



## AUSTRALIAN PRIVACY POLICY

Last Updated: October 2017

AIG Australia Limited ABN 93 004 727 753 ("AIG Australia" and "we", "us" or "our") is committed to protecting the privacy of the individuals we encounter in conducting our business.

"Personal Information" is information or an opinion about an identified individual such as you or other individuals (such as your dependants) or an individual who is reasonably identifiable, and which is protected by the *Privacy Act 1988* (Cth) ("Privacy Act") and its Australian Privacy Principles.

This Privacy Policy describes how we handle Personal Information that we collect both through:

- our websites ("Sites"), the software applications made available by us for use on or through computers and mobile devices ("Apps"), our social media pages ("Social Media Pages") (the Sites, Apps and Social Media Pages collectively referred to as the "AIG Online Services"); and
- other means (for example, from your insurance application and claim forms, telephone calls, emails and other communications with us, as well as from claim investigators, medical professionals, witnesses or other third parties involved in our business dealings with you).

By using the AIG Online Services, you signify your acceptance of this Privacy Policy.

Please note: This Privacy Policy is supplemented by privacy notices tailored to our specific relationships with you, including privacy notices required under the Privacy Act.

For information about our "AIG Careers Site Policy", please go to. <http://www.aig.com/careers>

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## 1. Who To Contact About Your Personal Information

If you have any questions about our use of your Personal Information you can email [australia.privacy.manager@aig.com](mailto:australia.privacy.manager@aig.com), call us on 1300 030 886 or write to:

**Privacy Manager**  
**AIG Australia Limited**  
**Level 12, 717 Bourke Street**  
**Docklands Vic 3008.**

## 2. Personal Information That We Collect

Depending on your relationship with us (for example, as a consumer policyholder; non-policyholder insured or claimant; witness; insurance broker or appointed representative; or other individual relating to our business), Personal Information collected about you and your dependants may include:

- **General identification and contact information**

Your name; address; email and telephone details; gender; marital status; family status; date of birth; passwords on our systems; educational background; physical attributes; activity records, such as driving records; photos; employment history, skills and experience; relationship to the policyholder, insured or claimant; and date and cause of death, injury or disability.

- **Financial information and account details**

Payment card number; bank account or other financial account number and account details; tax returns, credit history and credit score; assets and liabilities; income and expenses; judgments and civil litigation history; and other financial information.

- **Medical condition and health status**

Current or former physical or mental or medical condition; health status; injury or disability information; medical procedures performed; personal habits (for example, smoking or consumption of alcohol); prescription information; and medical history.

- **Other sensitive information**

In certain cases, we may receive sensitive information about you, including your professional trade or association or union membership, religious beliefs, political opinions (for example, if you apply for insurance through a third party marketing partner that is a trade, religious or political organisation). In addition, we may obtain information about your criminal record or civil litigation history in the process of deciding whether to provide insurance and preventing, detecting and investigating fraud or other crimes. We may also obtain sensitive information if you voluntarily provide it to us (for example, if you provide your driving history or express preferences regarding medical treatment based on your religious beliefs).

- **Identification numbers issued by government bodies or agencies**

In certain limited cases, government identification numbers such as passport number, tax file number or driver licence or other numbers.

- **Telephone recordings**

Recordings of telephone calls to our representatives and call centres.



- **Photographs and video recordings**

Photographs or video recordings (where you are identifiable) created in connection with our insurance or other business activities, including for claims assessment, processing, settlement, and disputes, or for other relevant purposes as permitted by law.

- **Information to investigate or prevent crime, including fraud and money laundering**

For example, insurers commonly share information about their previous dealings with policyholders and claimants for this purpose.

- **Information enabling us to provide products and services**

Location and identification of property insured (for example, property address, vehicle registration or identification number); travel plans; age categories of individuals you wish to insure; policy and claim numbers; coverage/peril details; cause of loss; prior accident or loss history; your status as director or partner, or other ownership or management interest in an organisation; and other insurance you hold.

