







## Insurance Australia Group (IAG) - Master Privacy Policy

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### What is a master privacy policy?

As with other large organisations, there are certain activities which we perform across [Our Businesses](#) (listed in Appendix A) and [Our Companies](#) (listed in Appendix B) (**IAG Group Activities**), in addition to the individual activities of each business (**Business Specific Activities**).

In addition to the privacy policies that apply to Business Specific Activities, this Master Privacy Policy applies to:

- any personal information we handle as part of the IAG Group Activities; and
- any other personal information we handle that is not otherwise covered by the privacy policies for the Business Specific Activities.

As such, if you are an individual whose personal information is handled by one of [Our Businesses](#), or you otherwise interact with one of [Our Businesses](#), this Master Privacy Policy should be read in conjunction with the privacy policy for the relevant Business Specific Activities.

*For example: if you are an NRMA Insurance customer, you should read the NRMA Insurance privacy policy first, as that will be most relevant to you, and then read this Master Privacy Policy.*

Whilst we've tried to ensure this doesn't occur, if the information in this Master Privacy Policy conflicts with information in any of the privacy policies for any Business Specific Activities, the information in the relevant privacy policy for the Business Specific Activities will override this Master Privacy Policy.



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### Will this policy change?

We may change this Master Privacy Policy from time to time. If we do so, we will notify you in a manner that we consider reasonably appropriate, including by making the latest revised version of the Master Privacy Policy available on our website at [www.iag.com.au/master-privacy-policy](http://www.iag.com.au/master-privacy-policy). Please review our website periodically for changes to the Master Privacy Policy. You may also obtain a copy of the current version of this Master Privacy Policy by contacting us.

By continuing to hold one of our insurance products, use one of our other products or services (including websites and applications), interact with us or otherwise provide us with your personal information, you agree to us collecting, holding, using, disclosing and otherwise handling your personal information as set out in the current version of this Master Privacy Policy.

If you do not agree with any changes to this Master Privacy Policy, we may not be able to continue providing our products or services to you.

### PART ONE: WHO ARE WE?

Insurance Australia Group Limited is the largest general insurance company in Australia and New Zealand. [Our Businesses](#) sell insurance under many leading brands as well as many other non-insurance products and services.

In this document, the terms "IAG", "we", "our" and "us" refers to Insurance Australia Group Limited ABN 60 090 739 923 and its related bodies corporate, including those outlined in [Appendix B](#).

Any reference to the 'IMA Privacy Charter' or to the 'IMA Privacy Policy' (for example, in an RACV Insurance PDS) is a reference to this Master Privacy Policy.

### Our Group's position on privacy

We value the privacy of your personal information and acknowledge the importance of protecting your personal information. This Master Privacy Policy outlines how we handle your personal information.

If the ownership or control of any of [Our Businesses](#) (including those listed in Appendix A) or [Our Companies](#) (including those listed in Appendix B) changes (or an agreement is entered into to do so), we may transfer and disclose your personal information to the new owner or controller. This includes transferring and disclosing your personal and sensitive information prior to the change of ownership or control. In the event that we enter into an agreement to effect a scheme transfer of an insurance portfolio, we may transfer and disclose your personal information to the new insurer, underwriter and/or distributor prior to receipt of a court order approving the insurance scheme transfer.

This Master Privacy Policy does not apply to your use of any third-party websites. You should check the privacy policies of any third-party websites for information on how your personal information will be handled.



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### PART TWO: WHAT PERSONAL INFORMATION DO WE COLLECT?

#### Can I be anonymous?

You do not have to provide us with your personal information.

However, if you don't it may affect our ability to assist you or provide you with a product or service you would like. If you want to deal with us while not identifying yourself (for example, anonymously or by using a pseudonym) we will let you where it is practical for us to do so (for example, where you make a general enquiry of us).

Please tell us if you wish to do this and we will indicate whether it is practical and reasonable to do so, taking into account the nature of the transaction.

