Privacy Policy

Overview

Mirabelle Underwriting Pty Ltd (Mirabelle) is a corporate authorised representative of Specialist Underwriting Agencies Pty Ltd (SUA). Mirabelle, SUA and each of its other related entities (together "we, us, our") understand our customers' concern about the privacy of their information.

Our Privacy Policy describes how we treat any personal information that we receive about our customers. It outlines the type of personal information we collect, how that information may be used, to whom we permit access and how we protect that personal information. Our Policy is part of our ongoing commitment to the protection of our customers' privacy.

We are dedicated to protecting the confidentiality and security of the personal information which we collect about our customers and do so in accordance with the *Privacy Act 1988* (including the Australian Privacy Principles (APP's)).

Any questions about the general privacy principles may be directed our Privacy Officer or to the Office of the Australian Information Commissioner whose website details are: www.oaic.gov.au.

1. Open and transparent policies (APP 1)

We have and will continue to take all reasonable steps to implement and maintain practices, procedures and systems to ensure that we comply with all our obligations under the Privacy Act. Do not hesitate to contact us if you have any questions about this policy or any matters arising from it.

2. Anonymity and pseudonymity (APP 2)

You may not wish to identify yourself or you may wish to use a pseudonym and this is an option provided that this does not make it impractical for us to deal with you.

Please note that it will generally be impractical for you to deal with us anonymously or under a pseudonym, should you wish to enter into a contract of insurance or make a claim. The reason for this is because your identity is a relevant factor in relation to the risk of insurance and the process of claims. It is material to our decision of whether or not to insure you and if so on what terms and at what premium. Pursuant to the *Insurance Contracts Act 1984* (Cth) you have a duty of disclosure and your identify is a material factor to disclose.

Mirabelle Underwriting Pty Ltd | ABN 93 627 823 910
A corporate authorised representative (AR 001284118) of
Specialist Underwriting Agencies Pty Ltd (ABN 18 010 862 754 | ASFL 231104)

info@mirabelle.com.au
www.mirabelle.com.au
(02) 40561460

3. Collection of information (APP 3 & 4)

3.1 Personal Information (App 3)

The sort of information we collect may include:

- your name, address and other contact information, date of birth, drivers licence, health information,
- details of any property being insured,
- your personal qualifications (if relevant) including your occupation,
- personal information of any person who may be covered by a policy of insurance,
- financial details in cases where insured property is financed,
- personal information of persons authorised by you to deal with us on your behalf.

3.2 Sensitive Information (App 4)

We only collect personal information that is reasonably necessary for us to carry out the services that we offer to you, and to ensure that we comply with all laws in relation to the provision of insurance.

If we need to collect Sensitive Information (such as information relating to health, disability, ethnic origin, criminal convictions, religious or political affiliation), we will only do so where it is reasonably necessary to perform our functions and will seek your express written consent in advance. Collection of such Sensitive Information is done in accordance with the Australian Privacy Principles.

3.3 How We Collect Information (App 5)

We collect information in a number of ways, including:

- directly from you or your insurance broker or other representative when you provide information (such as an email address and personal details) by sending us a message, email, phone or in documents such as an application or claim forms;
- from third parties such as our related companies, insurance companies and brokers, your medical providers, investigators and assessors, and your representatives;
- information collected and collated from publicly available sources, including search engines, websites, social media, publicly available data bases, third party sources and referees, personal contacts and industry connections;
- from our own records and from claims that you have previously made or been involved in.

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Cookies

A cookie is a small file of letters and numbers downloaded on to a device when the user accesses certain websites.

A cookie will allow a website to recognise a user's device.

A cookie will contain the name of internet location (the domain) from which the cookie has come and the lifetime of the cookie (a cookie will usually expire after a certain period of time).

Two types of cookies may be used on our website:

i. session cookies which are temporary cookies that remain in the cookie file of your browser until you leave the site; and

ii. persistent cookies which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

How we use cookies on our site and what information we collect

Session cookies

We may use session cookies:

- To allow you to carry information across pages of our site and avoid having to re-enter information.

Persistent cookie

We may use persistent cookies:

i. from time to time to help us recognise you as a unique visitor when you return to our website and to monitor your use of our website;

ii. to allow us to link you to any of our affiliates should you come to our website through a paid advert or banner on a website of an affiliate;

iii. to measure traffic patterns and to determine which areas of our website have been visited We use this to research our users' habits so that we can improve our online products and services.

If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

Use of web beacons

Some of our web pages may contain web beacons which allow us to count users who have visited these pages. Web beacons collect only limited information including a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. These beacons do not carry any personally identifiable information and are used to track the effectiveness of a particular marketing campaign.

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4. Why we collect and how we use information (APP 6)

The information we collect depends on the insurance and/or financial products and services that you use or apply for.

4.1 Use of Information

We collect and use information for business purposes with respect to our insurance products and services and other business relations involving our customers. We may use this Information to:

- identify you and to assist you and your broker to clarify any of our relevant services more easily;
- assess and manage your insurance application, policy or any claim that has or may be made by or against you
- consider any application you may make and provide or change the services you require,
- administer and manage those services, including charging, billing and collecting debts;
- gain an understanding of your information and communication needs in order for us to provide you with better, more personalised services that are tailored to your needs;
- inform you of ways the services provided to you could be improved;
- conduct appropriate checks for fraud;
- research and develop our services using third party services;
- maintain and develop our business systems and infrastructure, including testing and upgrading of these systems;
- inform you of matters about which we believe you may have an interest;
- assist statistical, actuarial or research analysis as we consider is necessary for business purposes.
- notify you of our service offerings from time to time; and
- comply with legislative and regulatory requirements.

