

### Open and transparent management of personal information

Coles Car, Home and Landlord Insurance is issued by WFI Insurance Limited (we, us, our), part of Insurance Australia Group. Your privacy is important to us and we're committed to ensuring that information we hold about you is held securely and that your confidentiality is protected.

We're bound by the Australian Privacy Principles (APPs) of the Privacy Act 1988 (Cth). We're committed to ensuring all our business dealings comply with the APPs, and we acknowledge the importance of keeping your personal details confidential and secure.

Questions about the APPs may be directed to the Office of the Australian Information Commissioner whose website details are: [www.oaic.gov.au](http://www.oaic.gov.au) and telephone number is: 1300 363 992.

We're committed to the APPs and support:

- fair, transparent and open collection practices;
- processes that ensure personal information is accurate, complete and current;
- your right to see, and where necessary, correct the personal information we hold about you; and
- limiting the use of your personal information.

This Privacy Policy explains how we treat personal information that we hold about you. It details the type of personal information we collect, how we may use that information, who can access it and how we protect it.

### Collection of solicited personal information

We collect information which is reasonably necessary to provide our services for underwriting and administering your insurance, claims handling, market and customer satisfaction research and to develop and identify products and services that may interest you. We collect information only by lawful and fair means.

We collect information about you (such as your name and contact details) and other people who you've asked us to include under your insurance policy, details of the risk that you've asked us to insure, information about your previous claims or losses, details of your previous insurances and insurers, your credit status and any matters we need to be able to make a decision about whether to offer or provide insurance to you. If you need to make a claim under your policy, we'll also collect information about the event giving rise to your claim.

We may collect personal information from you when you interact with us to apply for our products or services, when you renew an existing product or service and when you need to make a claim or have other enquiries about the products and services you have with us. We may do this by telephone, email, facsimile, through our online service, by post, by using service providers (for example, our call centre operators), and in person from you.

We may also collect personal information from a third party if it's unreasonable or impractical for us to collect it from you. This may include:

- other insurers,
- related entities, your credit institution about any loan you have in relation to the risk we've insured,
- another party involved in a claim,
- investigators,
- family members,
- anyone you have authorised to deal with us on your behalf, and/or our legal advisers.

You should be particularly aware that we may consider it necessary to arrange for investigators to collect personal information about you in relation to a service or product we have provided to you. The investigators collect this information on our behalf and they may share it with us. They are also bound by this privacy policy and the Privacy Act 1988 (Cth) when they perform these services on our behalf.

At the time we collect your information, or as soon as practical after, we'll notify you or make sure you're aware of our identity, contact details, the purposes for which we collected the information, the consequences of not providing your personal information to us, how you can access and correct the information, and whether we'll disclose your personal information to our service providers who are based overseas and the countries in which they're located.

Regardless of how we collect your personal information, we'll be fair and open and we won't make any unreasonably intrusive enquiries.

### Use and disclosure of solicited information

We may disclose your personal information to companies in the Insurance Australia Group, our agents, authorised representatives, local and overseas service providers, other insurers, reinsurers, mailing houses and document service providers, financial institutions, auditors, insurance and claim reference agencies, recovery agents, credit agencies, lawyers, accountants, loss assessor and adjusters, financial or investigative service providers, internal dispute resolution officers and dispute resolution providers such as the Financial Ombudsman Service Australia.

We use and disclose your personal information for the purposes of providing insurance, administering your insurance policy, claims handling and dispute resolution. We may also use your personal information to improve our products and services.

We won't use or disclose your personal information for other purposes unless you've given us your consent. There are circumstances where we may use or disclose your personal information for purposes other than those mentioned above. We'll only do this if you'd reasonably expect us to and the other purpose is related to the purposes we've described above. In addition we may disclose personal information if we're required to or we're permitted by law.

We also collect your information so that we and our related companies and business alliance partners can offer you services and products that we believe may be of interest to you. You can always opt out of receiving such communications by contacting us.

### Dealing with unsolicited personal information

If we receive personal information even though we didn't ask for it, then within a reasonable period after we've received it we'll decide if it's information we could have lawfully collected by asking you for it. If we decide we couldn't have asked you for the information, we'll destroy or de-identify it if it's lawful and reasonable to do so.

### Disclosure to overseas recipients

Some of the organisations we use to assist us in providing you with our products and services are located overseas. If we share your personal information with an organisation that's located outside of Australia we'll ensure it's handled in accordance with this Privacy Policy and the Privacy Act 1988 (Cth).

