

Privacy Policy

Definitions in this Privacy Policy

'Our', 'Us' and 'We' refers to Greenstone Financial Services Pty Ltd (GFS), ABN 53 128 692 884 Australian Financial Services 343079 of Level 2, 58 Norwest Blvd, Bella Vista NSW 2153.

'Personal Information' means any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- Whether the information or opinion is true or not; and
- Whether the information or opinion is recorded in a material form or not.

'Related Companies' has the same meaning as section 50 of the Corporations Act 2001 (Cth).

'Sensitive Information' is a sub set of Personal Information defined as:

- (a) Information or an opinion about an individual's:
 - i. Racial or ethnic origin; or
 - ii. Political opinions; or
 - iii. Membership of a political association; or
 - iv. Religious beliefs or affiliations; or
 - v. Philosophical beliefs; or
 - vi. Membership of a professional or trade association; or
 - vii. Membership of a trade union; or
 - viii. Sexual orientation or practices; or
 - ix. Criminal record; or
- (b) Health information about an individual; or
- (c) Genetic information about an individual that is not otherwise health information; or
- (d) Biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (e) Biometric templates.

'You' and 'Your' refers to our customers and prospective customers. It also refers generally to users of Our web site.

Our Commitment

We recognise that Your privacy is very important to You. We are committed to protecting the privacy of your Personal Information in accordance with the Federal Government's Privacy Act 1988.

The Privacy Act details Australian Privacy Principles that set minimum standards for how private sector organisations should collect, use, disclose, keep secure and provide access to Personal Information.

This Privacy Policy outlines how We manage Your Personal Information.

Currency and Status of Our Privacy Policy

Our current Privacy Policy is detailed below. It is current as of and from 15 May 2015. We suggest that You read it thoroughly.

By visiting Our website, applying for, renewing or using any of Our products or services, making a claim or providing Us with Your Personal Information, You agreed to Your Personal Information being collected, held, used and disclosed as set out in this Privacy Policy.

This policy may change from time to time and all changes will be posted on Our web site so please check it periodically. Alternatively, You can telephone **1300 367 325** or email privacy@greenstone.com.au and request a copy of Our most recent policy. Whenever using Our websites You should read this policy in conjunction with the relevant website's Terms of Use.

Types of Personal Information We collect

The Personal Information We collect depends on the products and services You use or apply for. Typically the details we collect and hold include Your name, contact details (address, phone and fax number, email address), date of birth, gender and payment details. We may also collect information that is specific to a particular product.

We will only collect 'Sensitive Information' where it is necessary for the purposes of determining risk or for providing You with a specific product or service including the management of a claim.

The types of Sensitive Information We collect (or that might be inferred from other information that we collect) generally includes the following:

- Race or ethnic origin; or
- Criminal record; or
- Health information; or
- Sexual practices; or
- Membership of a professional or trade association or trade union.

Why We collect Your Personal Information

We generally collect Personal Information to provide the various products and services We offer, or otherwise as permitted by law. Such purposes include responding to Your enquiries; providing You with assistance You request of Us; maintaining and administering Our products and services (for example processing requests for quotes, applications for insurance, underwriting and pricing policies, issuing You with a policy, managing claims, processing payments); processing Your survey or questionnaire responses; market research and the collection of general statistical information using common internet technologies such as cookies; providing You with marketing information regarding other products and services (of Ours or a third party); quality assurance and training purposes; performing administrative operations (including accounting and risk management) and any other purpose identified at the time of collecting Your information.

We may combine or link Personal Information We already hold about You to other Personal Information We collect about You. Third party marketing service providers may combine the Personal Information We disclose to them with information they already hold about You, in order to provide You with more relevant advertising about Our of their products and services.

Third parties are prohibited from using Your Personal Information for purposes other than those for which it is supplied. If You do not consent to Us collecting, using or disclosing all or some of the Personal Information We request, We may not be able to provide You with the product or service that You are seeking. It may also prevent Us from maintaining or administering Your policy or the provision of information regarding Our products or services or those of any third party.

