

Privacy policy

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Introduction

Cover-More Group Limited ("**Cover-More**") is a travel insurance, medical assistance and data analytics company. It owns Cover-More Insurance Services Pty Ltd (ABN 95 003 114 145), FitSense Insurance Services Pty Ltd (ABN 41 622 132 530), Travel Insurance Partners Pty Ltd (ABN 73 144 049 230) and World Travel Protection Pty Ltd (ABN 80 079 071 579). For more information about Cover-More, including a complete list of the companies it owns, please see <https://www.covermoregroup.com>. In this Privacy Policy ("**Policy**"), a reference to "**we**", "**our**" or "**us**" is a reference to Cover-More and the companies it owns.

This Policy outlines how we manage your personal information. It describes generally the type of personal information held and for what purposes, and how, that information is collected, held, used, disclosed and destroyed or de-identified. This Policy is reviewed at least annually and may be amended from time to time by posting the amended version on our website.

For further information on privacy in Australia, please visit the website of the Office of the Australian Information Commissioner ("**OAIC**") at www.oaic.gov.au.

Your personal information

Personal information is information that can identify or reasonably identify you. Sensitive information is personal information that includes information or an opinion about certain of a person's origin, opinions or associations, religion or beliefs, memberships or associations, orientation or practices, records, health and biometric information. Health information is any personal information about your health or disability.

We will only collect personal information to assist or enable us to perform one or more of our functions or activities. We collect the personal information we need to provide travel insurance and travel related products and services and assistance when you travel.

The type of information we collect and hold varies depending on the type of product or service we provide to you. For example, the information we will hold about if you have a travel insurance policy is different to the information we will hold about you if you make a claim on a policy or require assistance when travelling or when accessing and using any mobile applications or web portals. The information may include information about a permanent or temporary medical condition that you have or health information in general.

We regularly collect, hold, use and disclose health information and we are committed to protecting the privacy of this type of information to a higher degree than that of other personal information.

We may collect and hold the following personal information (including sensitive and health information):

- your name, address, phone number, email and other relevant contact details;
- your date of birth;
- your travel plans;
- information about your medical history and the medical history of any other person you wish to insure;
- health information, about anyone who requires assistance under their travel insurance policy;
- information about the medical history of any person that results in a claim that we have to assess;
- information about claims you make or wish to make under your policy;
- your bank account details so that we may pay your claim;
- the last eight digits of your credit card so that we may recover any monies payable under the travel insurance provided by the credit card company;
- other information required to administer the product or services you have requested including determining a claim;
- any details contained within identity documents provided to us including government identifiers such as a passport number and Medicare card number;
- the type of medical and non-medical assistance you have been provided by either us, our service providers or your own medical practitioner;
- employment and income information for cancellation and loss of income claims;
- background and credit checks (for authorised representatives and suppliers only);
- IP addresses of computers and mobile devices;
- information about your computers and mobile devices and your use of them, including the type of browser, or operating system you use, your domain name, access time, referring website addresses and page views; and
- information contained within a health or activity tracking device or mobile application including “**Health Trackers**” such as Fitbit, Google Fit, Jawbone, MapMyFitness, MapMyRide, MapMyRun, MapMyWalk, Misfit, Moves, Polar Flow, Runkeeper, TomTom Sports, Under Armour Record or Withings where you have authorised us to do so.

How we collect your personal information

We collect personal information from and on behalf of customers, business partners, suppliers, employers (relating to corporate policies), other insurers and third-party service providers.

We will, if it is reasonable or practicable to do so, collect your personal information directly from you. This may happen when you fill out an application form for travel insurance, become one of our representatives, make a claim, request assistance or register to access and use one of our mobile applications or web portals. This may occur over the phone, via email, a website or through one of our agents or partners.