We also accumulate certain information about your brokers or insurance representatives as may be required or permitted by law.

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4.2 Disclosure of Information

When necessary and in connection with the purposes listed above, we may disclose your personal information to and/or receive personal information from other companies within the SUA group, your insurance broker or our agent, government bodies, loss assessors, underwriters, claim investigators, reinsurers and reinsurance brokers, other insurance companies, mailing houses, claims reference providers, other service providers, hospitals, medical and health professionals, legal and other professional advisers.

The information collected will be used or disclosed by us for the primary purpose for which they are collected and secondary purposes related to those purposes listed above, but only if you would expect us to use or disclose the information for such secondary purpose. However, in the case of Sensitive Information the secondary purpose must be directly related to the purposes listed above.

5. Direct marketing (APP 7)

By accepting our services you expressly permit us and the SUA group of companies to use your Information for our direct marketing purposes and the purposes expressly set out in this policy. You consent to our use of your Information to issue product and professional mail outs by email, fax, social media or letters and undertaking other marketing or service based activities.

If you do not wish to receive any of these materials, please:

- contact our Privacy Officer, whose details are at the end of this Policy, to opt out; or
- follow the prompts in the communication which will provide a method for opting out.

You can change your mind about receiving materials or information about our products and services at any time by contacting us.

You may opt out of any direct marketing service at any time.

We will never sell, license, trade or provide your Information to another person for direct marketing purposes.

6. Cross border disclosure of personal information (APP 8)

We may share your information within the SUA international group of companies. We may use new technologies from time to time and personal information may be stored outside Australia.

However, we will not transfer personal information to a recipient in a foreign country unless we have appropriate protections in place as required by the relevant privacy

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laws. Your information will be stored on our data base for such period of time as required by law.

7. Identifiers (APP 9)

We will use our own identifiers and not those assigned by the government unless we are required to do so, or the Australian Privacy Principles or other another law legislates us to do so.

8. Accuracy of personal information (APP 10)

We will take all reasonable steps to ensure that the information we collect, use and disclose is accurate, up-to-date and complete. Please contact us if there is a change in your circumstances that requires an update to be made to our data.

9. Security of data (APP 11)

How we protect Information

We will take all reasonable steps to protect the information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. When information is no longer needed we will destroy or de-identify it.

We require our employees to protect the confidentiality of information as required by applicable law. Access to information by our employees is limited to administering, offering, servicing, processing or maintaining of our products and services. We also maintain physical, electronic and procedural safeguards designed to protect information. When we share or provide information to other persons or organisations, we contractually obligate them, if required by law, to treat information as confidential and conform to our privacy policy and applicable laws and regulations.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

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

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10. Data breaches

We are aware of and will comply with the Mandatory Data Breach reporting obligations as set out in the Act. Please let us know if you would like to learn more about what steps must be taken when a data breach has been identified.

11. GDPR

We recognise and acknowledge the European Union's General Data Protection Regulation (GDPR). We do not believe the GDPR applies to the majority (if not all) of our operations. However, we are committed to providing a consistent approach to data protection and ensuring the security and protection of personal information and, insofar as the GDPR applies to our operations, we will act in accordance with the requirements of the GDPR.

12. Correction and access to information (APP 12)

You may request access to the personal information which we hold about you and request its correction if you believe it to be incorrect. We can also correct your information if we are satisfied that it is incorrect.

There are some circumstances where we can refuse to give access to Information. These include where given access to the information would:

(a) pose a serious threat to the life, health or safety of an individual or the public,

(b) have an unreasonable impact on the privacy of others; or

(c) be frivolous or vexatious.

The other exceptions are detailed the Australian Privacy Principles.

If you wish to access or correct your Information, please contact SUA at the address shown:

Contact Details

The Privacy Officer
Specialist Underwriting Agencies Pty Ltd
PO Box 324
CLAYFIELD QLD 4011

Ph: 07 3624 9400
Fax: 07 3624 9433
Email: info@sua.com.au

For security reasons, any request for details of information held by us should be made in writing. You may be asked to provide proof of identify.

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13. Complaints

We accept that privacy is a very important issue and will endeavour, at all stages, to comply with their obligations under the *Privacy Act 1988*. We recognise the rights of individuals to complain about alleged mishandling or inappropriate use or disclosure of information. If you have a complaint regarding our management of your privacy you may access our internal dispute resolution (IDR) process by contacting us. We will

(a) use a process that is accessible, flexible and timely and done in accordance with the principles set out in the Privacy Act;

(b) focus on maximising the opportunity for the complainant and SUA to work together to achieve a successful resolution to the complaint;

(c) strive to identify and address any systemic issues that may arise through the lodgement of the complaint and rectify or deal with such issues to prevent their recurrence in the future.

(d) If your complaint is not resolved then you may report the issue to:

Office of the Australian Information Commissioner
GPO Box 2999
Canberra ACT 2601

Telephone: 1300 363 992
Website: www.oaic.gov.au
Email: enquiries@oaic.gov.au

Usually, it takes only a few days to resolve a complaint. However, if we're unable to provide a final response within 30 days, we'll contact you to explain

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mirabelle
UNDERWRITING

Email us
info@mirabelle.com.au

Call us
(02) 4056 1460

Mailbox
PO Box 3510 Erina NSW 2250