



VISION
INSURANCE PLACEMENTS

Privacy Policy

Version 1.0 May 2024

VISION INSURANCE PLACEMENTS PTY LTD

WWW.VISINS.COM.AU Level 5, 28 The Esplanade, Perth WA 6000

PRIVACY POLICY

This policy tells you how Vision Insurance Placements Pty Ltd (**Vison**) collects, uses and discloses personal information in accordance with the *Privacy Act 1998* (Cth) and its Australian Privacy Principles (**APPs**). This policy 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.

Personal information is essentially information or an opinion about a living individual whose identity is apparent or can reasonably be ascertained from the information or opinion (e.g. a name and address).

A copy of this Privacy Policy is available via our website www.visins.com.au or you can contact us to request a copy.

WHAT INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

We collect personal information to be able to provide our various services, which may include; insurance broking and underwriting, claims handling, risk management consulting and other forms of insurance services (including underwriting and reinsurance).

We will ask you for the information we need to advise you about your insurance needs and management of your risks. This can include a broad range of information ranging from your name, address, contact details and age to other information about your personal affairs including your assets, personal belongings, financial situation, health and wellbeing.

We collect personal information either directly from the relevant individuals or indirectly from third parties.

For example, an insured may not only provide us with information on themselves for the purpose of obtaining our services but also on other insureds who they represent. We may also obtain personal information from past insurers, witnesses to claims, health care workers and publicly available sources etc.

We will not collect information about you, without your consent, that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or a criminal record. This is subject to some exceptions including where the collection is required by law or when the information is necessary for the establishment, exercise of defence of a legal claim.

We provide any information collected that the insurers or intermediaries who we ask to quote for your insurances and premium funding require to enable them to decide whether to insure you and on what terms, or to fund your premium and on what terms. Those insurers may in turn pass on this information to their reinsurers. Some of these companies are located outside Australia.

For example, if we seek insurance terms from an overseas insurer (e.g. Lloyd's of London), your personal information may be disclosed to the insurer. If this is likely to happen, we inform you of where the insurer is located, if it is possible to do so.

When you make a claim under your policy, we will need to collect information about your claim. Sometimes we also need to collect information about you from others. We provide this information to your insurer (or anyone we or your insurer has appointed to assist in the claims handling and settlement process, e.g. third party claims service providers, loss adjusters, medical brokers etc.) to enable it to consider your claim. Again this information may be passed on to reinsurers.

We also use it to help to develop and identify products and services that may interest clients, conduct market or customer satisfaction research, develop, establish and administer alliances and other arrangements with other organisations in relation to the promotion, administration and use of our respective products and services. 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 this information to you.

WHAT WE EXPECT OF YOU AND THIRD PARTIES WE DEAL WITH

When you provide us with personal information about other individuals, we rely on you to have made them aware that you will or may provide their information to us, the purposes we use it for, the types of third parties we disclose it to and how they can access it (as described in this document). If it is sensitive information we rely on you to have obtained their consent to the above.

If you have not done either of these things, you must tell us before you provide the relevant information.

If we give you personal information, you and your representatives must only use it for the purposes we agreed to. You must meet the requirements of the Australian Privacy Principles set out in the *Privacy Act 1988*, when collecting, using, disclosing and handling personal information on our behalf. You must also ensure that your agents, employees and contractors meet the above requirements.

WHAT IF YOU DON'T PROVIDE SOME INFORMATION TO US?

We can only fully advise you and assist in arranging your insurance or with a claim, if we have all relevant information. The insurance laws also require you to provide your insurers with the information they need in order to be able to decide whether to insure you and on what terms. You have a duty to disclose the information which relevant to the insurer's decision to insure you.

WHEN DO WE DISCLOSE YOUR INFORMATION OVERSEAS?

If you ask us to seek insurance terms and we recommend an overseas insurer, we may be required to disclose the information to the insurer located outside Australia.

For example, we sometimes use the internet to collect and process information. Further, if we recommend a policy provided by Lloyd's of London, your information may be given to the Lloyd's broker and underwriters at Lloyd's of London to make a decision about whether to insure you.

We will tell you at time of advising on your insurance if they are overseas and in which country the insurer is located. If the insurer is not regulated by laws which protect your information in a way that is similar to the Privacy Act, we will seek your consent before disclosing your information to that insurer.

Australian and overseas insurers acquire reinsurance from reinsurance companies that are located throughout the world, so in some cases your information may be disclosed to them for assessment of risks and in order to provide reinsurance to your insurer. We do not make this disclosure, this made by the insurer (if necessary) for the placement for their reinsurance program.

We may also disclose information we collect to the providers of our policy administration and broking systems that help us to provide our products and services to you. These policy administration providers and broking systems may be supported and maintained by organisations in Australia, the UK, EU and/or USA and your information may be disclosed to those organisations. Please note that the Privacy Act and Australian Privacy Principles may not apply to these organisations.

Certain technology service providers that we utilise e.g. email hosting, cloud-based data storage and back up, social media providers, may store information across multiple countries.

HOW DO WE HOLD AND PROTECT YOUR INFORMATION?

We strive to maintain the reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. 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.

We hold the information we collect from you initially in a working file, which when completed is electronically imaged and stored, after which any paper is destroyed in our onsite shredder.

