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## **Privacy Policy**

The privacy of personal information you provide to us (your personal information) is important to us. The following privacy governs the collection and use of your personal information by Navigates GP Pty Ltd (ABN 65 103 438 277) trading as Navigates General Insurance [Corporate Authorised Representative No 1253295], its related entities, its business's (including but not limited to Navigates Real Estate, Navigates Mortgage Broking, Navigates Financial Planning, Navigates Accounting and Navigates Body Corporate and Community Management), subsidiaries, directors, officiers, employees, and independent contractors of Navigates General Insurance including their directors, officiers, contractors and the Agent/Broker that will assist you ("we", "us" or "the group").

We are Authorised Representatives of the National Adviser Services Pty Ltd t/as Community Broker Network which is an Australian Financial Services Licensee (AFSL No. 233750). Community Broker Network supports the Australian Privacy Principles and operates in accordance with the requirements of the Privacy Act 1988 (Cth) including the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

We are committed to protecting your privacy in compliance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). This document sets out our Privacy Notice.

Your privacy is important to us and we are committed to handling your personal information in a responsible way in accordance with the Act. This is our Privacy Policy and sets out how we collect, store, use and disclose your personal information.

By asking us to provide you with our financial services, you consent to the collection and use of the information you have provided to us for the purposes described above.

### The information we collect

We may collect personal information from you through our call centres, by telephone, letter, fax or email, through our Agents, when interviewing you, through our pop-up kiosks, from our website (through your access or use) and from competitions, promotions, surveys, providing feedback to which you choose to respond or complaining to us and from publicly available sources of information including social media.

We only use your information for the purpose for which it was provided to us, related purpose and as permitted by law.

We will usually provide some or all of this information to our product suppliers to allow us to provide advice to you, and arrange financial services on your behalf. Some of these product suppliers may be located outside Australia.

When a claim is made under an insurance policy, to enable us to assist in the claim process, we and our representatives and those of the insurer (including loss adjusters, investigators, medical advisers and lawyers) collect information about the claim, some of which may be personal information. We may collect the information from you or from third parties.

We provide this information to the insurer and or their agents and those appointed to assist you in making a claim. Again this information may be passed on to your underwriters and reinsurers. We may use your personal information internally to help us improve our services and help resolve any problems.

In some circumstances, we may also collect sensitive information (such as medical conditions and criminal records) which are required to obtain insurances on your behalf.

We can only apply for and arrange financial service products if we have all relevant information. The insurance laws also require insureds to provide all the information required by the end insurer to help them decide whether to insure you and on what terms. Credit Providers also require specific information to help them assess any credit applications that we may facilitate on your behalf.



## How we disclose your information

We may disclose information to:

- Financial institutions, other Australian Financial Service Licensees, insurers, underwriters, underwriting agencies, wholesale brokers and reinsurers (for the purpose of seeking recovery from them or to assist them to assess insurance risks);
- Premium funders / Credit providers for the purposes of gaining quotations on and arranging funding of your insurance premiums / financial investments.
- An investigator, assessor, State or Federal Health Authorities, lawyers, accountants, medical practitioners, hospitals or other professional advisors (for the purposes 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.

Some of these parties may be located overseas for example, Lloyds of London syndicates or brokers and other overseas based insurers and intermediaries or in situations where we utilise "Cloud Computing" services that are situated outside Australia

In all such cases we commit to making reasonable enquiries to ensure that these organisations comply with their local privacy legislation where such legislation is comparable to the Australian legislation and to comply with the key components of Australian Privacy legislation in cases where their local legislation is considered inadequate or non-existent.

However, you acknowledge, by agreeing to the disclosure of your information to these entities outside of Australia, we will no longer be required to take reasonable steps to ensure overseas recipient's compliance with the Australian privacy law in relation to your information and we will not be liable to you for any breach of the Australian privacy law by these overseas recipients and, on this basis, you consent to such disclosure.

# Accuracy, access and correction

We take reasonable steps to ensure the information we collect and hold about you is accurate, complete and up to date. However, we rely on you to advise us of any changes to your information or corrections required to the information we hold about you.

Please let us know as soon as possible if there are any changes to your information or if you believe the information we hold about you is not accurate, complete or up to date.

We will, on request, provide you with access to the information we hold about you unless otherwise required or permitted by law. We will notify you of the basis of any denial to access your information.

We do not charge for receiving a request for access to personal information or for complying with a correction request. We do however reserve the right to charge you for all reasonable costs and outgoings specifically incurred in meeting your request for information.



## How we store your personal information

We hold the information we collect from you in our computer system and in our hard copy files. We ensure that your information is safe by following the usual security procedures expected by our clients.

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or exposure. We require all our Employees, Contractors and Agents (Representatives) to maintain the confidentiality of customer information.

Access to information stored electronically is restricted to our Representatives whose job requires access to the information.

Access to our computer systems is restricted through password protection. If we no longer need your personal information, we destroy or remove identify information.

## **Legal Disclosure**

We reserve the right to disclose your personal identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served.

## **Complaints about Privacy**

Should you have a complaint regarding a breach of this Privacy Policy, or the privacy principles of the Act, you can contact Mr Bruce Flint on 1300 354 687 or gi@navigates.com.au.

We will investigate the issue and determine the steps we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the determination of Mr Bruce Flint.

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.

# **Revision of our Privacy Policy**

We reserve the right to revise this Privacy Policy or any part of it from time to time. Please review this policy periodically for changes.

Your continued use of our products and services, requesting our assistance, applying for or renewal of any of our products or services or the provision of further personal information to us after this Privacy Policy has been revised constitutes your acceptance of the revised Privacy Policy.

# **Website Privacy**

### **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 may log your server address, the date and time of your visit, the pages and links access 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.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website and track users movements.

#### Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy of any third party website and we are not responsible for the privacy policies or content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

#### **Forms**

Our website may allow visitors to submit information via Self-Service forms (Quotes, Claim Forms, Employment and Contact request). The information submitted via the Forms may not be encrypted. Should you be concerned about the confidentiality of any information provided by any Self Service forms please do not hesitate to lodge this information with us via phone or email.

We may also use your contact information that you supply on this website to send you product information and promotional material and to enable us to manage your ongoing requirements, for example renewals, and our relationship with you, for example invoicing and client surveys.

We may also notify you via direct marketing 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 also use your information internally to help us improve our services and help resolve any problems.

### Contacting us and feedback

You can make any requests relating to your personal information held by us or any complaints regarding treatment of your privacy by contacting, Mr Bruce Flint on 1300 354 687 or gi@navigates.com.au.



National Adviser Services Pty Ltd t/as Community Broker Network | ABN 60 096 916 184 |

AFSL 233750

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