

Privacy Policy

At Steadfast Life, we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). This 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, how you can access the personal information we hold about you and how to have that information corrected.

What is personal information?

Personal information is any information or opinion about a person whose identity is apparent, or whose identity can be reasonably ascertained, from the information or opinion. Common examples of personal information are a person's name, telephone number, email or home address and employment details.

What personal information do we collect and hold?

We collect and hold the personal information necessary for us to provide you with the services you have requested, that is, to advise you on and arrange insurance on your behalf and to manage insurance claims.

We will ask you for the personal information we need to advise you about your insurance needs and management of your risks. This is likely to occur when you enquire about our services, during our Fact Find process, when you complete your insurance application and when you complete supplementary medical or financial questionnaires. We will collect a broad range of personal information ranging from your name, address, contact details and age to other information about your personal affairs including information about your assets, financial situation, health and well-being.

When you make a claim under your policy, we will need to collect personal information relating to your claim in order to assist with the claim. Sometimes we also need to collect personal information about you from others.

What about sensitive information?

Some personal information we hold is 'sensitive' and subject to greater restrictions. Sensitive information relates to a person's racial or ethnic origin, political opinions or membership of political bodies, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or activities, criminal record, state of health and medical history.

Some sensitive information is usually needed for applications for life insurance products and to manage claims on those products (eg. health information). We will collect, use and disclose sensitive information only for the purposes for which it was provided, unless you agree otherwise or the use or disclosure of this information is allowed by law. Documents asking for sensitive information will explain this.

How do we collect your personal information?

We generally collect personal information directly from you online, through application forms, over the telephone, through email or in person. We will, where possible, only collect personal information about you from you.

On some occasions we may collect personal information about you from another person or entity (eg. someone who refers you to us, or where you are covered by, or are life insured, under a policy that covers more than one person or is taken out by someone you know). If we have collected personal information about you from someone else, we will take reasonable steps to ensure that you are or have been made aware of this.

You must not provide us with personal information about another person unless you have clear consent from that person to do so. If you provide personal information to use about another person, you need to ensure that they are aware:

- + That you have provided their personal information to us,
- + Of who we are and how they can contact us,
- + That they may access the personal information that we hold about them, and
- + Of the purpose for which you provided their personal information to us.

We also recommend that you refer them to this Privacy Policy and where to find it.

For what purposes do we hold, use and disclose your personal information?

We mainly collect, hold, use and disclose your personal information for the purpose for which it was provided to us, or for any other purposes for which you have consented, or where we are authorised or required to do so by law.

We may collect, hold, and use your personal information to:

- + Advise you about insurance,
- + Assist you to complete your insurance application,
- + Contact you about matters relating to you or services provided to you,
- + Answer your enquiries,
- + Manage your insurance claims,
- + Meet internal functions such as administration, accounting and information technology system requirements,
- + Tell you about other products or services (including those of third parties),
- + Refer you to other organisations (eg. to another life insurer if your needs are not suited to our services),
- + Practice effective risk management and prevent fraud,
- Conduct marketing, research and statistical analysis,
- + Resolve complaints, breaches, incidents or litigant matters, and
- + Conduct customer surveys.

We may disclose your personal information to:

- + Insurers from whom we obtain quotations and to whom we recommend you apply for insurance,
- + NobleOak or Lifebroker, if we refer you to them for assistance,
- + In the event of a claim, anyone your insurer has appointed to assist it to consider your claim (eg. loss adjustors, medical brokers), and
- + Other companies or individuals who assist us in providing our financial services, perform services on our behalf or regulate the financial services that we provide.

We will not collect, hold, use or disclose sensitive information about you for any purpose other than the primary purpose of collection or a directly related secondary purpose unless you have provided us with your consent to such use or disclosure.

We also use your information to enable us to manage your ongoing requirements and our relationship with you (eg. financial reporting, invoicing, client surveys). We may do so by mail or electronically unless you tell us that you do not wish to receive electronic communications.

We may also use your information internally to help us improve our services and help resolve any problems.

Direct marketing

From time to time, we will use your contact details to send you direct marketing communications about products and services that we believe will be of interest to you. We will always give you the option of electing not to receive these communications in the future. You can unsubscribe at any time by notifying us that you wish to do so by contacting us on 02 8456 7866 or by sending an email to info@steadfastlife.com.au.