- **Loan information (for mortgage insurance services)**

Details about property (address and description, and nature of property, whether primary or secondary residence or commercial); purpose of loan; details of loan transaction (for example, purchase price, deposit, loan terms and other financing); default status; and reason for default.

- **Marketing preferences and customer feedback**

You may let us know your marketing preferences, enter a contest or prize draw or other sales promotion, or respond to a voluntary customer satisfaction survey.

- **Social media account and information from Apps**

We may receive certain Personal Information about you when you use our Apps or Social Media Pages, including your social media account ID and profile picture. If you elect to connect any of your other social media accounts to your account(s) on the AIG Online Services, Personal Information from your other social media account(s) will be shared with us, which may include Personal Information that is part of your profile relating to those accounts or your friends' profiles.

- **Information from other sources**

To improve the quality of our products and services, and to carry out research and analysis, we and our service providers may supplement the Personal Information we collect with information from other sources, such as publicly available information from social media services, commercially available sources and information from our affiliates or business partners.

AIG Australia usually collects personal information directly from an individual, from the individual's insurance broker or other appointed representative, in certain cases from websites or other publicly available information or from available searches or information services, and in limited cases, from competitions or from contact lists acquired from other parties.

We cannot usually deal with individuals who do not identify themselves (anonymity) or use a pseudonym such as a nickname. This is usually impracticable, because we need to identify the individual to enter into and administer insurance cover as a binding contract, check an individual is authorised to access or change information we hold and comply with applicable laws.



### **3. How We Use Personal Information**

Depending on your relationship with us and the Personal Information collected, we use Personal Information to:

- Communicate with you and others as part of our business.
- Send you important information regarding changes to our policies, other terms and conditions, AIG Online Services and other administrative information.
- Make decisions about whether to provide insurance and assistance services, and other products and services we offer, and provide such products and services, including claim assessment, processing and settlement; and, where applicable, manage claim disputes.
- Assess your eligibility for payment plans, and process your premium and other payments.
- Provide improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers).
- Prevent, detect and investigate crime, including fraud and money laundering, and analyse and manage other commercial risks.
- Carry out research and analysis, including data analytics and analysis of our customer base and other individuals whose Personal Information we collect as explained in this Privacy Policy.
- Provide marketing information to you (including information about other products and services offered by selected third party partners) in accordance with preferences you have expressed.
- Personalise your experience when using our AIG Online Services or visiting third party websites by presenting information and advertisements tailored to you.
- Identify you to anyone to whom you send messages through the AIG Online Services.
- Allow you to participate in contests, prize draws and similar promotions, and to administer these activities. Some of these activities have additional terms and conditions, which could contain additional information about how we use and disclose your Personal Information, so we suggest that you read these carefully.
- Facilitate social sharing functionality.
- Manage our infrastructure and business operations, and comply with internal policies and procedures, including those relating to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; business continuity; and records, document and print management.
- Resolve complaints, and handle requests for data access or correction.
- Comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering, sanctions and anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities (including those outside your country of residence).
- Establish and defend legal rights; protect our operations or those of any of our group companies or insurance business partners, our rights, privacy, safety or property, and/or that of our group companies, you or others; and pursue available remedies or limit our damages.
- Assess potential or actual job applicants for employment.

### **4. International Transfer of Personal Information**

Due to the global nature of our business, for the purposes set out above we may transfer Personal Information to parties located in other countries (including countries that have a different data protection regime than is found in Australia). For example, we may transfer Personal Information in order to process international travel insurance claims and provide emergency medical assistance services when you are abroad. We may transfer information internationally to our group companies,



service providers, business partners and governmental or public authorities. Further, please note that any communication you send to an "aig.com" email address will be routed through the United States. All transfers are in compliance with the Australian Privacy Principles.