In certain circumstances, we collect your personal information from third parties. For example, we may need to collect personal information from your representative (such as a legal guardian), your travel

consultant, the primary policy holder or another organisation. If your employer is the applicant on a corporate policy, we may collect your details from your employer.

We will collect your personal information from Health Trackers if you have authorised us to do so. If you are an authorised representative or third-party service provider, we may obtain information from a credit reporting agency or your agency group head office. In addition, we collect information when you visit our website, Facebook page and other pages that we own and manage.

We may also collect information by other means and, if we do, we will take reasonable steps to inform you how if not already explained in this Policy.

How we collect your sensitive and health information

Your health information, such as pre-existing medical conditions, is generally required to arrange travel insurance and travel related products and services, to make a determination on a claim or to provide you with medical assistance.

If you provide health information to your agent or consultant to provide to us as part of the policy application or claims process, we rely on you having provided them with your consent to disclose this information to us. In addition, when you provide information, including sensitive information, about other individuals on your travel insurance policy, we rely on you to inform them of the information you are providing, how we will use, hold, collect and disclose this information and on you obtaining their consent.

We may collect your health information from Health Trackers. We will only do this if you have given your consent.

If we do not have your consent, we will not collect your sensitive personal information. This is subject to some exceptions including where the collection, use and disclosure of the information:

- is necessary for the provision of emergency assistance;
- is required by law; or
- is necessary for the establishment, exercise or defence of a legal claim.

Use, transfer, handling and sharing of your personal information

TO PROVIDE YOU WITH PRODUCTS AND SERVICES

We use your personal information to provide you with the relevant products or services you have requested including:

- assessing your travel insurance application, including your eligibility for discounted travel insurance;
- identifying you, to manage and administer the product or service;
- assessing and paying a claim;
- to provide you with assistance when travelling;
- to provide you with access and use of our mobile applications or web portals; or
- to provide you with an analysis of your health and lifestyle based on information in your Health Trackers.

When handling claims, we only use the personal information which is relevant to making a decision about the claim.

We may use the information that is not sensitive information to send you material about our other products or services and our business partners' products and services (as described in "Marketing our products and services", below). We will only use your sensitive information for this purpose if you have consented to that use.

We may use or disclose your personal information for another purpose for which you may reasonably expect it to be used or disclosed by us and that secondary purpose is related or (if sensitive information) directly related to the primary purpose for which it was collected. Otherwise, we will only

use your information for a secondary purpose if you have consented to that use or disclosure, the use or disclosure is required by law or an enforcement body, to take appropriate action in relation to suspected unlawful activity or serious misconduct, or to provide assistance in a medical emergency.

We use and, in some instances, disclose your personal information when we, or third parties appointed by us, provide the following services:

- identifying you and other policy holders;
- arranging and managing your travel insurance with us;
- assessing an application for a product, including assessing any existing medical conditions;
- evaluating, managing, processing and paying an insurance claim;
- recovering monies due by other insurers;
- evaluating the emergency care and assistance you require;
- providing medical and non-medical assistance, including settling costs on your behalf;
- dealing with enquiries or complaints;
- monitoring and improving the services provided by us and our agents or service providers, the products we provide or our operations;
- planning, product development and research purposes and to seek feedback on products and services (including those products and services offered by others on our behalf);
- carrying out market analysis and research and product and pricing analysis and development;
- enhancing our services for our website visitors;
- conducting internal investigations in relation to crime and fraud prevention, detection or prosecution;
- training our staff;
- to identify and develop products or services that may interest you and market them to you (unless you ask us not to do so);
- carrying out accreditation or certification activities;
- processing orders or applications to become a customer for our additional products and services;
- carrying out credit checks, credit reporting and compliance checks through ASIC on our authorised representatives and suppliers;
- carrying out debt-recovery functions; and
- managing and authenticating customer data.