What if you don't provide information to us?

If you do not provide us with some or all of the information that we ask for, we may not be able to fully advise you or assist in arranging your insurance or with managing a claim. The insurance laws also require you to provide your insurers with 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 is relevant to the insurer's decision to insure you.

How do we hold and protect your personal information?

We strive to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. 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 electronically in our client management system or as a paper file.

We ensure that your information is safe by protecting it from loss, unauthorised access, destruction, misuse, modification and disclosure. This includes:

- + Physically securing our premises,
- + Maintaining computer and network security such as user identifiers and passwords to control access to computer systems,
- + Restricting access to your personal information to employees or those who perform services on our behalf who are authorised to handle your personal information and on a needs to know basis,
- + Entering into confidentiality agreements with relevant employees and third parties,
- + Appropriate staff training, and
- + Taking reasonable steps to destroy or de-identify personal information that is no longer needed.

Will we disclose the personal information we collect to anyone?

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

We will disclose your personal information to insurers and may need to provide your information to contractors who supply services to us eg. to handle mailings on our behalf, external data storage providers or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. However, we will take all reasonable steps to ensure that they protect your information in the same way that we do.

We may also 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.

We may disclose your personal information to other companies or individuals both here and overseas who assist us in providing our financial services, perform services on our behalf or regulate the financial services that we provide. Australian insurers may acquire reinsurance from reinsurance companies that are located outside Australia, 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 but it is made by the insurer (if necessary) for the placement for their reinsurance.

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

You may request access to your personal information and ask us to correct it at any time.

We take reasonable steps to ensure the personal information we collect and hold about you is accurate, complete and up to date. However, we also rely on you to advise us of any changes to your personal information or corrections required to the information we hold about you. Please let us know as soon as possible if there are any changes to your information or if you believe the information we hold about you is not accurate.

We will, on written request, provide you with access to 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 our Privacy Officer at Steadfast Life Pty Ltd, Suite 510/46 Kippax Street, Surry Hills NSW 2010 or email info@steadfastlife.com.au. We may charge you a service fee for retrieving and sending the information to you.

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.

Cookies

A 'cookie' is a packet of information that allows the server (the computer that houses the website) to identify and interact more effectively with your computer. When you use one of our websites, we send you a cookie that gives you a unique identification number. A different identification number is sent each time you use one of our websites. Cookies do not identify individual users, although they do identify a user's browser type and your Internet Service Provider (ISP). You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Please refer to your browser instructions or help screens to learn more about these functions. If you reject all cookies, you may not be able to use our websites. To evaluate the effectiveness of our website advertising, we may use third parties to collect statistical data. No personal data is collected on these occasions.

Anonymity and pseudonymity

If you are subject to the Australian privacy regime, you have the option of not identifying yourself or of using a pseudonym unless we are required or authorised under Australian law or a court/tribunal to identify you, or it is impracticable to deal with you anonymously or by a pseudonym.

What happens if you want to complain?

If you have any concerns about whether we have complied with the Privacy Act, the Australian Privacy Principles or this Privacy Policy, please write to our Privacy Officer at:

Steadfast Life Privacy Officer Suite 510/46 Kippax Street SURRY HILLS NSW 2010

T 02 8456 7866

E info@steadfastlife.com.au

Your complaint will be considered by us through our internal complaints resolution process and we will try to respond with a decision within 30 days of you making the complaint.

If you are dissatisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC). OAIC can be contacted on:

T 1300 363 992

E enquiries@oaic.gov.au

W www.oaic.gov.au

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.

Changes to our Privacy Policy

We reserve the right to review and amend this Privacy Policy from time to time, particularly to take into account any changes to legislative or regulatory requirements. Updated versions will be made available on our website or are available free of charge on request.

We will review this Privacy Policy from time to time, in order to consider new laws and technology, changes to our operations and practices, and to make sure our Privacy Policy remains appropriate.

Tell us what you think

We welcome your questions and comments about privacy. If you have any concerns, or complaints, please contact our Privacy Officer at the contacts details given above.

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