How We collect Your Personal Information

We collect Your Personal Information from You in various ways and at several different points. We may collect Your Personal Information on our web site, by telephone, facsimile, when you complete an application form for one of Our products or services and forward it to Our attention, enter a competition or voluntarily participate in a survey.

Wherever possible, We collect Your Personal Information directly from You. There may, however, be occasions where We collect Your Personal Information from someone else.

Collection of Your Personal Information may include Us collecting from:

- Our authorised representatives;
- Our distributors or referrers, agents, business partners and affiliates, other insurers or Related Companies;
- Our service providers;
- The insurer of any policy We arrange for You;
- Your insurer's appointed service providers including claims assessors;
- Family members or anyone You have authorised to deal with Us on Your behalf;
- Our legal or other advisers;
- Social media and other virtual communities and networks where people create, share or exchange information;
- The Financial Ombudsman Service or any other external dispute resolution body;
- Policyholder or others who are authorised or noted on the policy as having a legal interest in it, or where they have been appointed under power of attorney or otherwise to manage Your affairs;
- Clubs, associations, member loyalty or rewards program providers and other relevant organisations;
- Publicly available sources of information;
- Data partners, analytic consultants and other similar organisations; and
- Any other organisation or person where You have consented to them providing Your Personal Information to Us or consented to Us obtaining Personal Information from them.

If You provide Personal Information to Us about another person, We rely on You to have made or make them aware that You will, or may, provide their information to Us and the types of third parties We may provide it to, the relevant purposes We and any of the third parties will use it for and how they can access it. If it is Sensitive Information We rely on You to have obtained their consent on these matters. If You have not done, or will not do, either of these things, You must tell Us before you provide the relevant Personal Information.

A number of interactive tools or facilities may be available on Our web sites. If You use any of these tools or facilities, We generally do not collect your Personal Information unless a particular tool permits You to suspend or save information and recover those details at a later time. In these circumstances, Your Personal Information may be retained on our systems but is not processed or used by Us except that it may be used for the purposes of online quoting and subsequent follow up.

From time to time We may request Personal Information from You through competitions or surveys. Participation in these competitions or surveys is completely voluntary and You, therefore, have the choice of whether or not You disclose the Personal Information requested. We may use Personal Information We collect through surveys or questionnaires to assess Your satisfaction with Our products and services and to determine how We may be able to better service Your needs.

Anonymity and Pseudonymity

Where possible, You have the option of interacting with us anonymously. For example, You may visit and browse our website and use some of our online facilities without having to reveal any Personal Information.

Cookies and Our collection of information about how Our website is used

We use a cookie that collects anonymous traffic data. A cookie is a message given to a web browser by a web server and which is then stored by the browser in a text file. Each time the browser requests a page from the server this message is sent back which enables the user's computer address (IP address) to be identified.

We may use the information provided by cookies and IP addresses to analyse trends, administer the site, or for research and marketing purposes to help us better serve our clients. No information which personally identifies You will be collected through the cookies. You can set Your browser to notify You before You receive a cookie so You have the chance to accept it and can set Your browser to turn off cookies.

No personally identifying information from You will be collected as part of these cookies.

We may also collect Your information through Your use of online forms. Some forms are provided by third parties who may have access to Your Personal Information but will only disclose that information to Us, or as they are lawfully required.

Direct Marketing

On occasion, We, and Our Related Companies, may use Your Personal Information to provide You with information about the products and services We or Our distributors, referrers, agents, business partners, affiliates and any proposed new or incoming insurer may offer.

If You do not wish to receive any of this information please let Us know by contacting us.

Sharing and Disclosing Your Personal Information

We never sell, rent or trade your Personal Information.

We may share your Personal Information with Related Companies. We will share Your Personal Information with the issuer of Your financial product (please refer to your Product Disclosure Statement). Your insurer may also share Your information with its related parties and service providers. To find out more about how Your insurer discloses information please refer to their privacy policy or the summary as provided in Your Product Disclosure Statement.