SHARING PERSONAL INFORMATION

To provide you with a more personal experience, such as providing you with products and services that are relevant to you, we may use and disclose your personal information for the purposes of providing, administering, improving and personalising products and services for you. To do this, we may exchange, share and combine personal information (we will only share sensitive information if we get your express consent) that we have collected from you (or disclosed to us). We may share your information with our related entities, our business partners and service providers to assist with services such as data processing and matching, data analysis, data monetisation services, information broking, business consulting, marketing and research (“**analysis services**”).

We may use such analysis services to also help us improve our products and services, the way we sell our products and services to you and to help us improve customer experience by understanding purchasing trends, your interests, relevancy of products and services and how you would respond in relation to products, services and offers from us or third-party providers.

The business partners and service providers we use to provide us with analysis services will generally be situated in Australia but may be situated in other countries. Before disclosing, exchanging or sharing such information, we take steps to ensure that our business partners and service providers are obliged to protect the privacy and security of your personal information and use it only for the purpose for which we disclosed it.

When we are provided with the results of such analysis services, we, our business partners or service providers may provide marketing communications and targeted advertising to you on an ongoing basis by telephone, electronic messages (e.g. email), digital services (e.g. through Apps) and other means. These communications may relate to the products and services we or our related entities offer, our business partners offer, or other products and services which may be of interest and relevant to you.

At any time, you can advise us that you wish to opt out of future contact by contacting us via our customer service team on 1300 72 88 22 or via the unsubscribe function in all our email or text marketing communications.

Transferring personal information overseas

By purchasing a policy through us, you are consenting to us sending your information to overseas parties if required to provide you with medical and non-medical assistance or to progress and assess your claim. The countries we typically disclose your personal information to under these circumstances are generally located in the geographic regions you travelled whilst covered by your policy or our products and services.

We may also need to disclose information to service providers who are located overseas who assist us by managing and authenticating some customer data or by seeking feedback from our customers to help us improve our products and services. Which service providers we use are and where they are located may change from time to time. You can contact us for details.

While we are committed to protecting your information from misuse, loss or interference when your personal information is sent to third parties overseas, in some cases we may not be able to take reasonable steps to ensure that those third parties do not breach Australian privacy laws and your information may not be subject to the same level of protection as is provided by Australian privacy laws. You may not be able to seek redress under Australian privacy laws or under laws in the overseas jurisdiction in the event of any misuse, loss or interference with your personal information.

When assessing your claim, we may refer to information provided by our third party medical and non-medical assistance providers, which may include our related entities. We may also use related entities to process and assess your travel insurance application or claim and to administer your insurance policy. These related entities may be based in Australia or overseas, including in New Zealand, United Kingdom, Malaysia, China or India. We or our related entities may enter into outsourcing arrangements to countries other than those listed above.

How accurate is your personal information

We take reasonable steps to ensure that the personal information collected, used or disclosed is accurate, relevant, complete and current. If you believe your personal information is not accurate, complete or current, please contact our customer service team on 1300 72 88 22.

Protecting your personal information

We take reasonable steps to securely store your personal information so that it is protected from unauthorised use, access, modification or disclosure. We store personal information in different ways, including in paper and electronic form, on our premises and our data centres and our service providers' premises, cloud storage services and data centres (which include IT service providers and document storage and management providers) usually located in Australia.

We maintain administrative, technical, and physical safeguards for the protection of personal information. Our security measures include:

Administrative safeguards

- Access to your personal data is restricted to authorised personnel who have a legitimate need to know based on his or her job. Where an employee no longer requires access, that employee's access is revoked. We impose similar restrictions on third-party contractors who process personal information on our behalf.
- Only allowing access if the employee seeking access has satisfied our identification requirements, such as a security check on the commencement of a call.
- Confidentiality requirements for our employees and suppliers.

- Secure document storage.
- Training and education is provided to all group employees in the handling of personal information.