We may disclose your personal information to our call centres in South Africa or the Philippines, an information technology centre in India and a customer survey service in New Zealand. The location of our overseas service providers may vary from time to time. Our online Privacy Policy is regularly updated with any changes and you can access it at [www.wfi.com.au/privacy](http://www.wfi.com.au/privacy).

### Data quality and security

We'll take such steps as are reasonable in the circumstances to ensure the personal information we collect is accurate, up to date, complete and protected from unauthorised access, misuse, modification, interference or loss.

Your information is stored only in secured premises and on protected electronic databases. The databases are password and access-level protected. Access to personal information is only available to those of our staff who need it to carry on one of our functions or activities.

### Access and correction

You can ask us for access to your personal information by contacting us on the details below. If you ask us to, we'll correct your personal information if it's inaccurate, incomplete or out of date. We'll respond to a request to access or correct your personal information within a reasonable time.

If you've asked for access to your information, we'll try to provide this to you in the manner you've requested. This is unless we're entitled to refuse to provide access.

If we correct your personal information, we'll confirm this with you. And if we decline your access request or don't amend your personal information, we'll provide you with our reasons together with details about how you can access our internal dispute resolution process.

### Identifiers

We use our own identifiers and not those assigned by the government. This is unless we're required to do so, or the APPs or another law permit us to do so.

### Anonymity and pseudonymity

You have the option of not identifying yourself or using a pseudonym if it's possible for us to deal with you on this basis.

But if you want to purchase a product or service from us, it generally won't be possible for you to deal with us anonymously or under a pseudonym. This is because your identity is one of the key factors we take into account to decide whether to offer you an insurance policy. Your identity is also important when we assess the terms on which we're willing to offer you insurance, and at what premium. Further, under the Insurance Contracts Act 1984 (Cth) you have duty of disclosure and your identity is a material factor to disclose.

### Complaints

If you have a complaint about how we manage your privacy you may access our internal dispute resolution (IDR) process by contacting us. Before we refer complaints to our IDR process, please contact us and request a resolution. We'll try to resolve the matter within one business day. If we can't resolve your complaint within the day, it will be referred to one of our managers. If the manager is unable to resolve the matter within a further five business days, then you can ask the manager to refer your matter to the IDR Officer. The IDR Officer then has a further 15 business days to make a decision.

When we make our decision we'll also tell you about your right to take your matter to the Office of the Australian Information Commissioner (OAIC) in case you're not satisfied with the outcome. At this time, we'll also give you contact details and the time limit for applying to the OAIC. Also, if you haven't received a response of any kind to your complaint within 30 days, or you are dissatisfied with the response, then you have the right to take the matter to the OAIC.

The OAIC is the statutory body given the responsibility of complaint handling under the Act. The OAIC is independent and will be impartial when dealing with your complaint. The OAIC will investigate your complaint, and where necessary, make a determination about your complaint, provided it is covered by the Privacy Act 1988 (Cth). You have 12 months from the date you became aware of your privacy issue to lodge your complaint with the OAIC. The contact details of the OAIC are:

#### Office of the Australian Information Commissioner

**Address:** GPO Box 2999, Canberra ACT 2601  
**Telephone:** 1300 363 992  
**Website:** [www.oaic.gov.au](http://www.oaic.gov.au)  
**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

You also have a right in limited circumstances to have your privacy complaint determined by the Financial Ombudsman Service (FOS) Australia. The FOS can determine a complaint about privacy where the complaint forms part of a wider dispute between you and us or when the privacy complaint relates to or arises from the collection of a debt.

The FOS is an independent dispute resolution body approved by the Australian Securities and Investments Commission. We're bound by FOS' determinations, provided the dispute falls within the FOS' Terms of Reference, but you're not so bound. You have two years from the date of our letter of decision to make an application to the FOS for a determination. You can access the FOS dispute resolution service by contacting them at:

#### The Financial Ombudsman Service Australia

**Address:** GPO Box 3, Melbourne Victoria 3001  
**Telephone:** 1300 780 808  
**Website:** [www.fos.org.au](http://www.fos.org.au)  
**Email:** [info@fos.org.au](mailto:info@fos.org.au)

### Further information

If you'd like more details about our Privacy Policy, would like to seek access to or correct your personal information, or opt out of receiving materials we send, please contact us on 1300 265 374. You can also view a copy of our current Privacy Policy on our website at [www.wfi.com.au/privacy](http://www.wfi.com.au/privacy) or write to our Customer Relations team as follows:

**Email:** [Customer.relations@iag.com.au](mailto:Customer.relations@iag.com.au)  
**Free call:** 1800 045 517  
**Free fax:** 1800 649 290  
**Mail:** Customer Relations, Reply Paid 62759 Sydney NSW 2000  
 Free post (no stamp required)