



# INSURANCE PRIVACY POLICY

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## INTRODUCTION TO ONEPATH INSURANCE PRIVACY POLICY

### Protecting your privacy

Protecting your privacy and the confidentiality of your personal information is fundamental to the way we do business.

We handle personal information, including sensitive information, confidentially and in accordance with the *Privacy Act 1988* (Cth) (Privacy Act). We value the ongoing trust you have in us to protect your privacy.

Personal information is information or an opinion about you.

This Privacy Policy applies to OnePath Life Limited and OnePath General Insurance Pty Ltd, referred to collectively in this policy as OnePath ('we', 'us' and 'our').

This Privacy Policy explains how OnePath will manage and protect your personal information, including information that OnePath collects during the course of offering and providing a product or service to you and the information OnePath holds after your product or service is terminated (where we are required to hold this information or it is necessary for our functions). This Privacy Policy also applies to information that OnePath collects from third parties.

This Privacy Policy contains information about how you can access the personal information OnePath holds about you, how you can ask OnePath to correct your personal information and how you can make a complaint if you have concerns about how OnePath has managed your personal information.

OnePath is a member of the Zurich Insurance Group Ltd group of companies. In Australia, we are a subsidiary of Zurich Financial Services Australia Limited (Zurich). Your personal information may be exchanged with Zurich and our other group members to assist with the management and administration of products and services. For further information about Zurich and its privacy policy, including how it may use and disclose personal information, please refer to [zurich.com.au/important-information/privacy](http://zurich.com.au/important-information/privacy).

### How to contact OnePath

If you have any questions or would like more information about this Privacy Policy you may contact the person or department that you normally deal with. Alternatively, you may call OnePath on 133 667 or email us at [insurancefeedback@onepath.com.au](mailto:insurancefeedback@onepath.com.au).

### Our privacy framework

OnePath is bound by the Privacy Act and the Australian Privacy Principles (APPs) set out in that Act. The APPs regulate the way that certain entities handle personal information.

The Privacy Act does not apply to the handling of information that does not relate to individuals – for instance information about corporations.

# COLLECTING YOUR PERSONAL INFORMATION

OnePath collects your personal information so that we can perform our various functions and activities. We also collect your personal information if the law requires us to collect it.

If OnePath does not collect your personal information, we may not be able to deal with you, or provide you with a product or service.

OnePath collects most personal information directly from you. For example, you provide us with your information when you purchase a product or service, fill in an application or claim form, deal with us over the telephone, send us a letter or use our websites.

If you apply for one of OnePath's products, we may collect and hold information from you such as your name, address, telephone number, email address, tax file number (TFN), date of birth, annual income and other financial details, and your place of work.

## Collecting sensitive information

Some information that we collect from you may also be sensitive information.

Sensitive information includes personal information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices or criminal record. Sensitive information also includes genetic information, health information, biometric information that is used for identification or biometric templates.

OnePath may collect health and medical information from you and your medical practitioner with your consent (which may include collection via a third party service provider) to assess your application for life and other types of insurance, to administer your policy and assess any claim made under that policy. OnePath may also collect information about you if your family members apply for certain types of insurance cover.

OnePath may also collect information through customer surveys or questionnaires so that it may obtain your feedback and provide further information to you about OnePath products or services. More information about OnePath's marketing practices can be found below.

## Collecting information from third parties

OnePath may also collect information about you that is publicly available, including information from telephone directories, the electoral roll or other websites.

There may be occasions when OnePath collects personal information about you from a third party. For example, we may collect personal information from:

- medical practitioners, government bodies and service providers where relevant for the purposes of managing or administering our products including assessing your application or claim;
- joint issuers of OnePath products and other organisations including those in an alliance with us, to co-issue, distribute, improve, manage and administer our products and services, carry out business functions and undertake analytics activities;
- organisations that OnePath has an arrangement with to jointly offer products and/or has an alliance with to share information for marketing purposes to provide you with products or services and/or to promote a product or service;
- our related entities, including Zurich and its related entities, so we can better manage your relationship and your products;
- marketing companies if we acquire contact information to tell people about OnePath products and services that may interest them; and
- financial advisers, other parties acting on your behalf and other parties who may have introduced you to OnePath.

OnePath may also collect information about how you use OnePath's and other websites to help us better tailor our services to you. For example, OnePath may do this when you click on a link from a OnePath website or visit a website which displays a OnePath advertisement. Usually, the information we collect in this way is general information only derived from cookies – such as the number of visitors to a site or statistics about how a site is browsed – and does not identify you. If OnePath does identify you with this information (for example, if you have been logged on to an online OnePath service), any use or disclosure of that information will be in accordance with this Privacy Policy.