Technical safeguards

- Security measures for systems access.
- Antivirus and anti-malware software and regularly updated virus definitions.
- Third parties who we hire to provide services and have access to personal information agree to implement privacy and security practices that meet our requirements.
- Personal information provided on servers is secured in a restricted and controlled network environment.
- When transferring credit card numbers via payment gateways the data is encrypted.
- Employing firewalls and intrusion detection systems.

Physical safeguards

- Third-party contractors who process personal data on our behalf agree to meet our physical safeguard requirements.
- Employing physical and electronic means such as alarms and cameras to protect against unauthorised access to buildings.
- Effectively and securely destroying data no longer needed, for example, by shredding or pulping in the case of paper records.
- Our security procedures and policies are audited on a regular basis to ensure they are updated in accordance with current legal requirements and current levels of security technology.

While we have security measures in place to protect your data, data transmission over the internet is not absolutely secure. As a result, while we strive to protect your personal information, we cannot warrant or ensure the security of any information you transmit to us or we transmit on your behalf, or to you, in the course of providing services over the internet.

Marketing our products and services

We may from time to time provide you with information about other products, services and offers. If you do not wish to receive this information, or wish to know the source of the information, please contact our customer service team on 1300 72 88 22. You can change your mind about receiving information about our products and services at any time, by contacting us or using the opt-out process on our offers or promotional communication.

Please note we will still need to send you essential information about your insurance, travel alerts, policy and claim documentation.

We do not sell your personal information, and we do not sell or pass on mailing lists to any third parties.

When we share your information with other parties

We may share your personal information with a third party to fulfil service or product obligations to you, or if it is required or permitted under law or in an emergency situation.

Before discussing with any third party such as a relative or companion the progress of a claim or the medical and non-medical assistance that we provide to you, we will obtain appropriate consent from you, your parent or guardian, power of attorney or executor.

Below are the types of entities we may collect your personal information from and may disclose your personal information to (this is not an exhaustive list):

- the insurer and any re-insurers;
- co-insureds on any insurance policy so we may confirm details of the insurance;
- your travel agent, broker or the consultant who sold you the travel insurance;
- your employer (if a corporate policy);
- claims administrators;
- investigators, in relation to claims;
- translators, for claims and assistance;
- goods replacement suppliers to settle your claim;
- banks and foreign currency providers to settle your claim;
- transportation and accommodation providers;
- travel consultants and wholesale travel agencies;
- medical practitioners and specialists;
- medical providers such as hospitals;
- emergency assistance providers;
- security providers and consultants;
- family members in the event of a medical emergency;
- witnesses, when making a claim;
- record management and storage businesses;
- companies who perform statistical analysis on our behalf;
- customer survey businesses and mystery shopping agencies;
- accreditation or certification organisations;
- our professional advisors including lawyers, accountants, tax advisors and auditors;
- debt collection agencies and other parties that assist with debt-recovery functions;
- police, law enforcement bodies and courts as required or authorised by law;
- regulatory or government bodies for the purposes of resolving customer complaints or disputes both internally and externally or to comply with any investigation by those bodies;
- insurance reference bureaus;
- data retrieval agencies;
- credit providers or credit reporting agencies (if you are our authorised representative or supplier);
and
- printing, mail and distribution companies.

Your privacy on the internet and when using mobile applications

Cookies

We use cookies in several different ways and some of our cookies collect information which can personally identify you.

A cookie is a small, text-based file used frequently on some websites and portals. A cookie is designed to assist and streamline the exchange of information between your computer's browser and our computer systems. We may use some cookies to collect information about the use of our websites and web portals. The information collected includes where visitors connect from, what version of browser they use and their path through the site. It helps us to provide personalised features and keep our content fresh and relevant.

If you are our current or former customer, we may use a special cookie that identifies you. We may use the cookie to collect the website and browser information referred to above and may combine that information with your customer history and other personal information we hold about you. We may use and disclose the combined information to perform analysis services and send you marketing communications and targeted advertising as described in this Policy, as well as use and disclose it for other purposes described in this Policy.