#### What personal information do we collect and hold?

The personal information we collect and hold about you and other individuals (such as your spouse, partner or children) may include:

- general information about you, such as:
  - identity information (name, date of birth, gender);
  - contact details (address, phone or email);
  - information relevant to your employment with, or provision of services to or for, IAG;
  - information that is relevant for our workforce reporting, programs or initiatives (such as your age, sex, gender, gender identity, marital or family status, ability, or other relevant attributes);
  - information relevant to your shareholding in IAG;
  - financial details (credit card number or bank account details (for example, if you are paying for a product or service in this way), transaction history, credit reports); and
  - government identifiers (driver licence number);
- information relevant to providing the products or services we offer, such as:
  - for insurance products and services that you hold or have held:
    - information about assets you have insured;
    - information collected as part of an insurance event (such as a claim), information from any interaction that you may have had with us (including complaints); and



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- information necessary for underwriting the policy (such as your claims history or your driving history) and/or validating the disclosures made as part of an insurance claim; and
- information that we receive from credit providers containing details of products or services you obtained from them following a referral from us (for example, NRMA Home Loans), such as:
  - information about your loan account, including transaction details in relation to the loan;
  - customer details, including general information as noted above as well as information about your marital status, employment (occupation, tenure and income amount) and any dependants that you may have;
  - information about the security for the loan, including the address for the security, the valuation and details of the valuer;
  - information about the insurance on the security and / or the loan; and
- for all products and services generally, other personal information relating to providing the product or service to you, including how you use our products and services (for example, how you interact with us).

We may also collect sensitive information. We will generally only do so where reasonably necessary and where the law allows us or authorises us to do so. Sensitive information may include:

- your health information, for example:
  - where health is relevant to underwriting an insurance policy;
  - where this information is relevant for our workforce reporting, programs or initiatives; or
  - for dealing with, managing, or processing a personal injury claim;
- your COVID-19 vaccination status information, where it may be relevant for:
  - managing the health and safety of our offices, premises or other physical sites; and
  - the performance of work duties;
- your criminal record (for example, where this information is relevant to underwriting an insurance policy or processing a claim); and
- your racial or ethnic origin, and / or sexual orientation (for example, where this information is relevant for our internal human resources regulatory reporting or for relevant workforce programs or initiatives).



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### How do we collect your personal information?

We will collect your personal information directly from you when you interact with us, including via telephone, our websites and online applications, hardcopy forms or email. This information may include how you access, use, and interact with our websites collected via cookies and other similar technologies.

However, there may be occasions where we collect your personal information from someone else or from other entities and sources. This may include collecting your personal information from the entities or sources that are described in [Part 4](#) below.

If we seek to collect personal information from you about someone else (for example, a co-insured or a family member), you must not provide us with information about that person unless they have consented to it or you are required under law to provide us with their personal information. You must also let them know about this Master Privacy Policy, as well as any other privacy policy of the relevant Business Specific Activities and where to find them on our website(s) (as specified in [Appendix A](#)).



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### PART THREE: HOW DO WE USE YOUR PERSONAL INFORMATION?

Generally, we only collect, hold, use and disclose your personal information for the primary purposes for which it was provided to us. These purposes include the following:

- Providing our products and services to you, and managing our relationship with you, including:
  - for insurance products and services:
    - providing you with a quote or considering your application;
    - pricing and underwriting a policy (for example, deciding whether or not to insure you and the terms, including offering any excesses and discounts);
    - issuing, renewing or amending the terms of a product or service (for example, an insurance policy);
    - managing, processing or assessing claims made, including recovering money paid to you or debts that you may have incurred;
  - managing your account, dealing with enquiries, responding to complaints and processing payments you have authorised;
  - reviewing and conducting analytics on your personal information to improve our products and services and to personalise your experience (for example, promoting features of our website relevant to the products you hold with us); and
  - auditing, quality assurance and training.

If you are an individual who interacts with one of [Our Businesses](#) (for example, one of our insurance customers), you should refer to the privacy policy for the relevant Business Specific Activities which describes how we collect, hold, use and disclose your personal information in respect of those Business Specific Activities.