## Collecting information required by law

OnePath may collect information from you because we are required or authorised by an Australian law or court or tribunal order to collect that information. We will tell you if collection is required or authorised by law and provide you with details of the law, court or tribunal order.

For example, OnePath is authorised by the Superannuation Industry Supervision Act 1993 to request that you provide your TFN. If OnePath collects your TFN, we will handle your TFN in accordance with the Privacy Act and the TFN Rule issued by the Information Commissioner.

OnePath may also be required to ask about your tax residency status under taxation information sharing agreements the Australian Government has in place with other countries.

For example, a tax treaty between Australia and the United States formed under US law (Foreign Account Tax Compliance Act) requires OnePath to ask account holders of some types of products whether they are US citizens or US tax residents when they open their product. If you are a tax resident of another country, the relevant treaty or law may require us to collect your relevant foreign tax identification number.

# USING YOUR PERSONAL INFORMATION

We may use and disclose personal information we collect about you for several purposes including:

- to consider your request for a product or service;
- to enable OnePath to provide a product or service (including the assessment of an application for insurance);
- to tell you about other products and services that may be of interest to you;
- to assist in arrangements with other organisations (such as loyalty partners and alliance partners) in relation to the promotion, marketing or provision of a product or service;
- to manage and improve products and perform other administrative and operational tasks (including risk management, the processing and assessment of claims, systems development and testing, data analytics, staff training and market or customer satisfaction research), including to assist other organisations (such as alliance partners) for these purposes, which may involve disclosure to relevant service providers we contract with;
- to assist our reinsurers and financial advisors provide their services in relation to your product;
- to consider any concerns or complaints you raise against OnePath and/or to manage any legal action between you and OnePath;
- for group related business functions and activities conducted by or with our related entities (such as compliance reporting, information management, claims management and risk management);
- to prevent or investigate any actual or suspected fraud, unlawful activity or misconduct; and
- as required by relevant laws, regulations and codes of practice.

## Who does OnePath share information with?

OnePath collects personal information about you to provide you with our products and services. OnePath will also, where relevant and subject to any consents required under applicable law, disclose your personal information (including in some cases sensitive information) to:

- Other companies in the Zurich Insurance Company Limited Group (the "Zurich Group"). The business activities of the Zurich Group are performed by various business functions which will sometimes require the exchange of information between various Zurich entities.
- Your intermediary, including your professional adviser(s) or any representative or person acting on your behalf or a joint insured on your policy.
- Other insurers or distribution partners as required to carry out activities such as providing insurance or managing a claim.
- Reinsurers for the purposes of reinsuring policies. (For a list of relevant reinsurers and their contact details please contact the Privacy Officer, see below).
- Service providers that assist us in carrying out our business activities, such as, investigators, claims adjusters, claims administrators, surveyors, repairers, builders, engineers, assessors, recovery agents, insurance reference bureaus, accountants, auditors, hospitals or medical professionals, rehabilitation providers, legal advisers, mediators, IT providers, suppliers, professional advisers, image and document management service provider or mailing houses.
- Our business partners, including for example a corporate or alliance partner (such as a company that referred you to OnePath).
- Other third parties as required to carry out activities such as assessing a claim in the event of loss or damage, including financial institutions (who for example issued the credit card under which a claim is made), another party involved in a court action or a claim (such as a third party claimant or witness), Insurance Council of Australia, dispute resolution bodies including the Australian Financial Complaints Authority (AFCA), external administrators (particularly for investment and superannuation products), an employer, the policy owner, other insureds, custodian or trustee (who is associated with a superannuation fund, investment or managed fund or a life insurance policy) and interested parties on a policy (for example a bank or premium funder).
- Government, statutory or regulatory body and law enforcement bodies, such as tax authorities, Centrelink, Work Cover authorities, the RTA, Motor Accident Authority, Roads and Maritime Services or the police.

Information about a third party's use and management of personal information (including any entity they may share information with, how to access or seek correction of information, and how to make a complaint) can be found in the third party's privacy policy.

# DISCLOSING YOUR PERSONAL INFORMATION OVERSEAS

OnePath may need to disclose your information to organisations located overseas.

