



# Privacy Policy

## Introduction

At *DavelCorp Insurance Brokers*, we are committed to protecting your privacy in accordance with the *Privacy Act 1988 (Cth)*. This Privacy Policy describes our current policies and practices in relation to the handling and use of personal information. We collect personal information to be able to provide our services as an Insurance Intermediary.

## What personal information we collect

"Personal information" includes:

- information or an opinion – whether true or not, and whether recorded in a material form or not – about an identified living individual or an individual who is reasonably identifiable (e.g. name and contact details); or
- data about an individual who can be identified from that data, or from that data and other information to which we have or are likely to have access.

The information we collect and hold generally includes: your name and contact information (including telephone numbers and email addresses); information relating to the operation of your business; other reference information; and information about other parties that you may conduct, or are interested in conducting, business with.

If you have requested that we act in a broking capacity for insurance-related services, we may also collect and hold other information required to provide such services to you, including details of your previous insurances and sensitive information (such as bank account(s) and criminal records).

You may be able to deal with us without identifying yourself (i.e. anonymously or by using a pseudonym) in certain circumstances, such as when making a general inquiry relating to the services we offer. If you wish to do so, please contact us to find out if this is practicable in your circumstances. However, if you do not provide us with the information that we need, we or any of our third-party service providers may not be able to provide you with the appropriate services.

## How we collect your personal information and where it is stored

We may collect personal information in several ways, including:

- directly from you via our website, telephone, in writing or email; and/or
- indirectly from third parties, if necessary, such as your employer. Steadfast insurance broker members or Steadfast underwriting agencies may also provide us with information about you, for the purpose of obtaining our services. We may also obtain personal information from referees, insurers, premium funders and other third-party service providers – or publicly from available sources.

You authorise us to contact such third parties for the purposes of providing you with the services that you have requested.

We also automatically collect certain information when you visit our website, some of which may provide the capability to identify you. Please see the "Cookies" section below for more details.

We store your personal information that we have collected on our computer network. We do have cloud-based storage for your personal information.

## Why we collect, hold and use your personal information

We collect and hold your personal information for the purposes of providing our services to you and for related purposes. Such purposes include:

- to advise you about your insurance needs and the management of your risks;
- to transact services such as the negotiation of quotations, the placement of new insurances and the negotiation of renewals;
- to provide any information that the insurers or intermediaries – who we ask to quote for your insurance and premium funding – require to enable them to decide whether to insure you and on what terms.
- conducting market or customer research;
- telling you about our other service offerings which we believe may be relevant;
- statutory or regulatory reporting;
- internal or external auditing within our group; and
- any other purpose notified to you at the time your personal information is collected.

If you request information from us via our website, we will collect and retain your email address and any other personal information you may supply. At times we might have to obtain sensitive information about a person's health, driving record and criminal convictions. Insurers might in turn pass on this information to their reinsurers. Some of these companies are located outside Australia.

## Disclosure of your personal information

We will disclose your personal information to:

- our related companies, Steadfast insurance broker members, Steadfast underwriting agencies or third parties who help manage our business and provide our services, including our third-party service providers (such as payment system operators, IT suppliers, lawyers, accountants, other advisers and financial institutions);
- Steadfast Technologies Pty Ltd for the purposes of facilitating transactions through the Steadfast platform or for the purposes of administering or providing the platform to us;
- insurers, reinsurers, other insurance intermediaries, insurance reference bureaus and industry bodies;
- any other entities notified to you at the time of collection;
- courts, law enforcement, regulators and other government agencies to comply with all applicable laws, regulations and rules; or
- requests of courts, law enforcement, regulators and other governmental agencies.

We will not disclose your personal information other than:

- when required or permitted by law;
- as specified in this Privacy Policy; or
- where you have provided your express or implied consent.

When you make a claim under your policy, we assist you by collecting information about your claim. Sometimes we also need to collect information about you from others. We provide this information to your insurer (or anyone your insurer has appointed to assist it to consider your claim, e.g. loss adjusters, medical advisers etc) to enable it to consider your claim. Again, this information may be passed on to reinsurers.

Nothing in this Privacy Policy prevents us from using and disclosing to others de-personalised aggregated data.

### **Your obligations when you provide personal information of others**

You must not provide us with personal information (including any sensitive information) of any other individual (including any of your employees or customers if you are an insurance broker) unless you have the express or implied consent of that individual to do so. If you do provide us with such information about another individual, before doing so:

- you must tell that individual that you will be providing their information to us; and
- warrant that you have that individual's consent to provide their information to us.

*If you have not done the above, you must tell us before you provide any third-party information.*

### **Your obligations when we provide you with personal information**

If we give you, or provide you access to, the personal information of any individual, you must only use it:

- for the purposes we have agreed to; and
- in compliance with applicable Privacy Laws and this Privacy Policy.

You must also ensure that your agents, advisers, employees, and contractors meet the above requirements.

