

Privacy Policy

1. Purpose

The purpose of this policy is to ensure Roobyx adheres to the Privacy Act 1988 (Cth) and subsequent amendments, including Australian Privacy Principles. These standards are designed to protect the privacy and information submitted to us from our clients and customers. This policy is also designed to minimise the potential exposure to ROOBYX from the loss of sensitive or confidential data, intellectual property, damage to public image etc., which may follow from unauthorised use of ROOBYX resources.

2. Scope

This policy applies to employees, contractors, consultants, temporaries, and other workers at ROOBYX, including all personnel affiliated with third parties.

3. Policy

What is Personal Information

Personal Information is any information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.

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

The personal information we generally collect and hold may include a name, address, age or date of birth, information specific to the insurance, superannuation or other financial products and services which are applied for or which we provide the product or service. For some of our products and services, we may also collect and hold sensitive information, including information or an opinion about a person's health or a disability, memberships of professional or trade associations and criminal record.

For employment applications, we collect and hold a name, address, contact details, employment history, qualifications and experience, references and names and contact details of referees.

How personal information is collected and held

The method by which personal information may be collected will depend on the nature of the insurance and services being provided. We may collect personal information in writing, by email, by facsimile, through information submitted via our online services and verbally in person and by telephone.

In some circumstances, we may obtain personal information from third parties claiming under a policy, publicly available sources such as the internet, claim administrators, claim assessors, investigators, expert witnesses, witnesses, medical service providers, financial services providers, law enforcement officers and statutory and regulatory bodies. This will generally be to clarify or assess information that provided on application forms or when making a claim on a policy provided on the product provided to a client or customer.

Personal information is held in secure environments including computer systems and databases, paper records and telephone recordings. We may utilise related companies, agents and third party suppliers for data storage services.

IP Address and Cookies

We may collect information about computers, including where available internet protocol (IP) address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about a person's general internet usage by using a cookie file which is stored on the hard drive of that person's computer. Cookies contain information that is transferred to a person's computer's hard drive. They help us to improve our Website and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern;
- To store information about a person's preferences, and so allow us to customise our Website according to individual interests;
- To speed up a person's searches, and to

- To recognise a person and when they return to our Website.

A person may refuse to accept cookies by activating the setting on their browser which allows them to refuse the setting of cookies. However, if they select this setting they may be unable to access certain parts of our Website. Unless they have adjusted their browser setting so that it will refuse cookies, our system will issue cookies when they log on to our Website.

Why we collect, hold and use personal information

We only collect personal information where it is reasonably necessary for one or more of our functions or activities, such as assessing the risk and administering the insurance policy, pay a claim or providing superannuation or other financial products and services or assessing an individual for employment. Only personal information necessary for the provision of these services and for the conduct of our business will be collected.

Where the personal information is sensitive such as health and medical information, we will also obtain the persons consent before collecting the information unless we are permitted by law or an exception under the Act applies.

If a person does not consent to provide us with the personal information that we request, or withdraw their consent to the use and disclosure of personal information at any stage, we may not be able to offer them the products or provide the services that they seek.

From time to time, we may use contact details to send users direct marketing communications including offers, updates and newsletters that are relevant to the services we provide. We always give a person the option of electing not to receive these communications in the future. They will have the ability to unsubscribe by notifying us and we will no longer send these communications.

Who we may disclose personal information to and why

Personal information will only be disclosed to third parties where the disclosure is reasonably required to provide a person with insurance and insurance related services, superannuation and other financial products, to conduct our business, or for any of the purposes outlined in this Privacy Policy. Personal information for the purposes outlined may be shared on a confidential basis with our related entities, insurers, reinsurers, agents, superannuation funds, banks, clearing houses and

service providers. For example, this may include anyone we or the insurer has appointed to assist us or the insurer to consider a claim, for example loss adjusters, investigators, lawyers, medical professionals, repairers and suppliers, an employer, other insureds and interested parties under your insurance, external data storage providers, our advisors, statutory and regulatory bodies.

Disclosure to overseas recipients

In some instances, our service providers and related companies to which we disclose personal information may be located overseas. The countries in which these service providers and related companies are located may vary from time to time, but include the United Kingdom.

Where personal information has been disclosed to an overseas recipient, there is a possibility that in certain cases that recipient may be required to disclose it under a foreign law. Where this occurs, such disclosure is not a breach of the Act.

Our insurers, financial institutions and other third parties who are in Australia may disclose your personal information overseas in accordance with the provisions of their privacy policies.

Where a person applies for employment with us, we may disclose their personal information to related companies, agents and service providers, and to insurers and reinsurers who may be in the United Kingdom.

Consent

Where a person has asked us to provide them with insurance, superannuation or other financial products and/or related services, their consent to the collection, use and disclosure (including overseas disclosure) of the personal information is provided to us for the purposes described in this Privacy Policy.

Where a person applies for employment with us, their consent to the collection, use and disclosure of the personal information is provided to us for the purposes described in this Privacy Policy.

Personal information about others

Where a person provides personal information about others, they represent to us that they have made them aware that they will do so, including the types of third parties we may disclose it to,

the purposes we and such third parties will use it for, how they can access it and how complaints about privacy may be made. Where a person provides sensitive information about others, they represent to us that they have obtained their consent on these matters. If they have not or will not do so, we must be advised before they provide the sensitive information.

Accessing and seeking correction of personal information

We will take reasonable steps to ensure that the personal information we hold about a person is accurate, complete, relevant, and up-to-date and is not misleading when it is collected, used or disclosed. A person may contact us to request access to their personal information that we hold at any time, and request us to correct any errors in that information. When making a request to access their personal information, we will carry out a verification process in order to determine that the information is not accessed by other individuals.

How we store personal information

We store personal information in our computer systems and data bases and take reasonable precautions to ensure the security of all personal information is adequate to protect it from being used or disclosed for any other purposes other than the provision of our products and services.

We maintain physical security over our electronic data stores and premises by using locks and security systems. We also maintain computer and network security by utilising firewalls, user identifiers and passwords to control access to computer systems where personal information is stored.

How a person can contact us or make a complaint

Where a person requires further information about how we manage your personal information, wish to request access to or correction of their personal information, they should contact the Privacy Officer, using the contact details set out at the end of this Policy.

If a person contacts us and is not satisfied with our response, they may be able to refer the matter to the Financial Ombudsman Service, subject to its Terms of Reference, or to the Office of the Australian Information Commissioner.

Contact details

Roobyx Pty Ltd

Privacy Officer
Level 5, 320 Adelaide Street
Brisbane QLD 4000
Email: info@roobyx.com

Financial Ombudsman's Service Limited

GPO Box 3
Melbourne VIC 3001
Phone: 1800 367 278
www.fos.org.au

Office of the Australian Information Commissioner

GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
www.oaic.gov.au

4. Policy Compliance

Compliance Measurement

We may make changes to this Privacy policy from time to time for any reason. The revised version will be available on our website.

Exceptions

None.

Non-Compliance

Any risk failure or breach of this Privacy Policy requires immediate notification to the Privacy Officer and Managing Director.

5 Related Standard, Policies and Process

- Privacy Statement on website
- Acceptable Use Policy
- Server Security Policy
- Password Protection Policy
- Workstation Security Policy

6 Definition and Terms

Reference should be made to

- Privacy Act 1988
- Australian Privacy Principles (APPs), Schedule 1, of the Privacy Amendment (Enhancing Privacy Protection) Act 2012

7 Revision History

Date of Change	Responsible	Summary of Change
April 2017	Operations	Updated and converted to new format.