



## **Privacy Policy**

Sterling Insurance Pty Limited (“Sterling”) values your privacy and is committed to protecting the privacy of your personal information. We are bound by the Privacy Act 1988 (Cth), the Privacy Act 1993 (in New Zealand) and the applicable privacy principles. This privacy policy sets out how we collect, store, use and disclose your personal information (including sensitive information).

### **Who are we?**

Sterling provides insurance underwriting and broking services to the Australian market and assesses claims made against those insurance policies. Sterling Insurance Pty Limited trades under ABN 12 084 296 168 AFSL 237880

### **What is “personal information”?**

Personal information is information or an opinion that can identify you or from which your identity can be reasonably ascertained. The Principles apply only to personal information, and not to general or commercial information regarding a company or organisation.

### **What is “sensitive information”?**

This is a particular kind of personal information and includes information about an individual’s health, racial or ethnic origins, membership of political or professional or trade association/s, political opinions or philosophical or religious beliefs, criminal record, or sexual preferences. We will only collect, use or disclose sensitive information about you as is allowed by law, where we have received your consent to do so or the collection is necessary for the establishment, exercise or defence of a legal claim by or against us.

### **Why do we collect your personal information?**

We may directly or indirectly collect this information to enable us to provide our clients with financial services, financial products (including arranging insurance or reinsurance), assessing insurance claims, or other tasks related to our business activities.

If you do not provide us with this information, we will not be in a position to do business with your insurance adviser or you (e.g. to verify your claim and make a payment to you under a Sterling Insurance policy).



## **How do we collect your personal information?**

Where possible, we collect your personal information directly from you. In most instances, collection will take place when you complete a proposal form or claim form and submit it to us. However, we may be required to collect personal information about you from other sources from time to time.

We shall employ all reasonable endeavours in order to obtain your express consent prior to our collection, use or disclosure of your personal information.

## **How do we use your personal information?**

We will use your personal information in order to properly insure your interest, to decide whether or not your claim falls within the parameters of the Sterling insurance policy, to assess a claim made by you under a Sterling insurance policy, or to determine the amount of any claim payments to be made to you under a Sterling insurance policy.

## **Do we disclose your personal information to anyone else?**

We may disclose your personal information to;

- Insurers, reinsurers and insurance intermediaries;
- An investigator, assessor, State or Federal Health Authorities, lawyers, accountants, medical practitioners, hospitals or other professional advisors (for the purpose of investigating or assessing your claim);
- A lawyer or recovery agent (for the purpose of defending an action by a third party against you or for the purpose of recovery costs including your excess);
- Contractors who supply services to us (e.g. to handle mailings on our behalf)
- An immediate family member
- Other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event.

Any one of the above could be operating within or outside of Australia.

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 sensitive information) of any other individual (including any of your employees or clients if you are a broker) unless you have the express 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 that we will handle their information in accordance with this privacy policy;
- Must provide that individual with a copy of (or refer them to) this privacy policy; and
- Warrant that you have that individual's consent to provide their information to us.

If you have not done this, 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 purpose we have agreed to; and
- In compliance with applicable privacy laws, including the privacy principles set out in the Privacy Act 1988 (Cth) or, in New Zealand, the Privacy Act 1993, and this privacy policy.

## **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. 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.



## **Is your personal information secure?**

The protection of your personal information is very important to Sterling. As a result, we take all reasonable precautions to safeguard your personal information from loss, misuse, unauthorised access, modification or disclosure. We employ a number of means to protect your personal information including;

- External and internal premises security
- Restricted access to personal information
- Entering into confidentiality agreements with employees, contractors and third party organisations; and
- Maintaining technology (including encryption and firewalls) to prevent unauthorised computer access.

Sterling may be required by law to retain your personal information for a period of time after you have ceased your relationship with us. After the required time has passed, it is our practice to destroy or delete your personal information from our systems in a secure manner.

## **Can you access the personal information we hold about you?**

You may request access to any of the personal information we hold about you. In most cases, a summary of personal information such as your name and address details, contact telephone numbers and policy cover are freely available to you by calling the Privacy Officer. For more detailed requests (e.g. access to personal information held in off-site archives), a fee may be charged to cover the cost of retrieval and the supply of this information to you.

All requests for access to personal information will be handled as quickly as possible and we shall endeavour to process any request for access within thirty (30) days of having received the request.

## **Can your request for access to your personal information be denied?**

We are not always required to provide you with access to your personal information upon your request. We may refuse you access to personal information in a number of circumstances such as where the information may relate to existing or anticipated legal proceedings with you, where denying access is required or authorised by law or where the request for access is regarded as frivolous or vexatious. If we deny your



request for access to or refuse your request to correct your personal information, we will provide you with reasons for doing so.

### **Do you have to be identified at all?**

Generally speaking, it is not possible for us to do business with you (e.g. assess your claim under a Sterling insurance policy) unless we have identified you. Wherever it is lawful and practicable to do so, we may offer you the opportunity to deal with us anonymously.

### **Internet and Electronic Mail (“email”)**

Whilst the Internet has brought many improvements to the way we are able to do business with you, we also understand that you may have concerns about the personal information collected about you online or the security of your personal information that may be exchanged between us online.

Our website ([www.sterlinginsurance.com.au](http://www.sterlinginsurance.com.au)) relies on “cookies” to record limited information, including the Internet Protocol address of the computer you use to access our website and the pages you request within our website. A cookie is a piece of data that a website can send to your browser, which may then be stored on your computer. Cookies generally allow the website to interact more efficiently with your computer.

Whilst we acknowledge that emails are a convenient and efficient forum for the transfer of information, we do not consider email to be a secure form of communication. Therefore, we discourage you from sending your personal information to us via email.

### **Changes to our Privacy Policy**

Sterling will review all of its policies and procedures to ensure that they are updated in line with changes in the law, technology and market practice. As a result we may change this privacy policy from time to time.

*This Privacy Policy was last amended on 31<sup>st</sup> March 2017.*



## Contact Information

If you have a question about this Privacy Policy, if you wish to lodge a request to access your personal information or if you believe that Sterling has not protected your personal information as set out in this privacy policy and wish to make a complaint, please contact our Privacy Officer at the details below;

Telephone: (02) 9950-4000

Mail: Privacy Officer  
Sterling Insurance Pty Limited  
P.O. Box 286  
NORTH SYDNEY NSW 2059

If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via [www.oaic.gov.au](http://www.oaic.gov.au) or the New Zealand Privacy Commission, in New Zealand via [www.privacy.org.nz](http://www.privacy.org.nz)