

Tokio Marine Australasia Privacy Policy

Dated 1 July 2023

Overview

Tokio Marine is committed to upholding your privacy and protecting your personal information. We are bound by and our policies comply with the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles (APP), along with any other applicable privacy laws and codes.

This Privacy Policy will help you understand how we collect and handle your personal information in order to provide products and services and operate our business. This section provides a summary of the key provisions of our Privacy Policy. For more detailed information see [below](#).

What is Personal Information: Personal information is information or an 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.

Collection and Handling of your Information: We may collect your information when you interact with us, visit our websites, use our products or services or apply for a job with us. Depending on the circumstances, information we collect may include your name, contact details (address, phone and fax number, email address), date of birth, gender and payment details. We take all reasonable steps to ensure that information you provide us is stored securely in physical or electronic form on our systems or those of our third party service providers' systems, both locally and offshore (including cloud based services).

Use: We may use your information:

- to provide products and services to you and respond to your queries;
- to market products or services to you if you've given us your consent to do so
- to assess job applications;
- to comply with laws, regulations and requirements, including our internal policies; or
- to improve our products, services and marketing.

Sharing Your Information: We may share your information with others who help us provide services to you or who act for us (such as insurance brokers or professional advisers), with other companies in the Tokio Marine Group locally and overseas, and with other third parties if you consent to us sharing your information with them. Sometimes we are required to share your information with local or overseas law enforcement agencies, industry bodies, regulators, authorities or external dispute resolution bodies such as the Australian Financial Complaints Authority (AFCA) in the event of a complaint.

Accessing Or Correcting Your Information: You can request access to the information we store about you or ask us to correct or update your information. We may charge a fee for access.

Opting Out: You may opt out of direct marketing at any time. Information on how to do this is provided below.

We may update this Privacy Policy from time to time. We encourage you to periodically review this Privacy Policy on our website so that you will be aware of our current privacy practices. You can contact us for more information at Privacy@tokiomarine.com.au

More Details On How We Handle Your Personal Information

Who we are

We are Tokio Marine Management (Australasia) Pty Ltd ABN 69 001 488 455 (TMMA), the managing agent in Australia for Tokio Marine & Nichido Fire Insurance Co., Ltd ABN 80 000 438 291. References to Tokio Marine Group include all related group companies owned or under the control of Tokio Marine Holdings, Inc. (Related Companies).

Types of Personal Information we collect

We collect Personal Information about our customers and prospective customers, our employees and contractors, (including candidates that apply for a role with us), and contact details of persons from our business partners, suppliers and service providers in a number of different ways including the following:

- when you apply for or purchase our products or services — 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, such as your car registration for car insurance; or
- when you apply for a job with us — your name, contact details (address, phone and fax number, email address), date of birth, gender, education and employment history, professional associations, resume and references, background and police checks. If you are subsequently employed, we may also collect financial details such as your tax file number and bank account details.

We may also collect the following information where needed from time to time:

- proof of identity information, such as your driver licence or other similar identity information;
- information regarding your preferences regarding our products and services;
- details regarding the transactions you undertake in respect of our business; or
- other information necessary to provide you with information regarding our products or services or undertake any transactions or dealings with you.

You may be able to deal with us without providing personal information (such as when making an enquiry). However, if you don't give us information then we may be unable to provide products or services, or your use/access to these products or services may be limited.

Sensitive Information

On occasion we may also collect other kinds of Personal Information as permitted or required by law including sensitive information. 'Sensitive Information' is a subset of personal information and may include among other things; information or an opinion about your religious beliefs, criminal record or membership of professional or trade associations. The kinds of Sensitive Information we may collect generally include the following; (where it is relevant to underwriting an insurance policy or dealing with, managing, or processing a claim):

- criminal record;

- health information;
- past claims history; or
- driving history, certifications and insurance details.

We will only collect and hold such Sensitive Information where reasonably necessary to perform our engagement and with your consent.

