



# **INFORMATION HANDLING POLICY**

**November 2010**

## Who We Are

In this Information Handling Policy, references to 'we', 'our', 'us' and 'ClearView' refers to ClearView Financial Management Limited, ClearView Life Assurance Limited and ClearView Life Nominees Pty Limited.

## Your Privacy

This document sets out how we deal with your personal information. We respect the privacy of any personal information we collect about you. We are bound by the Privacy Act 1988 and other applicable privacy laws.

## Definitions

Financial service includes the provision of financial products such as life insurance, superannuation, managed investments and the provision of financial planning and investment advice.

## Why does ClearView collect personal information?

We collect your personal information (personal information is as defined in the Privacy Act 1988 and includes sensitive information) so that we can provide you with financial services, and so that we can continue to operate an efficient and sustainable business.

## What kinds of personal information does Clearview hold?

The type and amount of information we hold will depend on whether you have been a customer or have made an application to be a customer and the extent to which you have used our services. If you apply to be, are, or have been a customer, the personal information we may hold about you includes:

- name, address, gender, marital status, contact details and date of birth;
- payment details;
- records of service contacts such as voice recording of telephone conversation;
- census and statistical-type information for purposes including product development and risk assessment;
- Auto-Pay and direct debit/credit details;
- claims details such as date, amount claimed and amount paid;
- tax file number;
- details of the financial service or product you applied for and details of any financial products you have invested in (including account details);
- your financial interests and sometimes your financial position;
- occupation;
- your employer details;
- your tax file number; and
- for insurance products – certain medical, family and lifestyle information.

Generally, we do not hold personal information about non-customers except those people who have contacted us for further information about our products or services, or where a customer provides information to us about another person. We may also hold information about persons who have been designated to pay or act on behalf of ClearView customers.

## Sensitive Information

If you apply for certain products or services or if you make a claim under certain products, we may need to collect sensitive information about you. For example, depending on the product, this may include your health information. This is collected and used only in accordance with the National Privacy Principles and this policy.

## How does ClearView collect personal information?

To provide the best products and services to suit your needs, we collect information from you when you:

- complete an application form for one of our products;
- contact us in person, by phone or online; and
- lodge a claim.

Though we try to collect information about you directly from you, sometimes we might also collect information about you from another person or entity. For example, if we wish to perform risk assessment on our membership base, census, survey and statistical-type data from external providers.

Further examples include:

- there is more than one person on the policy and information is collected about each of them; or
- we may collect information about you from medical providers or other professional experts in order to provide you with a policy or assess a claim.

If you provide information to us about another person, then you need to tell that other person that you have done so, who we are, that they may access their personal information, and you may want to refer them to this policy.

## Insurance Policy

Information about dependants (spouse or partner and children) on insurance policies is collected from the Policyholder or with the authorisation of the Policyholder. For example, we collect this information when the Policyholder completes an application form or when a claim is made.

We collect information on dependants on the policies with the consent of the Policyholder. If you are a dependant over 16 years when the Policyholder lodges a claim on your behalf, we assume they have your consent to give us all the information necessary to process the claim.

The reverse of this is that, if you are the Policyholder and you provide us with information about a dependant on the policy, we expect that you have that person's permission to give us the information and that you have told them you have given the information to us. Information collected during the course of the policy is also available to the Policyholder.

## How does ClearView use my information?

We use your personal information to provide, manage and administer your health policy and the financial services to you, to evaluate and pay claims, and to operate an efficient and sustainable business.

As part of those processes, we may collect, use and disclose your information to:

- process your application;
- process payments, withdrawals and redemptions;
- investigate and assess any claim;
- contact you about matters relating to you, financial services provided to you or our other services (these services may change from time to time);
- answer your enquiries;
- meet internal functions such as administration, accounting and information technology systems;
- practice effective risk management and prevent fraud;
- monitor, price and evaluate products and services;
- conduct marketing, research and statistical analysis;
- resolve complaints;
- report to and obtain information from regulatory authorities;
- reinsurers;

- third party assessors of underwriting or claims;
- auditors and other service providers we may appoint to ensure the integrity of our operations;
- any person acting on your behalf, including your financial adviser, executor, trustee and attorney; and
- conduct customer surveys.

