

Suncorp Group Privacy Policy

The Suncorp Group

Suncorp Group is the name we use to describe ourselves. Suncorp Group Limited is the owner of a group of companies that offer a range of financial products and services in banking, general insurance, life insurance, superannuation and investment products across Australia and New Zealand. The companies in our corporate group collect, hold, use and disclose your personal information in a number of different ways. To find a list of our brands/companies, please click [here](#).

We are committed to ensuring that your personal information is protected.

Our Privacy Policy

Our Privacy Policy provides you with general information about how the companies in Suncorp Group manage your personal information. When you purchase or acquire a product or service from us you will receive further information about our privacy practices in a privacy statement or other form of privacy disclosure (“**Privacy Statement**”). The Privacy Statement will give you specific information about how we will manage the personal information for the particular product or service and/or the particular company/brand. Depending on how you interact with us, a Privacy Statement will be delivered to you in a number of ways, including hard copy/paper or electronic copies.

We also have *Online Terms* which detail your use of our websites and other online interactions. Please refer to those terms at the bottom of each company website prior to using the services our websites offer, or when you are directed to do so such as during the acquisition of a product or service.

The type of personal information we collect and hold

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable. It includes sensitive information. We will ask for a broad range of personal information which is necessary for our functions or activities. The type of personal information we ask for will depend on which of the companies in Suncorp Group you do business with and the type of product or service you choose.

We will generally ask for the following types of personal information:

- name, address and contact details;
- date of birth;
- gender; and/or
- information about your use of our product or service.

Depending on the product or service you choose, you may also be asked other types of personal information such as:

- insurance/financial/credit/bankruptcy history;
- employment information;
- marital status/family details or circumstance;
- pastime information;
- tax file number;
- details about the risk you want to insure (e.g. home, contents, holiday, car, business); and/or
- any other personal information which is either required to acquire a product or service or needed during the lifecycle of that product or service.

We may also collect sensitive information such as information or opinion about your:

- health;
- racial or ethnic origin;
- sexual preferences or practices;
- membership of a political, professional or trade association (or union);
- religious beliefs or affiliations; and/or
- criminal history.

If we are not able to collect personal information about you we may not be able to provide you with the products, services or assistance you require. The collection, use or disclosure of your personal information is needed to provide these.

Ways we collect your personal information

We collect your personal information:

- by using written forms;
- through contact over the telephone, your mobile or other messaging technology;
- via the internet, including websites and social media; and/or
- in person to person contact (e.g.: meetings or providing products and services through branches, offices or service centres).

We will collect your personal information during the information life cycle, on an adhoc or a recurrent basis using the above methods. For example, we will collect personal information when you acquire a product or service from us, when you make changes to that product, when you make a claim or exercise a right under the product or service or when you need to complain. We will combine or link personal information we already know about you to other personal information we collect about you.

We collect your personal information:

- directly from you;
- from publicly available sources of information; and/or
- from other persons or organisations (including related and third parties).

Please refer to "*Parties to whom we disclose and collect your personal information*" section which details the types of organisations we disclose your personal information to and collect your personal information from.

Cookies

Our websites rely on "cookies" to provide a number of services to you. A cookie is a piece of data that a website sends to your browser and which is then stored on your computer or other internet enabled device. Cookies are generally one of two types, a session cookie or a persistent cookie. A session cookie is a temporary cookie that is placed on the device and remains until you leave one of our websites. A persistent cookie will remain on your device for a period of time or duration specified in the cookie despite you leaving our websites.

Cookies generally allow our websites you are browsing to interact more efficiently with your device. Suncorp Group uses cookies to collect and use information for a range of purposes, including; to maintain and improve the operation of our websites; track user preferences and product requirements to customise our websites and target and improve advertising or marketing relevance. We may also have an arrangement with third parties who may use our cookies to improve the relevance of our advertising to you on third party websites. You are able to use your browser settings to manage cookies. These settings may include deleting all or some cookies, not accepting any cookies or being notified when cookies are being used. Sometimes if you decide not to allow or accept a cookie, it may affect your use or the functionality of our websites. Please see our *Online Terms* found on our websites for more information.

Purposes of collection of personal information

We collect your personal information so we can:

- identify you and conduct appropriate checks;
- understand your requirements and provide you with a product or service;
- set up, administer and manage our products and services, including the management and administration of underwriting and claims, and obtaining loan assessments and credit reports;
- assess and investigate a claim made by you under one or more of our products;
- manage, train and develop our employees and representatives;
- manage complaints and disputes, and report to dispute resolution bodies; and

- get a better understanding of you, your needs, your behaviours and how you interact with us, so we can engage in product and service research, development and business strategy including managing the delivery of our services and products via the ways we communicate with you.