How do we collect this information

Unless it is not reasonable or practicable under the circumstances, we will collect information directly from you when you use our website, or when you contact us through telephone, email or online. We may also collect your personal information from:

- your insurance broker, your legal advisors, or your family member who applies for a policy that covers you or is instructed by you to deal with us;
- policy holders or others who are authorised or noted on the policy as having a legal interest in it, including where you are an insured person under the policy but not the policy holder or another insured where the policy is issued in joint names;
- third parties who you have asked to provide your Personal Information to us;
- our Related Companies;
- our agents, authorised representatives, distributors and referrers;
- our service providers (which may also include overseas service providers);
- other insurers and reinsurers;
- people who are involved in a claim or assist us in assessing, investigating, processing or settling claims, including another party involved in the claim or third parties claiming under your policy, your travel consultant/agent, travel service providers, airlines, hotels, providers of transportation, providers of medical and non-medical assistance and services, your employer;
- statutory authorities or government departments, for example, law enforcement;
- external dispute resolution bodies, for example, AFCA, the Office of Information Privacy Commissioner (OAIC) or the Human Rights Commission;
- third party recruitment agencies and service providers, background or police checks, LinkedIn, other third parties you have authorised to deal with us, and from referees you have given us permission to contact;
- our legal or other advisers;
- social media and other virtual communities and networks where people create, share or exchange information;
- clubs, associations, member loyalty or rewards program providers and other relevant organisations;
- publicly available sources of information such as the internet and telephone directories;
- data partners, analytic consultants and other similar organisations;
- agents or subcontractors of any of the above third parties; or
- any other organisation or person where you have consented to them providing your personal information to us or consented to us obtaining your personal information from them.

Are there any other ways we can collect your personal information?

We may also collect information by online means when you visit our public websites or affiliated websites (such as those administered by agents offering Tokio Marine products or services) through the use of cookie technology. You can control and/or delete cookies as you wish. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work. We may otherwise collect personal information from Tokio

Marine or affiliated websites to fulfil your request for products and services and to improve your online experience. We always endeavour to limit the amount of information collected to support the intended purpose of the collection.

We may ask you for some or all of the following types of information when you register for events, request services, manage accounts, access various content and features or directly visit our websites or affiliate websites:

- contact information, such as name, e-mail address, postal address, phone number and mobile number; username, password, password reminder questions and password answers;
- communication preferences, such as which newsletters you would like to receive
- search queries; or
- contact information about others when you refer a friend to a particular site or service; (this information is used solely to facilitate requested communications).

If you provide information about others

If you provide us with information about other individuals (such as employees, dependents etc.) where appropriate, you should provide these individuals with a copy of this Privacy Policy beforehand or ensure they are otherwise made aware of how their information will be used by Tokio Marine.

How can your personal information be used?

We use your personal information in order to provide you with products and services as detailed below. Your information may be used for the following purposes:

- to provide information, products or services you requested;
- to determine your eligibility and process applications for products and services that you have requested;
- to provide information and services as requested by clients;
- to understand and assess your ongoing needs and offer products and services to meet those needs;
- to carry out client communication, service, billing and administration;
- to administer claims and complaints;
- to conduct data analysis, surveys and other evaluations;
- to obtain and update credit information with appropriate third parties, such as credit reporting agencies, where transactions are made on credit;
- to execute monitoring and training for quality assurance purposes and security issues;
- to develop new services;
- to market products and services;
- to conduct processing necessary to fulfil other contractual obligations;
- complying with, and assisting our Related Companies, agents, business partners, distributors and insurance advisers in complying with, any applicable law, code (including the General Insurance Code of Practice) or regulation, and complying with any requests from courts, government departments, law enforcement agencies and regulators, including but not limited to the Australian Prudential Regulatory Authority (APRA) and the Australian Securities and Investment Commission (ASIC); and
- other purposes communicated to you at the time we collected your personal information or as required by law.

Your personal information will also be used by us to consider your applications for employment, (if applicable), and manage the recruitment processes. If you are not successful in obtaining a position with us, we may retain your application and personal information in order to contact you if a suitable position becomes available in the future.

We will only use and disclose your Sensitive Information for the purpose it was collected or for any other directly related purpose that you would reasonably expect us to use it for to the extent permissible under law. With your consent, we may use or disclose your information for additional purposes from time to time.

Who do we share your personal information with?