The most common reason for OnePath disclosing information overseas is because we use service providers to perform a range of functions on our behalf including technology, operational and customer service functions, and some of these service providers are located overseas. We only disclose your information to these organisations when it is necessary for the services they provide OnePath.

Our services providers are located in the following countries:

- Hong Kong
- India
- New Zealand.

OnePath may also use other offshore service providers to help provide you with our products and services or identify ways to improve our service to you.

OnePath may also exchange information with Zurich and its related entities. For a list of countries in which our related

entities may be located, please refer to Zurich's Privacy Policy ([zurich.com.au/important-information/privacy](http://zurich.com.au/important-information/privacy)).

If you have an interaction with one of our Customer Service Teams, OnePath may send you an automated follow up request for your feedback on your experience(s). OnePath uses external service providers based in the USA, Canada and the UK to help us send you the automated request and to analyse responses. We will therefore need to send your information to these locations.

When we disclose your information overseas, we are required to take measures to ensure your information is treated in accordance with the standards that apply in Australia except in rare cases (for example, where we are required by law to disclose your information overseas) or where we obtain your consent not to take these measures

The above is not a complete list of the countries to which your information may be disclosed when using a OnePath product or service. In some circumstances, the nature of the product or service you request may require OnePath to disclose your information overseas and the countries to which we may disclose your information will depend on the particular circumstances.

## How does OnePath use cookies & digital tools?

A cookie is a small, text-based file used frequently on some websites and portals. They can be permanently stored on your hard drive (persistent cookie) or in your computer's memory (session cookie).

OnePath uses session cookies to interact with your browser. They are designed to assist and streamline the exchange of information between your computer's browser and our computer systems. For example, a session cookie is created after you log in with your user name and password and your access is authenticated. The session cookies assists in validating that OnePath's computer is communicating with your web browser throughout the time you access the website during the session. When you end the session by logging off or closing the browser, the session cookie is rendered inoperable.

Other cookies used by OnePath collect information about the use of OnePath's website. The information collected includes where visitors connect from, what version of browser they use and their path through the site. In some circumstances, cookies can also provide information to identify a person. It helps us to provide personalised features and to meet online expectations of our clients, to improve our services and products, as well as keep our content fresh and relevant.

When you apply for an insurance policy using our website or our online application forms, OnePath collects personal information about you as a part of your application. Once you submit your application online, OnePath may use cookies, which in this case may personally identify you through your application information, to identify traffic source, to improve our website and your customer experience, as well as to keep our content fresh and relevant.

OnePath may also use third party remarketing cookies e.g. through Google AdWords, LinkedIn Insight Tag and Facebook Ads. These cookies allow us to display tailored advertising to you on different websites across the internet and on social media platforms based on your prior visits to our site. OnePath and some of these third parties may also use the information to optimise ad selection for groups of individuals based on age, gender, interests and past visits to sites. Importantly, we do not collect any identifiable information about you through this remarketing process nor combine the anonymous information with personally identifiable information. You can opt out by managing your settings on such third party sites:



Alternatively, you can opt out of a third party vendor's use of cookies by visiting the **Network Advertising Initiative opt-out page**.

The use of cookies however, is ultimately governed by you, as you can choose if and how a cookie can operate by configuring certain preferences and options in your browser. They need to be enabled if you wish to use the secure log in services here. Choosing to disable cookies may mean you are not able to access all features of the site including the secure log in services.

We utilise web analytics reporting software to report and measure traffic patterns to, from and within this website. The tracking technology collects various information, such as the visitor's domain name and IP address, which pages are visited, the number of unique visitors, paths taken within the website, duration of visits and entry/exit points to the website. A User ID may be assigned to an individual user to track engagement from one or more sessions initiated from one or more devices.

We use the aggregated reporting provided by web analytics to better manage, analyse and develop our websites, as well as to improve customer experience and improve our services and products.

When you apply for an insurance policy using our website or our online application forms, OnePath collects personal information about you as a part of your application. OnePath may use web analytics reporting software with this data to help us improve the services we provide. All personal information collected and held will be in accordance with this Privacy Policy.

## YOUR CONSENT IS IMPORTANT

OnePath may require your consent to use and/or disclose your information in particular ways.

For instance, we need your consent if we need to use your information for a purpose that is not related to the purpose for which we collected your information in the first place.

Depending on the circumstances, this consent may be expressed (for example, you expressly agree to the specific use of your information by ticking a box) or implied by some action you take or do not take (for example, your agreement is implied by the fact that you have agreed to your product terms and conditions which contains information about the use or disclosure).