We will not share Your Personal Information with any other unrelated party except under the following circumstances:

- In accordance with this Privacy Policy;
- As provided in a collection notice We give You;
- Where You have consented to the use or disclosure;
- For purposes related to: research (including market research), planning, service development, security, testing and risk management;
- Where a product or service You apply for is provided or supplied by or through a third party;
- Where a third party, such as a mailing house, carries out activities on Our behalf;
- If disclosure is otherwise required in order to provide You with a particular product or service;
- In order to ensure Our ability to continue providing products and services;
- If disclosure is required for the purposes of conducting business analysis in order to improve Our products and services;

- If disclosure is required by law or requested by a statutory, regulatory or ombudsman authority;
- To an insurance broker acting on Your behalf or who You have designated to act on Your behalf;
- Where a third party has an interest in the product or service We supply, for example a mortgagee, referral agent, distributor or insurance intermediary; and
- Where it is necessary for a third party to assist us in providing our services or professional advice to us, for example, reinsurers, insurance intermediaries, insurance reference bureau, lawyers, accountants, loss adjusters and others involved in the claims handling process where you have provided your consent – which may be given expressly or may reasonably be implied by your conduct.

We do not usually send Personal Information to other parties outside of Australia.

Related and unrelated third parties to whom Your Personal Information is disclosed are required to keep the information confidential and only use it for the same purposes we are permitted to use it.

Quality and Security of Your Personal Information

We aim to ensure that your Personal Information is accurate, complete and up to date.

During the course of Your relationship with Us we will ask you to inform us of any changes to your Personal Information. You should, however, contact Us at any time to update your Personal Information or advise Us that the information we have is not accurate or complete.

We are committed to keeping your Personal Information secure and will use all reasonable precautions to protect it from loss, misuse or unauthorised alteration, including:

- Physically securing external and internal premises;
- Maintaining computer and network security such as user identifiers and passwords to control access to computer systems;
- Restricting access to Your Personal Information to employees or those who perform services on Our behalf who are authorised to handle Your Personal Information and on a 'need to know' basis;
- Entering into confidentiality agreements with relevant employees and third parties;
- Appropriate training of staff;

- Retaining your Personal Information for no longer than it is reasonably required to service a policy or continue to provide any products and services requested by You, unless We are required by law to retain it for longer; and
- Taking reasonable steps to destroy or de-identify Personal Information that We no longer require.

Access to and correction of Your Personal Information

You may generally access the information We hold about You and request corrections. This right is, however, subject to the exceptions detailed in the Australian Privacy Principles. For example, We may refuse access where:

- The information may have an unreasonable impact on the privacy of others; or
- The request is frivolous or vexatious; or
- The information relates to existing or anticipated legal proceedings; or
- The information would reveal our intentions in relation to negotiations in such a way as to prejudice those negotiations.

If We deny you access We will let You know why

Where providing access would reveal evaluative information in connection with a commercially sensitive decision-making process, We will provide an explanation for the decision rather than direct access to the information. In most cases, You may access a summary of Your Personal Information at no cost to You by telephoning us on **1300 367 325** or emailing privacy@greenstone.com.au.

For access to complex or Sensitive Information or more detailed requests for access to Your Personal Information, for example, access to information that is archived, We may require you to place your request in writing and charge You a fee for our reasonable costs of retrieving and supplying the information to You.

In all cases You will be asked to verify who You are before your Personal Information is provided. All requests for Personal Information will be handled in a reasonable period of time.

How to contact us about Privacy

If You have any questions, suggestions or complaints about Our privacy practices or this Privacy Policy, please contact our Privacy Officer using one of the methods below:

Address – 58 Norwest Blvd, Bella Vista NSW 2153

Phone – 1300 367 325

Email – privacy@greenstone.com.au

We will respond to your question, suggestion or complaint as soon as possible.

If You are not satisfied with our response to Your enquiry or complaint You can contact the Privacy Officer and request that it be reviewed by a senior staff member who will endeavour to resolve Your dispute within 45 days from when you first notified us. If You are still not satisfied we will tell You about any external dispute resolution provider which may be available to You.

You can obtain information on privacy issues in Australia by visiting the Australian Federal Privacy Commissioner's web site located at www.oaic.gov.au, by email at enquiries@oaic.gov.au or by telephoning 1300 363 992.