



Level 1, Unit 5, Charles Street
NORTH PERTH WA 6006
P O Box 624, Mt Hawthorn WA 6915

Ph: (08) 9201 8000 Fax : (08) 9201 8077
Email: info@grangeinsurance.com.au
Website: www.grangeinsurance.com.au

ABN 16 115 775 141, ACN 115 775 141, AFSL 292523

PRIVACY POLICY

Grange Insurance Solutions Pty Ltd (“Grange”) is an Australian financial services (“AFS”) licensee (AFS Licence No. 292523). Grange trades as Grange Insurance Solutions and Grange Education Risk Solutions. This policy applies to Grange Insurance Solutions Pty Ltd and all our representatives. It explains our policy in relation to the collection and management of personal information we collect from individuals. The Privacy Act requires us to handle personal information in accordance with the Australian Privacy Principles.

Collection of information – What is collected and why we collect it.

Personal information means information, or an opinion about, an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. We are an Australian Financial Services Licensee (“**AFSL**”). When we provide you with financial services, we may be required by Corporations Act and regulatory requirements to seek to obtain certain personal information about you, including, but not limited to, your:

- Name, date of birth and contact details.
- Information required to advise you about your insurance needs and management of your risks.
- Information required to organise premium funding arrangements on your behalf.

Sensitive information

We may also need to collect sensitive information if we organise insurance covers for you. Sensitive information includes health information, racial information, genetic information, etc.

We will only collect sensitive information that is reasonably necessary for us to perform our functions or activities in advising you and dealing with you.

Anonymity and pseudonymity

You may choose to deal with us anonymously, or using a pseudonym where it is lawful and practicable to do so.

How is information collected?

We collect personal and sensitive information in a number of ways, including:

- Directly from you such as when you provide the information at meetings, by phone, email, in data collection forms and when you visit our websites. Our website may use "cookies". Cookies are small data files that are downloaded from our website and stored on your computer when you visit our website. Cookies are used to allow us to see which pages and what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to refuse to accept cookies. You can also delete cookies from your computer's hard drive at any time. However, please note that doing so may hinder your access to valuable areas of information within our site.
- Indirectly from insurers and other third parties where you have authorised us to obtain such information or authorised other parties to provide us with this information.

Are you obliged to provide us personal information?

You are not required to provide us the information that we request, or to allow us to collect information from third parties.

However, where you choose not to provide us with the information we request, we may not be able to provide you with services that you have requested from us, and we may elect to terminate our arrangement with you.

Importantly, if you provide either inaccurate or incomplete information to us you risk breaching your duty of disclosure, which may result in a reduced payout by the insurer in the event of a claim or the insurer may avoid the contract from its inception.

What happens if we obtain information about you which we have not solicited?

Where we receive unsolicited personal information about you, we will consider if we could have collected the information if we had solicited the information. Where we determine that we could have collected the personal information from you, we will treat your personal information in the same manner as if we have solicited the information directly from you.

Where we determine that we could not have collected the personal information, we will destroy the information or ensure that the information is de-identified as soon as practicable.

Use of information

We use your personal information for the primary purpose for which the information was obtained. As an AFS licensee, that will typically mean for the purpose of:

- Providing financial services to you.
- Implementing risk management recommendations on your behalf.
- Organising premium funding arrangements on your behalf.

We may also use the information for the secondary purpose of attempting to identify other products and services that may be of interest to you.

Do we disclose personal information for marketing?

We may use your personal information to offer you products and services that we believe may interest you. We may also disclose your personal information to external associates and service providers who assist us to market our products and services.

If you do not want to receive marketing offers from us please inform us. Our contact details are included at the end of this policy.

Disclosure of information

We may disclose your personal information to:

- Our representatives.
- Insurers and premium funders that you have elected to use.
- Our external service providers.

For example, information may be disclosed to the following parties:

- Insurers for the purpose of giving effect to the recommendations made by us. This may include underwriting agencies and reinsurers.
- Premium funders for the purpose of organising a premium funding arrangement on your behalf.
- Other parties involved in the administration of your insurance cover (e.g. actuaries, call centres, mail houses, claims assessors, medical advisers, etc.).
- Our external service providers (e.g. IT providers, professional advisers and contractors).
- Government and regulatory authorities and other organisations, as required or authorised by law.
- Any person considering acquiring, or acquiring, an interest in our business.

Government related identifiers

We do not collect government related identifiers; e.g. tax file number, Medicare number or pension card number.

Cross-border disclosure of personal information

We do not typically disclose your personal information overseas. All our computer database and offices are located in Australia.

We may disclose your information overseas where we seek insurance quotes from an overseas insurer. The information is disclosed for the overseas insurer to determine whether to insure you and on what terms. We will notify you of the country in which the overseas insurer is located. If the insurer is not regulated by privacy laws that are substantially similar to Australia, we will obtain your consent prior to disclosing your information overseas.

Storage and security of information

We store personal information in our computer database and hard copy files. We take reasonable steps to ensure the personal information collected and held by us is protected from misuse, interference, loss, unauthorised access, modification or disclosure. Our computer systems are password protected and accessible by our staff only. Our offices have appropriate security.

In the event you cease to be a client of ours, any personal information which we hold about you will be maintained for a period of not less than 7 years in order to comply with legislative and professional requirements.

Access and correction of information

You may request access to the personal information we hold about you, and we will respond within a reasonable period after the request is made. Where we provide you access to such information, we may charge a reasonable fee to cover our costs. We will disclose the amount of such costs to you prior to providing you with the information.

We will take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, up-to-date, complete and relevant. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate or incomplete, you may contact us to correct the information.

If we disagree about the correction you have supplied, and refuse to correct the personal information, or if we believe that we are unable to comply with your request to access the personal information that you have provided us, we will give you a written notice to that effect. You have a right to make a complaint if you disagree with our decisions in relation to these matters (see below).

Complaints

Should you have a complaint regarding a breach of privacy please contact our Complaints Officer who will handle the matter in accordance with our formal complaints handling procedures. Please address your complaint to our Privacy Officer. Contact details have been included below. Your complaint will be investigated and responded to within 30 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner (OAIC).

We comply with the Notifiable Data Breach obligations imposed by the Privacy Act. We are required to notify you and the Information Commissioner of an eligible data breach. An eligible data breach happens if:

- there is unauthorised access to, unauthorised disclosure of, or loss of, personal information held by us; and
- the access, disclosure or loss is likely to result in serious harm to you.

Complaints to the OAIC must be made in writing. Further information on the complaints process is available for clients wishing to complain regarding a Privacy Breach at www.oaic.gov.au

Policy updates

This policy is subject to change from time to time. The most current version of our Privacy Policy can be obtained from our website (www.grangeinsurance.com.au) or by contacting us.

Contact details

Privacy Officer:	Don Leadbetter
Address:	Level 1, Unit 5, 375 Charles Street, North Perth WA 6017
Postal Address:	PO Box 624, Mt Hawthorn WA 6915
Telephone:	08 9201 8000
Facsimile:	08 9201 8077
E-mail:	info@grangeinsurance.com.au