If you do not want information collected through the use of cookies, you can configure your cookie preferences and options through your browser.

Web beacons

Our web pages may contain electronic images, known as web beacons or spotlight tags. These enable us to count users who have visited certain pages of our website. Web beacons and spotlight tags are not used by us to access your personal information, but are simply a tool we use to analyse, in aggregate, which web pages customers view.

Links to other websites

Our web sites may contain links to web sites that are not ours. Whilst such links are provided for your convenience, you should be aware that the information handling practices of the linked web sites might not be the same as ours.

Location information

With your consent, we may collect information about your physical location when you use our mobile applications and when you request or purchase products or services. You may stop the collection of this information at any time by changing the settings on your mobile device. Some features of our mobile applications may no longer function if you do so.

Native Applications on Mobile Devices

Some features of our mobile applications may require access to certain native applications on your mobile device, such as the camera, photo album and the address book applications. If you decide to use these features, we will ask you for your consent prior to accessing the applications and collecting associated information. You may revoke your consent at any time by changing the settings on your device.

Push Notifications

With your consent, we may send push notifications or alerts to your mobile device. You can deactivate these notifications or alerts at any time by changing the notification settings on your mobile device or within our mobile applications.

Dealing with us

Resolving your privacy issues

Please contact us if you have concerns about the way we handled your personal information, feel we breached the Australian Privacy Principles, or would like to discuss any issues about this Policy. You can speak directly to our staff and they will do their best to resolve your issue. We also have a complaints process including external dispute resolution and a privacy officer who can be contacted (see “**Contact Us**”).

We will deal with any complaint by investigating it and providing a response to you within a reasonable time, provided that we have all necessary information and have completed any investigation required. In some cases, we may need to ask you to put your complaint in writing so that we are sure that we understand it, and may also need to ask you for further information or to verify your identity. We will attempt to confirm as appropriate and necessary your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will treat your complaint confidentially and respond to you within a reasonable time, usually in writing.

If you are dissatisfied with the outcome, please contact us. You may also take your complaint to the Office of the Australian Information Commissioner. The contact details for the OAIC are available from the OAIC’s website at www.oaic.gov.au.

Gaining access to and correcting your personal information

You can request access to your personal information in most cases without restriction or charge. If charges are applicable for providing access, we will disclose these charges to you prior to providing

you with the information. In limited circumstances, a request for access may be denied, or restricted access given. We will provide reasons in writing for the denial of or limitation on access.

To arrange access please contact us (see “**Contact Us**”). In some cases, we may be able to deal with your request over the telephone. Access to the requested information may include providing you with copies of the original documentation, providing you with the opportunity for inspection of the documentation at our premises or providing you with a summary.

We will correct personal information if we discover, or you are able to show, that the information is incorrect. If you seek correction and we disagree that the information needs correction, we will provide you with our reasons for taking that view and advise you on the further steps you may take.

Dealing with us anonymously or under pseudonym

You can deal with us anonymously or you may use a pseudonym where it is lawful and practicable. For example, you may inquire about our products or request a quote. However, we will not be able to offer you travel insurance, assess and pay your claim, appoint you as our authorised representative or provide you with medical and non-medical assistance if we cannot identify you.

Your travel consultant and your personal information

We require our agents and partners to handle your personal information in a manner consistent with this Policy. If you authorised your travel consultant to arrange your travel insurance, we rely on you having provided your travel consultant with your consent if you would like us to share information about your claim or existing medical condition assessment with them. You may choose to deal directly with us if you prefer not to provide them with information about existing medical conditions and health related matters included in your claim.

Contact us

Customer Service

Email: enquiries@covermore.com.au

Phone: 1300 72 88 22

or

Privacy Officer

Cover-More Insurance Services Pty Ltd
Private Bag 913, North Sydney, NSW 2059

Email: privacy.officer@covermore.com.au