- Maintaining and improving our products and services, including:
  - by using attributes and information relating to assets that you provide to us (for example, the number of bedrooms in your home) to improve our sales processes (for example, by using this information to pre-populate information on future quotes relating to that asset).
- Communicating details about our products and services to you, including:
  - contacting you to respond to your enquiries or complaints;
  - contacting you if we need to provide you with an important update regarding our products and services (for example, if there is major disruption to our service);
  - providing you with assistance you may request of us or that we are otherwise reasonably expected to provide to you; and
  - informing you about other products or services that we think may be of interest to you if you do not opt-out to receive such information.
- Managing our workforce (including our employees, contractors, consultants, third party service providers), including:
  - managing and handling your recruitment or onboarding and any related activities (for example, the collection of your resume, any relevant health information and carrying out criminal and other background checks on you);



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- managing your working relationship with us (for example, the management of your remuneration and performance, or the management of your contracted service provision arrangement);
  - managing and handling your travel arrangements (for example, we may disclose your information to our travel management service providers, their suppliers and other travel and accommodation providers);
  - managing your employment and ensuring the safety, health and wellbeing for you and other members of our workforce;
  - managing our workforce related commitments (for example, we may disclose your information in order to meet our obligations in relation to remuneration, superannuation, tax obligations, fit and proper assessment(s), background and identity checks, shareholding and other relevant matters); and
  - contacting and engaging with our workforce in relation to their employment experience and relevant workplace initiatives leveraging diversity demographics and relevant personal and / or sensitive information (including, but not limited to, your age, sex, gender, sexual orientation, gender identity, marital or family status, ability, ethnicity, race, health or other attributes) that are voluntarily disclosed to us.
- Managing the affairs of [Our Businesses](#) and [Our Companies](#), including:
    - managing investor and shareholder relations;
    - facilitating our business operations (for example, for managing our IT infrastructure including system access, databases, websites and for statistical and maintenance purposes);
    - managing matters relating to corporate affairs and media relations;
    - engaging with entities such as our suppliers, service providers, vendors, professional advisors and other third parties that provide services to us;
    - managing our interactions with regulators, external auditors and law enforcement agencies and government or statutory bodies;
    - complying with legislation, regulation and industry codes that are applicable to our Group and assist government and law enforcement agencies and regulators, including:
      - anti-money laundering, sanctions, and anti-slavery requirements; and
      - identifying instances of criminal activity (for example, fraud and identity theft); and
    - managing the health and safety of our offices and premises (for example, for purposes related to the COVID-19 pandemic).

We may also collect, hold, use and disclose your personal information for another purpose where:

- you would reasonably expect us to do so, because it is related to the purpose for which it was provided to us; or
- the law otherwise allows, authorises or requires us to do so.

In order to carry out the purposes listed above, we may also link, associate, combine and match your personal information with information that we have collected or generated from [Our Companies](#) and with data from other sources. This may include data we acquire from external third parties or from government agencies.

See [Part Four](#) and [Part Five](#) below for more information about who your personal information may be collected from, disclosed to or otherwise shared with.



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### Do we treat sensitive information differently?

Where we collect sensitive information, generally we only collect, hold, use and disclose it for the primary purposes for which it was provided to us – including the same purposes specified above. We will only collect, hold, use and disclose your sensitive information for another purpose where:

- you would reasonably expect us to do so, because it is directly related to the purpose for which it was provided to us; or
- the law otherwise allows or requires us to do so.

### PART FOUR: WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

In order to carry out our functions and activities, including to facilitate our business operations or to provide you with a product or service (see [Part Three](#) above for more information), we may need to share your personal information.

Sharing your personal information may include collecting your personal information from, transferring your personal information to, or otherwise making your personal information visible or accessible to, one or more of the following parties and sources:

- [Our Companies](#) and their agents or distributors (for example, someone who offers you one of our products or services on our behalf);
- our third-party service providers (for example, investigators, recovery agents, lawyers, accountants, professional advisors and consultants, re-insurers, assessors, repairers, suppliers, mailing houses, analytics service providers, marketing agencies, market researchers, physical and electronic storage providers, payment service providers, experts and IT service providers and agents or subcontractors of any of those providers); and
- other external parties, including:
  - our business partners including agents, brokers, referrers, authorised representatives and distributors (for example, Royal Automobile Club of Victoria (**RACV**));
  - organisations that assist us with claims management, claims investigations, loss assessments, risk underwriting, identifying illegal activities, and fraud detection / prevention;
  - a credit provider with an interest in your insured property (for example, a financial institution or a private lender);
  - a credit provider we have referred you to if you expressed an interest in, and / or have obtained, their products or services (for example, Bendigo & Adelaide Bank as the credit provider of NRMA Home Loans);
  - other insurers (for example, to recover monies on a claim you have made);
  - witnesses, passengers, other drivers, another party involved in a claim or another entity who may have relevant information about a claim (for example, to obtain information relevant to our assessment of your claim or to recover monies on a claim you have made);
  - publicly available sources (for example, phonebooks, public websites, registries or social media);
  - auditors (for example, our external auditors if required by the Australian Taxation Office);





