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Level 1 / 297 Vincent St, Leederville WA 6007  
PO Box 231, Leederville WA 6903  
P 08 9224 9555

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104 Hannan St, Kalgoorlie WA 6430  
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## Privacy Policy

At Surefire Insurance Brokers Pty Ltd (**Surefire**) we are committed to protecting your privacy in accordance with the Australian Privacy Principles (APP). This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws and how you can access the personal information we hold and how to have that information corrected.

### What information do we collect and how do we use it?

When we arrange insurance on your behalf, we are subject to certain legislative and regulatory requirements which necessitate us to obtain personal information about you, including the Corporations Act 2001 (Cth).

We may ask you for the information we need to advise you about your insurance needs and management of your risks. This can include a broad range of information ranging from your name, address, contact details, age to other information about your personal affairs including your assets, personal belongings, financial situation, health and wellbeing. Sensitive information such as information about your health and criminal history may need be collected where relevant to the services we are providing you.

We will generally collect your information directly from you, but in some cases we may collect it indirectly from a third party e.g. your professional adviser/agent. Before we collect information from a third party, we will ask for your consent to do this and you have a right to refuse us.

We provide any information that the insurers or intermediaries who we ask to quote for your insurances and premium funding require to enable them to decide whether to insure you and on what terms or to fund your premium and on what terms.

Insurers may in turn pass on this information to their reinsurers. Some of these companies are located outside Australia. For example, if we seek insurance terms from an overseas insurer (e.g. Lloyd's of London), your personal information may be disclosed to the insurer. If this is likely to happen, we inform you of where the insurer is located, if it is possible to do so.

When you make a claim under your policy, we assist you by collecting information about your claim. Sometimes we also need to collect information about you from others although you have a right to refuse us authorisation to do this. We provide this information to your insurer (or anyone your insurer has appointed to assist it to consider your claim, e.g. loss adjusters, medical advisers etc) to enable it to consider your claim. Again this information may be passed on to reinsurers.

We also use your information to send you requested product information and to enable us to manage your ongoing requirements, e.g. renewals, and our relationship with you, e.g. invoicing, client surveys etc. We will do so electronically e.g. via email and links to download documents, unless you tell us that you do not wish to receive electronic communications.

From time to time, we will use your contact details to send you direct marketing communications including offers, updates and newsletters that are relevant to the services we provide. We always give you the option of electing not to receive these communications in the future. You can unsubscribe by notifying us and we will no longer send this information to you. We may also use your information internally to help us improve our services and help resolve any problems.

### **What if you don't provide some information to us?**

We can only fully advise you and assist in arranging your insurance or with a claim if we have all relevant information. The insurance laws also require you to provide your insurers with all the information they need in order to be able to decide whether to insure you and on what terms. You have a duty to disclose the information which relevant to the insurer's decision to insure you.

You can deal with us anonymously or by a pseudonym where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

### **When do we disclose your information overseas?**

If you ask us to seek insurance terms and we recommend an overseas insurer, we may be required to disclose the information to the insurer located outside Australia e.g. if we recommend a policy provided by Lloyd's of London, your information may be given to the Lloyd's broker and underwriters at Lloyd's of London to make a decision about whether to insure you.

We will tell you at time of advising on your insurance if they are overseas and in which country the insurer is located. If the insurer is not regulated by laws which protect your information in a way that is similar to the Privacy Act 1988, we will seek your consent before disclosing your information to that insurer.

Australian and overseas insurers acquire reinsurance from reinsurance companies that are located throughout the world, so in some cases your information may be disclosed to them for assessment of risks and in order to provide reinsurance to your insurer. We do not make this disclosure, this made by the insurer (if necessary) for the placement for their reinsurance program.

We may also disclose information we collect to the providers of our policy administration and broking systems that help us to provide our products and services to you. These policy administration providers and broking systems may be supported and maintained by organisations in New Zealand, the Philippines and Vietnam and your information may be disclosed to those organisations. Please note that the Privacy Act and Australian Privacy Principles may not apply to these organisations.

### **How do we hold and protect your information?**

We strive to maintain the reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information as soon as possible; and
- update us with any changes to your personal information as soon as possible.

We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

We hold the information we collect from you on our computer system. Any paper records are disposed of securely once they have been electronically imaged and stored on our network. In some cases, your file may be archived and sent to an external data storage provider for a period of time. We only use storage providers located in Australia who are also regulated by the Privacy Act.

We ensure that your information is safe by protecting it from unauthorised access, modification and disclosure. We maintain physical security over our paper and electronic data and premises, by using locks and appropriate security systems. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers passwords and multi-factor authentication to control access to computer systems where your information is stored.

### **Will we disclose the information we collect to anyone?**

We do not sell, trade, or rent your personal information to others.

We may need to provide your information to contractors who supply services to us, e.g. to handle mailings on our behalf, for compliance and audit purposes, external data storage providers or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. We may also disclose information we collect to the providers of our policy administration and broking systems that help us to provide our products and services to you. However, we will take reasonable measures to ensure that they protect your information as required under the Privacy Act.

Disclosure of any sensitive information collected only occurs for the purposes for which you gave it to us e.g. applying for an insurance policy, or directly related purposes you would reasonably expect or if you agree to the disclosure e.g. to assist with a complaint.

We may provide your information to others if we are required to do so by law, you consent to the disclosure or under some unusual other circumstances which the Privacy Act permits.

### **How can you check, update or change the information we are holding?**

Upon receipt of your written request and sufficient information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information please write to one of our Privacy Officers, at the contact details stated below.

We do not charge for receiving a request for access to personal information or for complying with a correction request. We do not charge for providing access to personal information however we reserve the right to charge a fee should there be any resultant work that comes from accessing this information. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

In some limited cases, we may need to refuse access to your information, or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal in writing.

## Our Website

**Anonymous data** – We use technology to collect anonymous information about the use of our website, for example when you browse our website our service provider logs your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our website, to better understand our clients and markets and to improve our services.

**Cookies** – In order to collect this anonymous data we may use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. Once you leave the site, the cookie is destroyed and no personal or other information about you is stored.

**Forms** - Our Website allows visitors to submit information via Self-Service forms. The information submitted via the Forms is not encrypted. It is sent to our offices via email and is also stored on a database which is accessible by our staff and contracted service providers only (password protected).

An option is available for certain forms to be downloaded in PDF format for sending in via mail. Should you be concerned about confidentiality of the information, this would be the recommended method.

## What happens if you want to complain?

We welcome your questions and comments about privacy. If you have concerns about whether we have complied with the privacy requirements or this Privacy Policy when collecting or handling your personal information, please contact:

Attention: Privacy Officer  
Telephone: (08) 9224 9555  
Mail: PO Box 231, Leederville WA 6903  
Email: [admin@surefireib.com.au](mailto:admin@surefireib.com.au)

Your complaint will be considered by us through our internal disputes resolution process and we will respond with a decision within 30 days of you making the complaint. Further information on this process is available via our [Complaints Guide](#) on our website or from our office. We will provide you with information concerning referring your complaint to the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au) if we cannot resolve your complaint.

## Your consent

*By asking us to assist with your insurance needs, you consent to the collection and use of the information you have provided to us for the purposes described above.*