products and services, managing our business operations, resolving complaints and responding to enquiries.

What if you don’t provide some information to us?

If you choose not to provide the information we request, we may be unable to process your application, arrange or administer your insurance, or assist with the management of your policy or any claim.

When do we disclose your information overseas?

In some circumstances, your personal information may be disclosed to organisations located outside Australia where this is necessary to arrange, administer or manage your insurance or any claim.

Where your insureris located outside Australia, your personal information may be disclosed to that insurer, or overseas service providers, to enable them to assess your application, administer your policy or manage your claim. Where practicable, we will inform you of the country in which the recipient is located. Where required by

law, we will obtain your consent before disclosing your personal information to an overseas recipient that is not subject to privacy laws substantially similar to the Australian Privacy Principles.

These disclosures may also occur through Axis, acting as the underwriting agency on behalf of insurers.

Australian and overseas insurers may also obtain reinsurance from reinsurance companies located throughout the world. As part of those arrangements, your insurer () may disclose your personal information to its reinsurers for the purpose of assessing risk and administering its reinsurance arrangements These disclosures may be made by Axis, as the underwriting agency acting on behalf of insurers, as part of the underwriting and reinsurance process. Whitbread Insurance Brokers does not make these disclosures directly.

How do we hold and protect your information?

We take reasonable steps to ensure the personal information we hold is accurate, complete, up to date and protected from misuse, interference and loss, as well as unauthorised access, modification or disclosure. We retain personal information only for as long as it is required for the purposes for which it was collected or to meet our legal, regulatory and record retention obligations.

We store personal information securely using our insurance broking, policy administration and client record management systems. Where you apply for insurance through our Strata Essentials online platform, your information may also be stored within systems used to administer the online application and policy. In some cases, records may be archived with secure third-party data storage providers. We take reasonable steps to ensure that our service providers appropriately protect the personal information they hold on our behalf.

Access to personal information is restricted to authorised personnel and service providers who require access to perform their duties. Access is controlled through user authentication, passwords and other appropriate security measures.

We maintain physical, electronic and network security measures to protect the personal information we hold, including secure premises, firewalls, access controls and other technologies designed to safeguard information from unauthorised access, use or disclosure.

Will we disclose the information we collect to anyone?

We do not sell, trade or rent your personal information to third parties.

We may disclose your personal information to Axis, as the underwriting agency acting on behalf of insurers,, intermediaries, claims service providers, contractors and other service providers who assist us in arranging, administering or managing your insurance, processing applications, handling claims, providing technology and payment services, maintaining our systems, or otherwise delivering our services. We take reasonable steps to ensure these organisations protect your personal information in accordance with the Privacy Act 1988 (Cth) and only use it for the purposes for which it was disclosed.

We may also disclose your personal information to another organisation in connection with a corporate transaction, such as a sale, merger, acquisition, reorganisation or transfer of our business.

We may disclose your personal information where required or authorised by law, where you have provided your consent, or where otherwise permitted under the Privacy Act 1988 (Cth).

How can you check, update or change the information we are holding?

You may request access to the personal information we hold about you or request that we correct any personal information that is inaccurate, out of date, incomplete, irrelevant or misleading.

Upon receiving your written request and sufficient information to identify you and the information requested, we will respond to your request in accordance with the Privacy Act 1988 (Cth).

If you wish to access or correct your personal information, please contact our Privacy Officer at:
Whitbread Insurance Brokers, Level 5, 90 Collins Street, Melbourne VIC 3000

In most cases, we do not charge a fee for receiving or processing a request to access or correct your personal information. However, where the information has been archived or the request involves significant administrative effort, we may charge a reasonable fee to recover our costs. We will advise you of any applicable fee before processing your request.

In limited circumstances permitted by the Privacy Act 1988 (Cth), we may refuse to provide access to or correct your personal information. If we do so, we will notify you in writing as soon as practicable, explain the reasons for our decision (unless we are not permitted to do so by law), and advise you of the options available to you.

What happens if you want to complain?

If you have a concern about how we have collected, used, disclosed or handled your personal information, or believe we have not complied with the Privacy Act 1988 (Cth) or this Privacy Policy, please contact our Privacy Officer: Whitbread Insurance Brokers, Level 5, 90 Collins Street, Melbourne VIC 3000

We will acknowledge and consider your complaint through our internal complaints resolution process. We will investigate your concerns and aim to provide you with a response and outcome within 30 days where practicable. If we are unable to respond within this timeframe, we will keep you informed of the progress of your complaint and the reasons for any delay.

Your consent

By providing your personal information to us, including through our online platforms or application processes, you acknowledge and consent to the collection, use and disclosure of your information for the purposes described in this Privacy Policy, including to arrange, administer and manage insurance products, assess applications, process transactions, manage claims and provide related services.

Where required by law, we will obtain your consent before collecting, using or disclosing your personal information.

Website usage Information and analytics

We may use technology to collect information about how individuals access and use our website. This may include information such as your IP address, the date and time of your visit, the pages and links you access, the type of browser and device you use, and other website usage information.

Where this information does not identify you personally, we may use it for statistical purposes, including to analyse website usage, improve the content and functionality of our website, understand customer needs and preferences, monitor website performance, and improve our products and services.

Where information collected through these technologies may be considered personal information, we will handle it in accordance with this Privacy Policy and applicable privacy laws.

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Cookies and similar technologies

We may use cookies and similar technologies to help operate our website, improve functionality, enhance your experience and collect information about how our website is used.

Cookies are small data files stored on your device by your web browser when you visit a website.

Information submitted through our website

Our website allows individuals to submit information through online forms, including enquiry forms, quote requests, online insurance applications and claim-related forms.

Information submitted through these forms is collected for the purpose of responding to your enquiry, assessing and processing online insurance applications, administering policies, assisting with claims, providing requested information, and delivering our insurance services.

Where you submit information through our website, we take reasonable steps to protect your personal information from unauthorised access, use or disclosure. Information provided through online forms may be stored within our systems and may be disclosed to Axis , as the underwriting agency acting on behalf of insurers, claims service providers, technology providers and other parties involved in providing and administering the Strata Essentials insurance product.

We may also use your personal information to provide information about our products and services, manage your ongoing relationship with us, including renewals and policy administration, and conduct activities such as client surveys. You may opt out of receiving marketing communications from us at any time by contacting us or using the unsubscribe facility provided in our electronic communications.

Tell us what you think

We welcome your questions, feedback and comments about privacy. If you have any concerns or complaints about how we collect, use or handle your personal information, please contact our Privacy Officer:
Phone: (03) 8646 0222
Email: info@whitbread.com.au