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- your family members, friends, brokers or legal representatives (for example, if they contact us with your authority);
- a joint insured on your insurance policy, person listed on an insurance policy (for example, a nominated driver) or anyone else who has your authority;
- individuals that request quotes as part of our sales processes (for example, by pre-populating asset attributes and information when they apply for a quote on the asset);
- statutory authorities or government departments and agencies (for example, ASIC, OAIC or APRA);
- medical practitioners or other professional experts (for example, if your insurance claim involves personal injury); and
- complaint and dispute resolution bodies, such as the Australian Financial Complaints Authority (**AFCA**) (for example, if they contact us about a complaint you make with them).

If the ownership or control of any of Our Businesses (listed in [Appendix A](#)) or Our Companies (listed in [Appendix B](#)) changes, we may transfer and disclose your personal information to the new owner.

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### Do we share personal information with overseas recipients?

We may share your personal information with recipients who are located outside of the country in which you reside.

These overseas recipients are usually located in the following countries:

<u>Asia and the Pacific</u>	<u>Europe</u>	<u>Americas, Africa &amp; Middle East</u>
Australia	Czech Republic	Argentina
Fiji	Finland	Barbados
Hong Kong	France	Bermuda
India	Germany	Brazil
Japan	Hungary	Canada
Malaysia	Italy	Cayman Islands
New Zealand	The Netherlands	Costa Rica
The Philippines	Luxembourg	Israel
Singapore	Poland	South Africa
Sri Lanka	Republic of Ireland	United States of America
Vietnam	Slovakia	
	Switzerland	
	Ukraine	
	United Kingdom	
	Spain	

We would also like you to be aware of the following:

- These countries are in addition to countries listed in any relevant privacy policies for Business Specific Activities (see [Our Businesses](#)).
- We may update the list of countries where these overseas recipients are located from time to time.
- There may be some cases in which personal information is disclosed to countries outside of the ones listed above, such as where:
  - We are requested to make this disclosure, such as part of an ad-hoc request or activity (for example, where an employment referee on your resume, or nominated contact listed on your insurance policy, is located overseas).
  - It is not practical to list all the countries involved (for example, service providers who operate globally who may rely on specialised staff in many regions).



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### PART FIVE: SIGNIFICANT DATA SHARING ARRANGEMENTS

We think that it's important to disclose certain significant data sharing arrangements that exist across IAG.

Arrangement	What is it?	Why do we do it?
Insurance Fraud Bureau of Australia (IFBA)	IFBA is a working element of the Insurance Council of Australia (ICA), established to undertake information collection, sharing and analysis of insurance fraud information that facilitates action against insurance fraud, informs community decision making and law enforcement investigations activity in order to reduce the incidence and impact of insurance fraud on honest policyholders	Our engagement with IFBA may include sharing your personal information, including your personal information and claims history, with IFBA and, through the IFBA, other insurers, for the purposes of assisting us and other insurers with fraud detection and prevention and any other purpose as listed in <a href="#">Part Three</a> above.
Business Partners  <i>including Agents, Brokers, Referrers, Authorised Representatives, and Distributors</i>	Our business partners include any entity that offers you one of our products or services on our behalf or refers you to us.  Our business partners include financial institutions, credit unions and other third parties that may refer you to us to obtain our products or services or where we may provide a product or service under the relevant business partner's brand.	While the exact relationship may vary between each business partner, we will generally share your personal information with these entities in order to sell or arrange the relevant product or service, to maintain and administer that product or service, to resolve any complaints and disputes, to generate business reporting, to pay any relevant commission, to assist those entities with complying with legal or regulatory obligations and for any other purpose as listed in <a href="#">Part Three</a> above.