The kinds of Personal Information likely to be transferred and countries include (where applicable):

- for product or claims referral or reporting purposes to other group companies: United States of America, Singapore, and United Kingdom;
- for outsourcing purposes including to other group companies: United States of America, Canada, United Kingdom, Ireland, Belgium, The Netherlands, Germany, France, Malaysia, The Philippines, Hong Kong and India;
- for reinsurance purposes to reinsurers: United States of America, United Kingdom, Belgium, Bermuda and various other countries;
- for claims purposes to other group companies or service providers: New Zealand, Malaysia, The Philippines and the country where the claim occurs;
- for regional processing purposes: New Zealand (in respect of information received from that country and which is processed and returned);
- for mortgage insurance services purposes: United States of America, Bermuda, United Kingdom, Ireland and Hong Kong;
- for job application purposes: Malaysia and United States of America.

## 5. Sharing and disclosure of Personal Information

While making use of your Personal Information, AIG Australia may need to make Personal Information available to:

- **Our group companies**

Other American International Group companies may have access to and use of Personal Information in connection with the conduct of our business where appropriate. AIG Australia is responsible for the management and security of jointly used Personal Information. Access to Personal Information within the group is restricted to those individuals who have a need to access the information for our business purposes.

- **Other insurance and distribution parties**

In the course of marketing and providing insurance and processing claims, AIG Australia may make Personal Information available to third parties such as other insurers; reinsurers; insurance and reinsurance brokers and other intermediaries and agents; appointed representatives; distributors; affinity marketing partners; and financial institutions, securities firms and other business partners.

- **Our service providers**

Subject to any consents required from you, external third party service providers, such as medical professionals, accountants, actuaries, auditors, experts, lawyers and other outside professional advisors; travel and medical assistance providers; call centre service providers, mailing houses and marketing companies, IT systems, support and hosting service providers; printing, advertising, marketing and market research and analysis service providers; banks and financial institutions that service our accounts; third party claim administrators; document and records management providers; claim investigators and adjusters; construction consultants; engineers;



translators; and similar third party vendors and outsourced service providers that assist us in carrying out business activities.

- **Recipients of your social sharing activity**

Your friends associated with your social media account(s), other website users and your social media account provider(s), in connection with your social sharing activity, such as if you connect another social media account to your AIG Online Services account or log into your AIG Online Services account from another social media account. By connecting your AIG Online Services account and your other social media account you authorise us to share information with your social media account provider and you understand that the use of the information we share will be governed by that other social media website's privacy policy. If you do not want your Personal Information shared with other users or with your other social media account provider(s), please do not connect other social media accounts with your AIG Online Services account and do not participate in social sharing using our AIG Online Services.

- **Governmental authorities and third parties involved in court action**

AIG Australia may also share Personal Information with governmental or other public authorities (including, but not limited to, workers' compensation boards, courts, law enforcement agencies, tax authorities and criminal investigations agencies); and third party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our group companies; (f) to protect our rights, privacy, safety or property, and/or that of our group companies, you or others; and (g) to allow us to pursue available remedies or limit our damages.

- **Other Third Parties**

We may share Personal Information with payees; emergency providers (fire, police and medical emergency services); retailers; medical networks, organisations and providers; travel carriers; credit bureaus; credit reporting agencies; and other people involved in an incident that is the subject of a claim; as well as purchasers and prospective purchasers or other parties in any actual or proposed reorganisation, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business, assets or stock.

Personal Information may also be shared by you, on message boards, chat, profile pages and blogs, and other services to which you are able to post information and materials (including without limitation the AIG Online Services). Please note that any information you post or disclose through these services will become public information, and may be available to visitors to the AIG Online Services and to the general public. We urge you to be very careful when deciding to disclose your Personal Information, or any other information, on the AIG Online Services.

## **6. Security**

AIG Australia will take appropriate technical, physical, legal and organisational measures, which are consistent with applicable privacy and data security laws. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of



any Personal Information you might have with us has been compromised), please immediately notify us. (See the “*Who to Contact About Your Personal Information*” section above.)

When AIG Australia provides Personal Information to a service provider, the service provider will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the Personal Information.

If we believe the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we would endeavour to do so as promptly as possible under the circumstances, and, to the extent we have your email address, we may notify you by email.