We ensure that your information is safe by protecting it from unauthorised access, modification and disclosure. We maintain physical security over our paper and electronic data and premises, by using 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, passwords and multi-factor authentication to control access to computer systems where your information is stored.

WILL WE DISCLOSE THE INFORMATION WE COLLECT TO ANYONE?

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

We do not use or disclose personal information for any purpose that is unrelated to our services and that you would not reasonably expect (except with your consent). However, we will take reasonable measures to ensure that they protect your information as required under the Privacy Act.

For example, in providing for your insurance needs we may provide information to insurers, reinsurers, other insurance intermediaries, insurance reference bureaus, other advisers such as loss adjusters, lawyers and accountants, contractors and other business service providers including those involved in the claims handling process. We may also disclose information we collect to the providers of our policy administration and broking systems that help us to provide our products and services to you. If applicable, we may also provide it to purchasers of our business and related companies.

We have a duty to maintain the confidentiality of our clients' affairs, including personal information. Our duty of confidentiality applies except where disclosure of your personal information is with your consent or compelled by law.

We may provide your information to others if we are required to do so by law, you consent to the disclosure or under some unusual other circumstances which the Privacy Act permits.

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 CAN YOU CHECK, UPDATE OR CHANGE THE INFORMATION WE ARE HOLDING?

We strive to maintain the reliability, accuracy, completeness and currency of the personal information we hold about you. We review your information regularly however we also request that you update us as soon as possible for changes to your personal information that we hold. We strive to record information in a consistent format, promptly add updated or new personal information to existing records and where necessary, confirm the accuracy of information collected from a third party.

Upon receipt of your written request and sufficient information to allow us to identify the information, we will disclose to you the personal information we hold about you within 30 days. This disclosure may be via copies or a summary of the information as appropriate. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information, please contact us by directing your privacy query to our Privacy Officer at:

Attention: Privacy Officer, Vision Insurance Placements Pty Ltd

Address: L5, 28 The Esplanade, Perth, WA 6000

Email: privacy@visins.com.au Phone: +61 08 9322 4836

We do not charge for receiving a request for access to personal information or for complying with a correction request. Where the information requested is not a straightforward issue and will involve a considerable amount of time, then a charge will need to be confirmed for responding to the request for the information.

In some limited cases, we may need to refuse access to your information, or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

OUR WEBSITE

INFORMATION AND CONTENT

The information provided on our website does not cover all aspects of the law on the relevant subject matter. Professional advice should be sought before any action is taken based upon the matters described and discussed on this site.

To the extent permitted by law, we make no representations about the suitability of the content of this site for any purpose. All content is provided without any warranty of any kind. We disclaim all warranties and conditions with regard to the content, including but not limited to all implied warranties and conditions of fitness for a particular purpose, title and non-infringement.

We will not be liable for any damages or injury caused by, including but not limited to, any failure of performance, error, omission, interruption, defect, delay in operation of transmission, computer virus, or line failure. To the extent permitted by law we will not be liable for any damages or injury, including but not limited to, special or consequential damages that result from the use of, or the inability to use, the materials in this site.

We believe the content of this site to be accurate, complete and current; however there are no warranties as to the accuracy, completeness or currency of the content. It is your responsibility to verify any information before relying on it. The content of this site may include technical inaccuracies or typographical errors.

We reserve the right to modify the content of this site from time to time.

ANONYMOUS DATA

We use technology to collect anonymous information about the use of our website, for example when you browse our website our service provider logs your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our website, to better understand our clients and markets and to improve our services.

COOKIES

In order to collect this anonymous data we may use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. Once you leave the site, the cookie is destroyed and no personal or other information about you is stored.

FORMS

Our Website allows visitors to submit information via Self-Service Contact forms. The information submitted via the Forms is not encrypted. Information collected via on-line forms is sent to our offices via EMAIL (not encrypted) and is also stored on a database which is accessible by Vision staff only (password protected).

We may also use your information to send you requested product information and promotional material and to enable us to manage your ongoing requirements, e.g. renewals, and our relationship with you, e.g. invoicing, client surveys etc. We may use your information internally to help us improve our services and help resolve any problems.

We may occasionally notify you direct marketing about new services and special offers, events or articles we think will be of interest to you. We may send you regular updates by email or by post on insurance matters. If you would rather not receive this information or do not wish to receive it electronically, email or write to us on the contact details listed below.

WHAT HAPPENS IF YOU WANT TO COMPLAIN?

If you have concerns about whether we have complied with the Privacy Act or this privacy Policy when collecting or handling your personal information, please contact our Complaints Officer at:

Attention: Complaints Officer, Vision Insurance Placements Pty Ltd

Address: L5, 28 The Esplanade, Perth. WA 6000

Email: complaints@visins.com.au Phone: +61 08 9322 4836

Your complaint will be considered by us through our Internal Disputes Resolution process. We will acknowledge your complaint within 24 hours and we will respond with a decision within 30 days of you making the complaint. If we need to investigate your complaint and require further time, we will work with you to agree to an appropriate timeframe to investigate. We will provide you with information concerning referring your complaint to the [Office of the Australian Information Commissioner](#) if we cannot resolve your complaint. Further information on our complaints process is set out in our **Complaints Handling Procedures**.