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### PART SIX: WANT TO CONTACT US?

#### Our contact details

<p>Australia (Customer Relations)</p>	<p>Customer Relations Insurance Australia Limited Reply Paid 89824 Sydney, NSW 2001</p> <p>Phone: 1800 045 517</p> <p>Email: <a href="mailto:customer.relations@iag.com.au">customer.relations@iag.com.au</a></p> <p>Online: <a href="https://www.iag.com.au/contact-us">https://www.iag.com.au/contact-us</a></p>
<p>Australia (Investor Relations)</p>	<p>Phone: +61 (0)2 9292 9448</p> <p>Email: <a href="mailto:investor.relations@iag.com.au">investor.relations@iag.com.au</a></p> <p>Online: <a href="https://www.iag.com.au/contact-us">https://www.iag.com.au/contact-us</a></p>
<p>New Zealand</p>	<p>Online: <a href="https://www.iag.co.nz/contact-us.html">https://www.iag.co.nz/contact-us.html</a></p>
<p>Singapore</p>	<p>3 Temasek Avenue Centennial Tower Level 18-01 Singapore 039190</p> <p>Phone: +65 6499 9125</p> <p>Online: <a href="https://www.iag.com.au/contact-us">https://www.iag.com.au/contact-us</a></p>
<p>Employees and Workforce <i>Including candidates.</i></p>	<p>If you are internal to our organisation, please contact us via People Connect or your people leader.</p> <p>Otherwise, you may contact us via:</p> <p>Phone: +61 (0)2 9082 4455</p> <p>Email: <a href="mailto:peopleconnect@iag.com.au">peopleconnect@iag.com.au</a></p>

#### Access to and correction of your personal information

You can request access or correction of your personal information that we hold by contacting us.

We may ask you to complete a personal information access request form to help us process your request quickly and help us gather information necessary to verify your identity.

There is no charge for requesting access to your personal information, but we may charge you a reasonable amount to cover matters such as retrieving, copying and sending out information.

We will respond to your requests to access or correct your personal information in a reasonable time.



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There are some circumstances in which we are not required to give you access to your personal information. We'll let you know if we are unable to give you access if it is practical and reasonable to do so.

If we do not think that the personal information that we hold about you needs correcting, we'll write to let you know why. You can request that we include a statement to associate with your personal information that states you believe it's inaccurate, out of date or incomplete.

### Complaints

If you have a complaint about our handling of your personal information or an alleged breach of privacy in any jurisdiction in which we operate, please contact us first and provide us with the details of your complaint or the alleged breach as well as any supporting evidence.

We will acknowledge the complaint, investigate it and determine the steps that we will undertake to resolve your complaint, where appropriate. We may contact you if we require any further information and will provide you with our determination once it is made.

If you are unhappy with our determination, we will provide you details on how to take the complaint further, where relevant.

If you remain unsatisfied with how we have handled a privacy issue, you may approach an independent advisor or contact for guidance on alternative courses of action which may be available. You can also contact:

Australia	<p>The Office of the Australian Information Commissioner (OAIC):</p> <ul style="list-style-type: none"><li>• By Post: The Office of the Australian Information Commissioner, GPO BOX 5288, Sydney NSW 2001</li><li>• By Telephone: 1300 363 992</li><li>• By Email: <a href="mailto:enquires@oaic.gov.au">enquires@oaic.gov.au</a></li><li>• Online: <a href="https://www.oaic.gov.au/">https://www.oaic.gov.au/</a></li></ul>
New Zealand	<p>The Office of the Privacy Commissioner (OPC):</p> <ul style="list-style-type: none"><li>• By Post: The Office of the Privacy Commissioner, 8/109 Featherston Street, Wellington 6011, New Zealand</li><li>• By Telephone: 0800 803 909</li><li>• By Email: <a href="mailto:enquiries@privacy.org.nz">enquiries@privacy.org.nz</a></li><li>• Online: <a href="https://privacy.org.nz/">https://privacy.org.nz/</a></li></ul>
Singapore	<p>The Personal Data Protection Commission (PDPC):</p> <ul style="list-style-type: none"><li>• By Post: The Personal Data Protection Commission, 10 Pasir Panjang Road, #03-01 Mapletree Business City, Singapore 117438</li><li>• By Telephone: +65 6377 3131</li><li>• By Email: <a href="mailto:info@pdpc.gov.sg">info@pdpc.gov.sg</a></li><li>• Online: <a href="https://www.pdpc.gov.sg/">https://www.pdpc.gov.sg/</a></li></ul>

**Insurance Australia Group (IAG) - Master Privacy Policy****APPENDIX A – OUR BUSINESSES:**

Our Businesses include those listed in the table below. This table is not intended to be a complete list of Our Businesses and may be updated from time to time.