#### **7. Retention of Personal Information**

AIG Australia takes reasonable steps to ensure that the Personal Information we process is reliable for its intended use, and as accurate, up to date and complete as is necessary to carry out the purposes described in this Privacy Policy. AIG Australia will retain Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

#### **8. Personal Information of Other Individuals**

If you provide Personal Information to AIG Australia regarding other individuals, you agree: (a) to inform the individual about the applicable privacy notice and where applicable content of this Privacy Policy; and (b) to obtain any legally-required consent for the collection, use, disclosure, and transfer (including cross-border transfer) of Personal Information about the individual in accordance with this Privacy Policy.

#### **9. Marketing Preferences**

We will provide you with regular opportunities to tell us your marketing preferences, including in our communications to you. You can also contact us to tell us your marketing preferences or to opt-out by email at [australia.privacy.manager@aig.com](mailto:australia.privacy.manager@aig.com), on 1300 030 886 or by writing to:

**Privacy Manager**

**AIG Australia Limited**

**Level 12, 717 Bourke Street**

**Docklands Vic 3008**

If you no longer want to receive marketing-related emails from AIG Australia on a going-forward basis, you may opt-out of receiving these marketing-related emails by clicking on the link to “unsubscribe” provided in each email or by contacting us at the above addresses.

We aim to comply with your opt-out request(s) within a reasonable time period. Please note that if you opt-out as described above, we will not be able to remove your Personal Information from the databases of third parties with whom we have already shared your Personal Information (ie those to whom we have already provided your Personal Information as of the date on which we respond to your opt-out request). Please also note that if you do opt-out of receiving marketing communications from us, we may still send you other important administrative communications from which you cannot opt-out.



## 10. Access and Correction Requests, and Complaints

You have the right to access your Personal Information on certain grounds and, if applicable, to request its correction. AIG Australia will correct information if it is satisfied that, having regard to a purpose for which the information is held, the existing information is inaccurate, out of date, incomplete, irrelevant or misleading. Please contact us as set out in the *"Who to Contact About Your Personal Information"* section above with any such requests or if you have any questions or concerns about how we process Personal Information. Please note that some Personal Information may be exempted from access or correction in accordance with the Privacy Act.

AIG Australia has established an internal dispute resolution process for handling privacy complaints.

If you feel you have a complaint about our compliance with the applicable Privacy Principles or need help in lodging a privacy complaint, you can contact us as set out in the *"Who to Contact About Your Personal Information"* section above.

Your complaint will be reviewed and you will be provided with a written response. If it cannot be resolved, your complaint will be referred to AIG Australia's Internal Disputes Resolution Committee who will respond within 15 working days. In either case the matter will be reviewed by a person or persons with appropriate authority to deal with the complaint.

If your complaint cannot be resolved by AIG Australia's internal dispute resolution process, you can lodge the complaint with the Office of the Australian Information Commissioner ("OAIC"). You can contact the OAIC via:

<b>Website</b>	<a href="http://www.oaic.gov.au">www.oaic.gov.au</a>
<b>Email</b>	<a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>
<b>Telephone</b>	1300 363 992
<b>Mail</b>	GPO Box 5218, Sydney NSW 1042.

## 11. Other Information We Collect Through Our AIG Online Services

"Other Information" is any information that does not reveal your specific identity, such as:

- Browser information;
- App usage data;
- Information collected through cookies, pixel tags and other technologies;
- Demographic information and other information provided by you; and
- Aggregated information.

We and our third party service providers may collect Other Information in a variety of ways, including:

- **Through your browser or device:** Certain information is collected by most websites or automatically through your device, such as your IP address (ie, your computer's address on the internet), screen resolution, operating system type (Windows or Mac) and version, internet browser type and version, device manufacturer and model, language, internet browser type and version, time of the visit, page(s) visited and the name and version of the AIG Online Services (such as the App) you are using. We use this information to ensure that the AIG Online Services function properly.