Sometimes we are required to collect your personal information to satisfy specific legal obligations. The Privacy Statement you receive will give you further details as to which laws may apply to your personal information. Your Privacy Statement may also contain different primary purposes of collection depending on the product or service you acquire from us, the interaction you have with us or the company or brand in the Suncorp Group you do business with.

Collecting, using and disclosing personal information between companies in the Suncorp Group

If your personal information is subject to the Australian privacy regime, we will share your personal information with all companies that form a part of Suncorp Group. If one Suncorp Group company collects your personal information, other Suncorp Group companies may use and disclose your personal information for the purposes described in “*Purposes of collection of personal information*” section in relation to any products and services they may provide to you. Other companies in the Suncorp Group may also use your personal information for the purposes of providing products and services to other customers (but we will not disclose your personal information to any other customer without your consent).

If your personal information is subject to the New Zealand privacy regime we will only share your personal information with other companies in the Suncorp Group where we are authorised to do so by the Privacy Act 1993.

Use and disclosure

We use and disclose your personal information for the purposes we collected it. Please refer to “*Purposes of collection of personal information*” section to understand what these purposes may be.

If your personal information is subject to the Australian privacy regime, we will use and disclose your personal information for a secondary purpose related to a purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose. In the case of sensitive information, any secondary use or disclosure will be directly related to the purpose of collection. If your personal information is subject to the New Zealand privacy regime, we will use and disclose your personal information for a secondary purpose only if that secondary purpose is directly related to a purpose of collection.

For example, we will disclose your personal information to third party service providers so that they can provide the contracted services to Suncorp Group such as information technology support or programming, hosting services, telephony services, mailing or sending of documentation to customers digitally or otherwise.

There will be other instances when we may use and disclose your personal information in accordance with the Australian and New Zealand privacy regimes including where:

- you have expressly or impliedly consented to the use or disclosure;
- we reasonably believe that the use or disclosure is reasonably necessary for an enforcement activity conducted by or on behalf of an enforcement body; or
- we are required or authorised by law to disclose your personal information, for example, to a court in response to a subpoena or to the Australian Taxation Office, Centrelink, Australian Transaction Reports and Analysis Centre (AUSTRAC) and Ministry of Justice as part of our reporting requirements or a direction issued by the New Zealand Inland Revenue Office.

Collection use and disclosure of personal information for marketing

Suncorp Group has a large range of financial products and services. Marketing is an important part of our business. We want to collect, use and disclose your personal information to keep you up to date with the range of products and services available from Suncorp Group and which we think may be of interest to you. We use a wide variety of marketing strategies including mail, sms, telephone and other internet based marketing including targeted online advertising and online behavioural marketing. Third party marketing service providers may combine the personal information we disclose to them with information they already hold about you, in order to serve you with more relevant advertising about our products and services.

Refer to your relevant Privacy Statement or privacy disclosure as to how our companies will deal with your personal information for the purpose of marketing. We want you to be able to exercise your marketing preferences. Details of how to exercise your preferences will be detailed in those statements and via our customer and non-customer contact points.

Parties to whom we disclose and collect your personal information

As detailed in “*Ways we collect your personal information*” section there are a range of people and organisations (**‘parties’**) to whom we disclose your personal information and collect personal information from – that are not you. These may be parties related to Suncorp Group or third parties. The particular party will depend on which company or brand in Suncorp Group you do business with and what product or service you receive.

Some examples of the parties to whom we may disclose your personal information to and collect personal information from are:

- other companies within the Suncorp Group and other trading divisions or departments within the same company (to see a list of our brands/companies, please click [here](#));
- any of our Group joint ventures where authorised or required;
- customer, product, business or strategic research and development organisations;
- a third party with whom we have contracted to provide financial services/product, administrative or other business services – for example:
 - information technology providers,
 - administration or business management services, consultancy firms, auditors and business management consultants;
 - marketing agencies and other marketing service providers;
 - claims management service providers;
 - print/mail/digital service providers; and
 - imaging and document management services
- data warehouses, strategic learning organisations, data partners, analytic consultants;
- social media and other virtual communities and networks where people create, share or exchange information;
- publicly available sources of information;
- clubs, associations, member loyalty or rewards program providers and other industry relevant organisations;
- any intermediaries, including your agent, adviser, a broker, a representative or person acting on your behalf, other Australian Financial Services Licensees or our authorised representatives, advisers and our agents;
- a third party claimant or witnesses in a claim;
- accounting or finance professionals and advisers;
- an employer, trustee or custodian associated with membership of a superannuation fund, investment/managed fund or life insurance policy;
- government, statutory or regulatory bodies and enforcement bodies;
- policy or product holders or others who are authorized or noted on the policy as having a legal interest, including where you are an insured person but not the policy or product holder;
- in the case of a relationship with a corporate partner such as a bank or a credit union, the corporate partner and any new incoming insurer;
- the Financial Ombudsman Service and the Superannuation Complaints Tribunal or any other dispute resolution body;
- other insurers, insurance investigators and claims or insurance reference services, loss assessors;
- credit reporting agencies;
- legal and any other professional advisers or consultants;
- hospitals, medical/ health or wellbeing professionals;
- debt collection agencies, your guarantors, organisations involved in valuing, surveying or registering a security property, or which otherwise have an interest in such property, purchasers of debt portfolios; and
- any other organisation or person where you have asked them to provide your personal information to us or asked us to obtain personal information from them, (e.g. your parent).

Overseas disclosure

We will send your personal information overseas and collect personal information from overseas. Instances when we will do this include:

- when you have asked us to do so or we have your consent;
- when we are authorised or required by an Australian or New Zealand law or a court/tribunal to do so;
- when we have outsourced a business activity or function to an overseas service provider; and
- certain electronic transactions.

We will disclose all kinds of personal information overseas but only to the extent it is necessary to perform our functions or activities. In order to engage in our business activities and functions we will disclose your personal information to and collect your personal information from parties in a number of countries. Please click [here](#) to see a list of countries in which those parties are likely to be located. We will need to from time to time disclose your personal information to and collect your personal information from other countries not on this list. This will be on an adhoc or case by case basis and for the purposes for which we collected your personal information.

Security of your personal information

We hold your personal information in:

- computer systems;
- electronic databases;
- digital records;
- telephone recordings; and
- in hard copy or paper files.

These storage mechanisms may be managed in a number of ways. They may be managed or administered internally by a company in Suncorp Group and may be held locally in Australia or in New Zealand. Or they could be managed by a third party storage provider with whom Suncorp Group has a contractual relationship and be either managed locally and/or overseas.

We will take all reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. The ways we do this include:

- limiting physical access to our premises;
- restricting electronic and physical access to personal information we hold;
- having in place stand-by systems and information backups to deal with major business interruptions;
- maintaining technology security products;
- requiring any third party providers to have acceptable security measures to keep your personal information secure; and
- destroying or de-identifying personal information pursuant to the law and our record retention policies.

We maintain industry standard technology and procedures in respect of our information management and provision of online services. Suncorp Group has an ongoing program of review and enhancement of its security measures. The reviews and updates address such matters as security and information management policies, processes and procedures, and technology reviews such as software, virus protection and fire wall settings. Suncorp Group's systems and information technology infrastructure are regularly audited both by internal and external experts and regulatory bodies as required.

E-mail transmissions to Suncorp Group, are not necessarily secure. If you have any concern about the security of the contents of your e-mail or any other transaction over the Internet then you should consider contacting us by other means. Suncorp Group does however employ strong encryption techniques and the use of firewalls similar to other financial institutions and internet transaction systems globally. If you make a transaction involving the submission of personal information over the Internet to Suncorp Group using one of our online forms then the Suncorp Group employs that encryption technology. Once Suncorp Group has received your personal information, it is stored and protected by a range of security controls, including firewalls, user identification requirements and audit trails.

Suncorp Group trains its employees and representatives in their privacy obligations, applies confidentiality obligations and provides authorised persons with user identifiers, passwords or other access codes to control access to your personal information.

Non-customers

You may not be a customer of ours but you may interact with one of our companies. You could be a claimant under our insured's policy, a witness in an accident or a spouse or family member of a customer. You may also interact with one of our companies by using our transactional websites, entering a competition or commenting via social media. We will collect, use and disclose your personal information in accordance with this Privacy Policy and any Privacy Statement you may receive when you interact with us. Please see our *Online Terms* found on all our transactional websites for more information about interacting with us via the Internet.

Anonymity and Pseudonymity

If you are subject to the Australian privacy regime, you have the option of not identifying yourself or of using a pseudonym unless we are required or authorised under Australian law or a court/tribunal to identify you or it is impracticable to deal with you anonymously or by a pseudonym.