We may disclose your information to other companies within the Tokio Marine Group and the affiliates or third-party service providers to assist us in providing, managing and administering our services and products including where we outsource certain functions. This may include:

- insurance services and insurance products - business partners, including insurers, reinsurers, insurance agents, insurance brokers, other insurance intermediaries, insurance reference bureaus, medical and health service providers, case managers and rehabilitation consultants, fraud detection agencies, investigators, other advisers such as loss adjusters, lawyers, auditors, actuaries and accountants and others involved in the claim handling process;
- banking and finance products - business partners, including credit and fraud reporting agencies, debt collection agencies, insurers and reinsurers, any Authorised Representatives;
- authorised service providers;
- service providers engaged for outsourced functions such as market research, direct marketing, claims handling and recruitment;
- external IT service providers, infrastructure and other third parties where required by law; and
- entities related to the Tokio Marine Group for the purpose of offering you other products and services, (where you have not elected to opt-out of receiving such information).

Sharing Personal Information Overseas

In accordance with the purposes for which we have collected your personal information, we may disclose personal information to a party located outside Australia such as our affiliated entities, business partners and off shore service providers. The countries where these recipients are located can change from time to time but may include Japan, New Zealand, Singapore, Thailand, United Kingdom, the United States of America and India.

Disclosure may also be made to government, law enforcement, dispute resolution, statutory or regulatory bodies in relevant countries, or as required by law.

We will make every reasonable effort to ensure that we only have business dealings with third parties that value privacy and information security the same way as us and will take reasonable steps to ensure overseas recipients provide the same level of protection for your information using appropriate safeguards such as standard contractual clauses.

Can your information be used for direct marketing?

Unless you notify us otherwise, we may use your personal information to let you know about products and services from across the Tokio Marine Group or our affiliates and business partners that we think may be of interest to you to the extent permitted by law. If you would prefer not to receive marketing you can contact us at Privacy@tokiomarine.com.au to confirm your preference.

How do we hold your information?

We may hold your Personal Information in a number of ways, including:

- in our secure computer systems or databases, which may involve storing data on storage or computer systems provided by third party suppliers;
- in paper records; or
- in telephone recordings.

Where it has been collected from our or your agent, or our service providers, they may also hold copies of your personal information.

Protecting your stored information

While we store your personal information, we take all reasonable steps to protect it by way of appropriate physical, electronic, and procedural safeguards. For example; we implement and impose security measures for access to our systems, operate security measures for our buildings, impose confidentiality requirements on our employees, provide training on keeping personal information secure and keep personal information only for as long as we require it for our business needs or as required by law.

Accessing and correcting information

We take reasonable steps to ensure your personal information that we collect, hold and disclose is accurate, up to date and complete. However, we also rely on you to let us know of any changes or corrections required to your information. You should contact us at any time to update your personal information or advise us that the information we hold is not accurate, up to date or complete. If for any reason we cannot provide you with access, we will provide you with the reason for refusal. In all cases you will be asked to verify who you are before your personal information is provided.

We may also charge you a fee for our reasonable costs of retrieving and supplying the information to you.

Privacy Complaints

If you have any questions or wish to raise a complaint about a breach of this Privacy Policy, you may contact our Privacy Officer directly on the contact details below. We will respond to your question, suggestion or complaint as soon as possible.

Tokio Marine Privacy Officer Contact Details

Attn: Privacy Officer
Tokio Marine & Nichido Fire Insurance Co. Ltd
GPO Box 4616
Sydney 2001 NSW
Telephone: 61 2 92322833
Email: Privacy@tokiomarine.com.au

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 the dispute resolution team who will endeavour to resolve your dispute within 30 days from when you first notified us. If you are still not satisfied with the outcome of your complaint to us, you can contact the Australian Financial Complaints Authority (AFCA) by sending a complaint form to:

Post: GPO Box 3, Melbourne, VIC 3001
Phone: [1800 931 678](tel:1800931678)
Email: info@afca.org.au
Web: www.afca.org.au

Alternatively, you can contact the Office of the Australian Information Commissioner (**OAIC**) by sending a complaint form to:

Post: GPO Box 5218, Sydney, NSW 2001 or GPO Box 2999 Canberra ACT 2601
Fax: [+61 2 9284 9666](tel:+61292849666)
Email: enquiries@oaic.gov.au
Web: www.oaic.gov.au

Please note the OAIC requires any complaint must first be made to the respondent organisation. The law also allows 30 days for the respondent organisation to deal with the complaint before a person may make a complaint to the OAIC.