## MARKETING AND PRIVACY

As part of our service to you, we may use personal information (including sensitive information) we have collected about you to identify a product or service that may benefit you. We may contact you from time to time to let you know about new

or existing products or services. We may also disclose your personal information to our related entities or other third parties with whom OnePath is in an alliance for marketing purposes.

OnePath, our related entities, and OnePath's alliance partners, or alliance partners of our related entities, may send you information about new or existing products and services from time to time.

To opt out of receiving this information from OnePath, you must call 133 667, email [customer.risk@onepath.com.au](mailto:customer.risk@onepath.com.au), or alternatively, contact the party that sent you the

communication directly by following the opt-out or unsubscribe process in that communication.

## MANAGING YOUR PERSONAL INFORMATION

### OnePath protects your information

OnePath protects your personal information from misuse and loss. We also protect it from unauthorised access, modification and disclosure by ensuring that your personal information can only be accessed by people properly authorised to have access.

OnePath may store your personal information in hard copy documents or electronically. OnePath maintains physical security, such as locks and security systems, over our paper and electronic data stores and premises. OnePath also maintains computer and network security. For example, OnePath uses firewalls (security measures for the internet) and other security measures such as identification codes and passwords to control access to computer systems. OnePath continually maintains and monitors its online security systems to ensure that OnePath's online services are secure and that your personal information is appropriately protected when you use these services.

### Protecting your privacy

You can help us to protect your privacy by observing our security requirements and contacting us immediately if your contact details change.

We require you to keep your passwords and access codes confidential and secure at all times. This means that you should not disclose your passwords or access codes to any other person. You should contact OnePath immediately if you believe that your passwords or access codes may have been disclosed to another person or if you would like to change your password.

## HOW DO I ACCESS MY PERSONAL INFORMATION?

Subject to some exceptions, you can find out what personal information OnePath holds about you.

You should contact OnePath if you wish to find out about the personal information a OnePath company holds about you. We will need to verify your identity before giving you access.

We will normally be able to deal with your request immediately. If the request is complex, we will ask you to complete a personal information request form. We can usually deal with such a request within 14 to 30 days.

Depending on the complexity of your request, we may charge a fee for processing the request. Please refer to our fees and charges booklets for our standard fees and charges.

OnePath will usually provide access to your information at the office closest to you in order to protect the confidentiality and security of your information. However, you may elect to receive your information by registered mail, courier, or electronically where practicable.

In certain circumstances, OnePath may not be able to tell you what personal information is held about you. In these circumstances, we will write to you to explain why we cannot provide you with the information and attempt to find alternative means to enable you to access your information.

## HOW DO I REQUEST CORRECTION OF MY INFORMATION?

If you believe that the personal information we hold is inaccurate, incomplete or out of date, you should contact us.

We will promptly update any personal information that is inaccurate, incomplete or out of date. If we do not agree that your information is inaccurate, incomplete or out of date, we will write to you and tell you the reason(s) why we do not agree with you. We will also tell you what you can do if you are not satisfied with our response.

## RESOLVING YOUR CONCERNS

You are entitled to complain if you believe that your privacy has been compromised or that OnePath has breached the Privacy Act.

If you have a privacy complaint, you can contact the person or OnePath company department that you have been dealing with. Alternatively, you can lodge a complaint online, via phone or in writing – visit OnePath's complaints page here for details at: <https://www.onepathinsurance.com.au/about-us/complaints.html>.

### Managing your complaint

OnePath will confirm that we have received your complaint within 1 business day (or as soon as practicable) and work with you to provide an outcome as quickly as possible. If we need more than 5 days to review and resolve your concerns, we will refer you to our Dispute Resolution Team who will undertake further investigations. Your dedicated contact will keep you regularly updated with the process and will work with you to discuss options to resolve your complaint.

Once we have come to a decision on the outcome of your complaint, we will discuss the proposed outcome with you.

We will write to you, where required, and our response will outline the outcome of your complaint. In most instances, our complaints decision will be provided no later than 30 calendar days where your complaint relates to a life insurance policy, or 45 calendar days if it relates to a superannuation product. Where we cannot resolve your complaint within this timeframe, we will advise you in writing.

If your complaint is not satisfactorily resolved, you may access an external dispute resolution service such as the Australian Financial Complaints Authority (AFCA) or apply to the Office of the Australian Information Commissioner (OAIC) to have the complaint heard and determined. When we write to you about our decision, we will explain how you may access AFCA or make a complaint to the OAIC.