Australia - Access and Correction of Personal Information

You have the right to request access to personal information we hold about you. We are able to deny access to some or all of your personal information in specified circumstances. We will provide reasons for any refusal in writing.

If you would like to request access to the personal information we hold about you please contact us by using the relevant Access or Correction contact in the Suncorp Group Privacy Contact Information table, which can be found [here](#) as we may be able to provide you this information within our normal business processes. If not, the staff member will be able to commence the privacy access request process for you which may require you to complete a privacy access request form. These requests may incur a fee and you will be advised of an estimated fee and the payment options at the time of written acknowledgement. This is usually provided to you within 5 business days.

Our response to your request will usually be completed within 30 days of receipt of the request. If we require further time we will contact you in writing to advise of this and provide our reasons for the further time that is required.

We rely on the accuracy of the personal information we hold about you to provide our products and services to you. You have the right to request us to correct any inaccurate, out-of-date, incomplete, irrelevant or misleading personal information. We will take such steps that are reasonable in the circumstances with regard to the purpose for which your personal information is held to make a correction. We may refuse to correct your personal information and will provide reasons for refusal in writing. If we refuse to correct your personal information you have the right to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take such steps that are reasonable in the circumstances to associate that statement with all records containing the relevant information. You can contact us to request the correction to the personal information we hold about you by using the relevant Access or Correction contact in the Suncorp Group Privacy Contact Information table which can be found [here](#).

Australia - Complaints Handling

If you have a complaint about how we collect, hold, use or disclose your personal information or a privacy related issue such as refusal to provide access or correction, please use our complaints process so that we can help. It is important to follow the complaint handling process in order to resolve your complaint effectively and efficiently.

If you are subject to the Australian privacy regime please note how we will deal with a complaint:

Step 1. Let us know

If you would like to make a complaint, please let us know by contacting the relevant department as they may be able to resolve the complaint for you. If not, the staff member will refer you to a Manager or their delegate and they will attempt to resolve the complaint. A response is usually provided to you within **5** business days. You can contact us by using the relevant Complaints contact in the Suncorp Group Privacy Contact Information table which can be found [here](#).







Step 2. Review by our Internal Dispute Resolution (IDR) Team

If you are not satisfied with the outcome of the business review you can request the complaint be referred to the IDR Team for review or you can contact them directly. Should additional information be required from you, we will contact you to discuss. The IDR Team will usually contact you with a decision within **25** business days of receiving your complaint. You can contact the IDR Team by using the relevant contact in the Suncorp Group Privacy Contact Information table which can be found [here](#).

Step 3. Seek review by an external service

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you may be able to access the services of an External Dispute Resolution Scheme. There are two schemes available:

Australia

<p>Office of the Australian Information Commissioner (OAIC)</p> <p>Complaints must be made in writing</p> <p> 1300 363 992</p> <p> Director of Compliance Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW 2001</p> <p> www.oaic.gov.au</p>	<p>Financial Ombudsman Service (FOS)</p> <p>FOS is available to those individuals who come within their terms of reference. FOS will advise you if they can assist you.</p> <p> 1300 780 808</p> <p> Financial Ombudsman Service GPO Box 3 Melbourne VIC 3001</p> <p> www.fos.org.au</p>
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New Zealand – Access, Correction and Complaints

If you are subject to the New Zealand privacy regime, you have the right to request access to personal information we hold about you. We are able to deny access to some or all of your personal information in specified circumstances. Please forward any request for access or correction to the relevant Privacy Officer. Any request for access or correction will be actioned as soon as reasonably practicable and no later than 20 working days. Please use these same details to lodge any complaint.

Contact details are:

<p>The Privacy Officer Vero New Zealand Private Bag 92120 Auckland 1142 New Zealand</p>	<p>The Privacy Officer Asteron Life New Zealand P O Box 894 Wellington 6140 New Zealand</p>
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If you are not satisfied with our response you may refer your complaint to the NZ Privacy Commissioner.

 0800 803 909
 New Zealand
Privacy Commissioner
PO BOX 466 Auckland
or
PO BOX 10094,
The Terrace,
Wellington 6143

 www.privacy.org.nz

Changes and getting a copy of the Policy

We encourage you to review and check our websites regularly for any updates to this Privacy Policy. We will publish the updated version on this website and by continuing to deal with us, you accept this Privacy Policy as it applies from time to time. If you would like a copy of this Privacy Policy, please contact us.