### **Accuracy, access and correction of your personal information**

We take reasonable steps to ensure that your personal information is accurate, complete and up to date whenever we collect, use or disclose it. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

However, we also rely on you to advise us of any changes to your personal information. All personal information identified as being incorrect is updated in our database, and where applicable and appropriate on our website.

Please contact us (cf. *How to contact us* below) as soon as possible when there are any changes to your personal information or if you believe the personal information, we hold about you is either not accurate, complete or up to date.

You can also make a request to access your personal information by contacting us (cf. *How to contact us* below). If you make an access request, we will provide you with access to the personal information we hold about you unless otherwise required or permitted by law. We will notify you of the basis for any denial of access to your personal information.

We may charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. We may also charge the reasonable cost of third parties who assist us in complying with the access request.

### **Security of your personal information**

We take reasonable steps to protect any personal information that we hold from misuse, interference, and loss, and from unauthorised access, alteration and disclosure.

For example, we maintain physical security over our paper and electronic data stores and premises, such as locks and security systems. We also maintain computer and network security. For example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to computer systems.

However, data protection measures are never completely secure and, despite the measures we have put in place, we cannot guarantee the security of your personal information. You must take care to ensure you protect your personal information (for example, by protecting any usernames and passwords). You should notify us as soon as possible if you become aware of any security breaches. We will, where required by applicable Privacy Law, as soon as reasonably possible, notify you of any material security breach concerning your personal information.

## Links to third party sites

Our website may contain links to other third-party websites. We do not endorse or otherwise accept responsibility for the content or privacy practices of those websites or any products or services offered on them. We recommend that you check the privacy policies of these third-party websites to find out how these third parties may collect and deal with your personal information.

## Cookies

Like many website operators, we may use a standard technology called cookies on our website. Cookies are small data files that are downloaded onto your computer when you visit a particular website. Cookies help provide additional functionality to the site and help website operators analyse site usage more accurately. In any cases in which cookies are used on our website, the cookie will not collect personal information except with your consent. You can disable cookies by turning them off in your browser; however, our website may not function properly if you do so.

If you follow a link from our website to another website, please be aware that the owner of the other website will have their own privacy and cookie policies for their site. We recommend you read their policies, as we are not responsible or liable for what happens on their website.

## Direct marketing and how to opt out

When we collect your personal information (e.g. via email, post, SMS or telephone) we may use your personal information to send you: direct marketing communications about our insurance products or our related services; or communications which we believe may be of interest to you, based on the information we have about you. We limit direct marketing to a reasonable and proportionate level. Our processing of your personal data for direct marketing purposes is based on our legitimate interests, but where opt-in consent is required by law, we may seek your consent where applicable.

If you no longer wish to receive such information, or you do not want us to disclose your personal information to any other organisation (including Steadfast insurance broker members or any other related companies), you can opt out by: following the opt-out links in electronic communications; or contacting us using our contact details on the website.

## Administration of personal information

You may refuse or withdraw your consent for the collection, use and/or disclosure of your personal information in our possession by giving us reasonable notice so long as there are no legal or contractual restrictions preventing you from doing so. If you withdraw your consent for us to use your personal information for your insurance matters, this will affect our ability to provide you with the products and services that you asked for or have with us.

If the purpose for which your personal information is collected is no longer served by the retention of such data, or when the retention is no longer necessary for any other legal or business purpose, we will ensure that the hard copy of your personal information will be completely destroyed and electronic personal information will be erased as much as possible.

## Updates of Privacy Policy

We reserve the right to amend our Privacy Policy from time to time to ensure we properly manage and process your personal data. Any amended Privacy Policy will be posted on our website.

## Your consent

By asking us to assist with your insurance needs, you consent to the collection and use of the information you have provided to us for the purposes described above.

## How to make a complaint

If you wish to make a complaint about a breach of this Privacy Policy or any breach of applicable privacy laws, you can contact us using the contact details on our website. You will need to provide us with sufficient details regarding your complaint, together with any supporting evidence and information.

We will refer your complaint to Management who will investigate the issue and determine the steps that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation. We will try to resolve any complaint within a reasonable time frame. If this is not possible, you will be contacted within that time to let you know how long it should take us to resolve your complaint.

If you are not satisfied with our determination, you can contact us to discuss your concerns or you can complain to the relevant local data protection supervisory authority (i.e. the authority for your place of habitual residence, place of work or place of alleged infringement). In Australia, this is the Australian Privacy Commissioner (at [www.oaic.gov.au](http://www.oaic.gov.au)).

## How to contact us

If you wish to gain access to your personal information, want us to correct or update it, have a complaint about a breach of your privacy or any other query relating to our Privacy Policy, please contact our Compliance Officer during business hours in Sydney.

*Contact details:*

*(02) 8814 3888*

*[www.riskybusiness.com.au](http://www.riskybusiness.com.au)*

*Licence No: 277564*

*Unit 52/ 5-7 Inglewood Place*

*Inglewood Business Centre*

*Norwest Business Park*

*Baulkham Hills, NSW 2153*