

## PRIVACY POLICY

At Delaney Kelly Golding Pty Ltd, we are committed to protecting your privacy in accordance with the Privacy Act 1998 (Cth). This Privacy Policy describes our current policies and practices in relation to the handling and use of personal information.

This Privacy Policy applies to Delaney Kelly Golding Pty Ltd (DKG) ABN 35 000 663 221 and ACN 000 663 221 (we, our and us) and any personal information that you provide to us.

At DKG, we're committed to safeguarding people's privacy and the confidentiality of their personal information and are bound by the Privacy Act 1988 (Cth) (the "Act") and the Australian Privacy Principles set out in the Act.

This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of your personal information. It also deals with how you can complain about a breach of the privacy laws and how you can access the personal information we hold.

The Act applies to DKG's collection, use and disclosure of your personal information as well as other applicable laws protecting privacy.

### Our commitment

At DKG, we fully acknowledge the fact that your personal information belongs to you, we are fully committed to securely store and carefully process the information you share with us. We do not provide the information to third parties without your knowledge.

## Personal information we collect and use

When we arrange insurance on your behalf, we ask you for the information we need to advise you about your insurance needs and management of your risks. We collect personal information including:

- Identification information, including your age or date of birth and gender;
- Contact information, including residential and mailing address, email address, telephone number and other contact details;
- Details of property insured;
- Financial information, including bank details or other information about your financial circumstances, as applicable;
- Information obtained as part of the processing of a claim;
- Sensitive information such as Health information;
- Information relevant to your claim history;
- Past employment, residency status and proof of identity; and
- Any other personal information that may be required in order to facilitate your dealing with us.

We provide any information 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.

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 assist you by collecting information about your claim. Sometimes we also need to collect information about you from others. We provide this information to your insurer (or anyone your insurer has appointed to assist it to consider your claim, e.g. loss adjusters, medical brokers, etc.) to enable it to consider your claim. Again, this information may be passed on to reinsurers.

From time to time, we will use your contact details to send you direct marketing communications including offers, updates and newsletters that are relevant to the services we provide. 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 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 all 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. We may not be able to provide our product or services if we are not given all the personal information we have asked for. This includes not issuing policies and not processing claims.

### **Offshore disclosure of personal information**

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 New Zealand, the Philippines and Vietnam and your information may be disclosed to those organisations.

Specifically, we may disclose your personal information to our service supplier located in Philippines, which provides sales, claims and administrative services.

Please note that the data protection laws and other laws of the countries to which your information may be disclosed might not be as comprehensive as those in Australia. However, where practicable in the circumstances, we will take reasonable steps to ensure that overseas recipients use and disclose such personal information in a manner consistent with this Privacy Policy.

## **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 personal information in secure systems, databases and paper records.

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 and passwords 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 may need to provide your information to contractors who supply services to us, e.g. to handle mailings on our behalf, external data storage providers or to other companies in the event of a corporate sale, merger, re-organisation, dissolution or similar event. 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. However, we will take reasonable measures to ensure that they protect your information as required under the Privacy Act.

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.

## **How can you check, update or change the information we are holding?**

Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. 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 write to our Privacy Officer at Delaney Kelly Golding Pty Ltd, PO Box 1670, North Sydney NSW 2059.

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.

## **Website information and content**

The information provided on this 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 forms (Claim Forms, Employment and Contact request). The information submitted via the Forms is not encrypted – an option is available for claim forms to be downloaded in PDF format for faxing. Should you be concerned about confidentiality of the claim information, this would be the recommended method.

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 DKG staff only (password protected).

We 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 occasionally notify you 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.

We may use your information internally to help us improve our services and help resolve any problems.

### **What happens if you want to complain?**

If you have concerns about our handling of your personal information or an alleged breach of the Act and the Privacy Principles, please contact us and provide us with the details of your complaint or the alleged breach.

Please contact our Privacy Officer.

Attn: Privacy Officer  
Delaney Kelly Golding Pty Ltd  
PO Box 1670, North Sydney NSW 2059  
Email: [compliance@dkg.com.au](mailto:compliance@dkg.com.au) or Tel: (02) 9929 7299

Your complaint will be considered by us through our Internal Complaints 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 Australian Financial Complaints Authority if we cannot resolve your complaint.

If you think we have not handled your personal information correctly, you can make a complaint with our Privacy Officer, the Office of the Australian Information Commissioner (OAIC) or, in certain circumstances, the Australian Financial Complaints Authority (AFCA). We recommend you contact us first so we can try and resolve your complaint effectively and efficiently as generally, the OAIC and AFCA will refer you back to us if you have not already complained to us.

If you are not satisfied with the outcome of your complaint, you can take your complaint further including to the:

**Office of the Australian Information Commissioner (OAIC)**

Complaints to the OAIC must be made in writing.

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Phone: [1300 363 992](tel:1300363992)

or

**Australian Financial Complaints Authority (AFCA)**

AFCA can consider certain privacy complaints. You should contact AFCA to check if they can help you.

Website: [www.afca.org.au](http://www.afca.org.au)

Email: [info@afca.org.au](mailto:info@afca.org.au)

Phone: [1800 931 678](tel:1800931678)

Mail: Australian Financial Complaints Authority, GPO Box 3, MELBOURNE VIC 3001

**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.



## Privacy policy updates

We may update our Privacy Policy from time to time. If we do so we will notify you by placing a notice on our website. Therefore, please review our Privacy Policy on our website for changes.

## Further information

At DKG, we welcome your questions and comments about privacy. If you have any concerns or complaints, please contact our Privacy Officer on telephone number (02) 9929 7299 or by email [compliance@dkg.com.au](mailto:compliance@dkg.com.au).