<u>Our Businesses</u>	
<a href="#"><u>NRMA Insurance</u></a>	<a href="#"><u>AMI</u></a>
<a href="#"><u>SGIO</u></a>	<a href="#"><u>Lantern Insurance</u></a>
<a href="#"><u>SGIC</u></a>	<a href="#"><u>Lumley NZ</u></a>
<a href="#"><u>IAL (Previously Berkshire Hathaway Specialty Insurance Company)</u></a>	<a href="#"><u>NAC</u></a>
<a href="#"><u>Coles Insurance (by IAL)</u></a>	<a href="#"><u>NZI</u></a>
<a href="#"><u>CGU Insurance</u></a>	<a href="#"><u>State Insurance</u></a>
<a href="#"><u>RACV Insurance (by IMA)</u></a>	<a href="#"><u>Swann Insurance (NZ)</u></a>
<a href="#"><u>Swann Insurance</u></a>	<a href="#"><u>Vehicle Repairhub</u></a>
<a href="#"><u>WFI Insurance</u></a>	<a href="#"><u>Cylo</u></a>
<a href="#"><u>Lumley Special Vehicles</u></a>	
<a href="#"><u>ROLLiN' Insurance</u></a>	
<a href="#"><u>ShareCover</u></a>	
<a href="#"><u>Insurance4That</u></a>	
<a href="#"><u>Mums &amp; Co</u></a>	
<a href="#"><u>MotorServe</u></a>	
<a href="#"><u>Ambiata</u></a>	
<a href="#"><u>NTI</u></a>	

**Insurance Australia Group (IAG) - Master Privacy Policy****APPENDIX B – OUR COMPANIES:**

Our Companies include those listed in the table below. This table is not intended to be a complete list of Our Companies and may be updated from time to time.

Name	ABN/NZBN	Name	ABN/NZBN
Insurance Australia Group Limited	60 090 739 923	AssureMe Pty Limited	13 612 773 761
Insurance Australia Limited	11 000 016 722	Helicopter Asset Protection Pty Ltd	70 621 016 528
Insurance Australia Group Services Pty Limited	38 008 435 201	HSC Home Security Pty Ltd	72 639 956 460
Insurance Manufacturers of Australia Pty Limited	93 004 208 084	Vehicle Repairhub Pty Limited	12 632 384 224
CGU Workers Compensation (VIC) Proprietary Limited	41 005 297 781	Empire Equity Australia Pty Ltd	16 136 726 228
CGU Australia Pty Ltd	62 004 478 960	IAG & NRMA Superannuation Pty Limited	77 000 300 934
IAG Asset Management Limited	94 054 552 046	Motorserve Pty Limited	41 121 715 393
IAG International Pty Limited	94 084 509 982	NTI Limited	84 000 746 109
IAG Share Plan Nominee Pty Limited	52 095 125 152	Cylo Australia Pty Limited	29 666 378 909
NRMA Personal Lines Holdings Pty Limited	98 088 394 398	IAG (NZ) Holdings Limited	9429037019662
IAL Life Pty Limited	15 137 509 936	IAG New Zealand Limited	9429039302748
IAG General Holdings Pty Limited	97 620 745 753	First Rescue New Zealand Limited	9429050431144
IAG Ventures Pty Limited	16 615 963 187	Homehub Limited	9429051359423
IAG Agencies Pty Limited	11 147 749 139	IAG NZ Repairhub Limited	9429047272972
Ambiata Holdings Pty Limited	66 600 618 291	LoyaltyHub Limited	9429052162626
Ambiata Pty Limited	87 157 915 396		
Swann Insurance (Aust) Pty Limited	80 000 886 680		