



Privacy and Spam Policy

Avoca Group Pty Ltd (Avoca) values the privacy of personal information; we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth).

About our Privacy Policy

This Privacy Policy outlines how we manage personal information. It applies to any personal information you provide to Avoca Insurance Brokers and any personal information we collect, use, disclose, or handle about individuals from other sources in accordance with;

- Privacy Amendment (Private Sector) Act 2000
- Corporations Act 2001

It does not apply to our employee records, which are not subject to the specified Acts.

What Information we collect and how we collect it

We collect personal information to offer, provide, manage and administer the services and products we can provide. These include insurance broking, claims management, risk management consulting and other forms of insurance related services.

We also collect personal information to be able to develop and identify products and services that may interest you, conduct market or customer satisfaction research, develop, establish, and administer arrangements with other organisations in relation to the promotion, administration and use of our products and services.

We generally collect personal information directly from the relevant individual but in some cases we may collect it indirectly from a third party. Where we collect information from a third party, you have a right to refuse us authorisation to do this.

Who we disclose personal information to

We have a duty to maintain the confidentiality of our clients' affairs, including personal information. Our duty of confidentiality applies except where disclosure of personal information is with our client's consent or when disclosure of personal information is to government or regulatory bodies as required by law.

We may also disclose personal information to third parties who we believe are necessary to assist in providing, managing and administering the services we provide and products we are involved in. For example:

- For insurance broking and general insurance products – insurers, reinsurers, other insurance intermediaries, surveyors and loss adjusters;
- Our strategic partners who may wish to tell you about their services, products or promotional opportunities which may be of advantage to you, unless you tell us not to;

- Your representatives such as your lawyers, accountants, financial advisors etc;
- Premium funders; and
- Potential purchaser/organisations involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer of all or part of the assets of our business.

Should you wish not to receive any direct marketing material from us or our strategic partners as referred above, please contact us with this request. We maintain a register for those individuals not wanting direct marketing material to ensure your request is fulfilled, which we will endeavour to do within 5 working days of receiving your request.

Security of your personal information

We strive to maintain the reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. Your personal information may be stored in hard copy documents, as electronic data, or in our software or systems. We endeavour to protect any personal information that we hold from misuse and loss, and to protect it from unauthorised access, modification and disclosure.

We ensure that your information is safe by having secure offices, facilities and coded records. Our computer system has sound safeguards such as network and communications security restricting unauthorised access.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

Your sensitive information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or a criminal record. This is subject to some exceptions including where the collection is required by law or when the information is necessary for the establishment, exercise of defense of a legal claim.

Keeping information up to date and accessing it

We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date whenever we collect, disclose or use it. However, if you wish to gain access or to correct your personal information please write to your Account Manager and/or Avoca's Privacy Officer.

Your request to provide information will be dealt with in a reasonable time and we may recover from you our reasonable cost of supplying you with this information.

Some exceptions exist where we will not provide you with access to your personal information and if this should happen, we will provide you with a written explanation for that refusal.

Is full information required?

We can only fully advise you 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.

Where lawful and practicable to do so you can deal with us anonymously e.g. general inquiries about the services we can offer you.

Our Website

You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database. We take care to ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data encryption.

If you do not wish to receive any further information from us, or you wish to update your registration details, please email your request to us. We will endeavour to meet your request within 5 working days.

Our website utilises cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

Electronic Communications and Spam

Spam is a generic term used to describe electronic 'junk mail'- unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages' which may include emails, instant messaging, SMS and other mobile phone messaging, but does not cover normal voice-to-voice communication by telephone.

Avoca Insurance Brokers complies with the provisions of the Spam Act when sending commercial electronic messages. Equally importantly, Avoca makes sure that our practices are in accordance with the National Privacy Principles in all activities where they deal with personal information. Personal information includes our clients contact details.

The following are three key steps Avoca Insurance Brokers adheres to:

- Consent – only commercial electronic messages are sent with the addressee's consent which may be either express or inferred consent.
- Identify – electronic messages will include clear and accurate information about the entity that is responsible for sending the information.
- Unsubscribe – a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

Avoca Insurance Brokers ensures that commercial communications that include a forwarding facility contain a clear recommendation that the recipient should only forward the communication onto persons with whom they have a relationship and where that relationship means that person could be said to have consented to receiving communications.

Where the content of a commercial communication seeks to promote or inspire interaction with a product, service or event that is age sensitive, we take reasonable steps to ensure that such content is sent to recipients who are legally entitled to use or participate in the product service or event.

How to contact us

If you have any concerns or complaints, please contact:

Avoca's Privacy Officer: Charles Elders

Unit 12, 339 Cambridge Street

Wembley WA 6014

Phone: (08) 9387 8588

Fax: (08) 9387 8577

Email: celders@avoca.com.au

Your query or complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Privacy Commissioner.

For more detailed information on privacy see <http://www.privacy.gov.au>