### **When will ClearView use my information to contact me?**

We use personal details to contact you about official notices advising of changes to your financial services and other purposes related to the products and services we provide to you. We might contact you about other services from ClearView and other companies that may be of interest to you (unless you notify us that you do not want us to communicate this information to you). These notices may be through the ClearView Viewpoint magazine.

### **Receiving marketing material**

From time to time, we will provide you with information about products and services from our group of companies or other affiliate organisations that we consider of potential benefit to you and your family. We may share your personal information on a confidential basis to our related entities so that they can offer you products and services.

You can choose not to receive marketing material and we ask that you contact us to exercise this choice. Please understand that there could be a delay of up to 60 days before your request is fully implemented, and we apologise if you receive marketing material in this time. You will find details on how to contact us at the end of this policy.

### **How will ClearView disclose my personal information?**

We may need to disclose your information to others to provide you with financial services and to operate an efficient and sustainable business when performing the following kinds of services:

- marketing, research and statistical analysis;
- IT development and maintenance;
- accounting and auditing services;
- claims assessment and processing such as medical professionals,
- claims assessors and lawyers; and
- customer surveys.

It is our policy that, where customer information is disclosed, contractors and service providers agree to be bound by the Privacy Act. We may also be required under law to disclose your information to someone else or to a government authority. We do not sell personal information to anyone.

In the course of providing you with our products and services, some of the organisations to which we may disclose your personal information (including our related entities and related bodies corporate, and state and government agencies) are located outside New South Wales in other states or territories in Australia. ClearView may send your personal information to them, including electronically transmitting data. When we do so, we require them to handle your personal information in the same way we do and will do everything reasonable to ensure your personal information is kept secure from unauthorised access or disclosure.

### **What other legislation affects ClearView's use and disclosure of personal information?**

In some circumstances, the collection, use, disclosure and access of personal information is governed by specific legislation. Where there is specific legislation, this will generally govern how we use the information despite the provisions of the Privacy Act 1988. For example, for certain financial services products, we are required to collect your tax file number and provide that information to the Australian Taxation Office.

### **How does ClearView keep my information secure and for how long is it kept?**

We take all reasonable steps to ensure that your personal information is kept secure and is retained for the period for which it is needed. We ensure that your personal information is kept secure and is protected from misuse or unauthorised disclosure by ensuring that authorisation processes are followed for allocation of system rights to employees. Your information is kept as long as we need it to provide the products and services you requested from us and, in some circumstances, to comply with statutory requirements.

### **Can I access my personal information?**

You can ask us for access to information we hold about you at any time. Call ClearView on 132 623 and ask for a request form to be sent to you to complete. We are committed to handling your request properly and promptly, so all requests for access are handled in our head office.

We will endeavour to meet your request for access. However, access to some information may be denied, including where:

- we no longer hold or use the information;
- we cannot disclose the information because of legal proceedings or a court order;
- disclosing the information would unfairly prejudice the privacy of another person;
- the request is frivolous or vexatious; and
- where access would pose a threat to the life or health of the customer.

We will tell you the reasons why we cannot give you access to the information you have requested when we respond to your request.

There is no charge for making a request for access or for obtaining a summary document of the information we hold containing the following information:

- customer's name, address and birth date;
- contact details;
- level of cover;
- details of the products held;
- date of joining; and
- bank account details.

There is a charge for access to any other information and you will need to put your request in writing. The charge is restricted to recouping our costs of providing the information to you - for example, the cost of photocopying, document retrieval, labour and delivery to you.

### **Correction of records**

You can ask us to correct the information we hold about you if the information is out of date or inaccurate. We will amend your record or, where we disagree with the change you request, we will give you a reason and put a note on your record that you disagree. ClearView may also correct the information it holds about you if we become aware it is out of date or inaccurate.

### **How do I make an enquiry or complaint about a breach of privacy?**

You can make an enquiry or a complaint about our handling of your personal information at any time by contacting the Privacy Officer as set out below. We will generally require you to set out your complaint in writing.

**The Privacy Officer  
GPO Box 4232, Sydney NSW 2001  
Phone 132 623**