- **Through your use of the App:** When you download and use the App, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.
- **Using cookies; online tracking:** Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to recognise your device and to collect information such as internet browser type, time spent on the AIG Online Services, pages visited, language preferences, and country website preference. We may use the information for security purposes, to facilitate navigation, to display information more effectively, to personalise your experience while using the AIG Online Services. In addition, we may use the information to gather statistical information about the usage of the AIG Online Services in order to understand how they are used, continually improve their design and functionality, and assist us with resolving questions about them. Cookies further allow us to present to you the advertisements or offers that are most likely to appeal to you. We may also use cookies to track your responses to our advertisements and we may use cookies or other files to track your use of other websites. If you prefer not to receive cookies, you can adjust your browser to refuse cookies or to warn you when cookies are being used. We do not respond to browser do-not-track signals at this time.

Third parties may collect information about your use of the AIG Online Services and your use of other websites or online services. You can refuse to accept other cookies we use by adjusting your browser settings. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Sites and some online products.

- **Using pixel tags, web beacons, clear GIFs or other similar technologies:** These may be used in connection with some AIG Online Services and HTML-formatted email messages to, among other things, track the actions of users of the AIG Online Services and email recipients, measure the success of our marketing campaigns and compile statistics about Site usage and response rates.

We use for example Adobe's Omniture analytics service, which uses cookies and web beacons to help us understand more about how our website is used by consumers so we can continue to improve it. Adobe does not have the right to use the information we provide to them beyond what is necessary to assist us. For more information on Adobe's services, including how to opt out, go to <http://www.adobe.com/privacy.html>.

- We may use interest-based advertising service providers to customise, target, serve and report on AIG advertisements served across the web and mobile applications, based on information relating to our offline interactions with you, our online interactions with you (on any of your devices) and information received from third parties. To do this, these service providers may use cookies, pixel tags and other technologies to collect information about your and other users' use of the AIG Online Services and third party sites and mobile applications. They may also use these technologies, along with information they collect about your online use, to recognise you across the devices you use, such as a mobile phone and a laptop. Our service providers may also match personal information we provide to them with your IP address and serve AIG advertisements to you across the web, based on your IP address. If you would like to opt out of having your information used for these purposes, visit the self-regulatory program opt-out pages at [www.aboutads.info/choices/](http://www.aboutads.info/choices/) or



[www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) to opt out in desktop and mobile web browsers on the particular device from which you access the opt-out options. Download the AppChoices app at [www.aboutads.info/appchoices](http://www.aboutads.info/appchoices) to opt out in mobile applications.

- **Using your Physical Location:** We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device's physical location to provide you with personalized location-based services and content. We may also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalised content and to study the effectiveness of advertising campaigns. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you choose to deny such uses and/or sharing, we and/or our marketing partners may not be able to provide you with the applicable personalised services and content. In addition, we may obtain the precise geolocation of your device when you use our mobile applications for purposes of providing travel or other assistance services to our clients who are enrolled in such services. In connection with providing travel or other assistance services, we may share your device's precise geolocation information with our clients and other entities with whom we work. You may opt-out of our collection and sharing of precise geolocation information by deleting the mobile application from your device, by disallowing the mobile application to access location services through the permission system used by your device's operating system, or by following any additional opt-out instructions provided in the privacy notice available within the mobile application.
- **Using information provided by you:** Some information (for example, your location or preferred means of communication) is collected when you voluntarily provide it. Unless combined with Personal Information, this information does not personally identify you.
- **By aggregating information:** We may aggregate and use certain information (for example, we may aggregate information to calculate the percentage of our users who have a particular telephone area code).

Please note that we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then, in addition to the uses listed in this "*Other Information We Collect*" section, we may use and disclose Other Information for all the purposes for which we use and disclose Personal Information.

## 12. Third Party Privacy Practices

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site to which the AIG Online Services link. The inclusion of a link on the Site does not imply endorsement of the linked site by us or by our group companies.

Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organisations, such as Facebook, Apple, Google, Microsoft, RIM or any other software application developer or provider, social media platform, operating system or wireless service provider, or device manufacturer, including any Personal Information you disclose to other organisations through or in connection with the Apps or our Social Media Pages.



### **13. Changes to This Privacy Policy**

We review this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements. We will place updates on our website.

Please take a look at the "*LAST UPDATED*" date at the top of this Privacy Policy to see when it was last revised.