

## Who are we?

HDI Global Specialty SE is a non-life insurance company registered in Germany and the Australian Branch is authorised in Australia by the Australian Prudential Regulation Authority.

## Policy Statement

HDI Global Specialty (including its Branches) is committed to treating customers fairly by placing them at the heart of what it does and providing the highest standard of products and services. The Board of Directors and senior management have ensured that HDI Global Specialty delivers fair outcomes for customers by establishing a customer centric culture. As such its staff in the Australian Branch are committed to ensuring that all customer personal information is handled in accordance with the principles of the Privacy Act 1988 (the Privacy Act) and, where applicable, State or Territory legislation in relation to health information. The Privacy Act sets out the requirements for Companies with regard to their handling of your personal information.

## What types of personal information do we collect?

We collect personal information, including sensitive information.

'Personal information' means information or opinion about an identified individual, or an individual who is reasonably identifiable.

'Sensitive information' is personal information and includes information about an individual's health, genetics, race, political opinion or membership, religion, philosophical beliefs, union membership, sexual orientation and criminal record.

Examples of the types of personal information which we collect include but are not limited to name, address and contact details, date of birth, gender, health information, claims history, criminal records, driving records and credit history records.

## Collecting your personal information

We collect personal information, including sensitive information, relating to claims made on insurance policies. We collect personal information for the purpose of assessing applications for insurance and administering insurance policies, including any claims.

We collect this information in a number of ways. Sometimes we will collect this information directly from you. However, we normally collect this information from agents, insurance brokers and other insurance intermediaries.

Your personal information is collected by us with your consent, which is generally obtained during the application and/or renewal of your insurance cover and/or during any claims process, or as otherwise permitted by law.

## Using and disclosing your personal information

We can only use and disclose your personal information for the purpose it was collected, unless the use or disclosure for another purpose is with your consent or otherwise permitted by law.

### We may disclose your personal information to:

- Our related corporate entities for the purpose of performing our functions or corporate reporting. These related entities may be located overseas in any of the countries in which HDI Global Specialty operates including, but not limited to, Germany and the United Kingdom.
- Service providers and third parties to carry out activities on our behalf such as claims handling services or providing IT services to us.
- Other entities within our group, reinsurers (who may be located overseas), insurance intermediaries, insurance reference bureaux, credit reference agencies, our advisers, our agents, our administrators and those involved in the claims handling process (including assessors, investigators and others), for the purpose of assisting us and them in providing relevant services and products, or for the purpose of recovery or litigation.
- People listed as co-insured on your policy and to family members or agents authorised by you.

## Protecting your personal information

We hold your personal information on databases and physical files. We take all reasonable steps to securely retain any information we hold. This includes through the use of passwords and other security measures. We also maintain security procedures to manage and protect the use and storage of paper records containing personal information. We regularly review our systems to ensure they are effective at keeping your personal information secure.

### Access to your personal information

Generally, we will provide you with access to any information we hold about you on request.

In limited circumstances, however, access may be refused if required or permitted by law. For example, you may be refused access to your personal information which relates to:

- anticipated or existing legal proceedings and that information could not be subject to a process of discovery,
- information regarding our negotiations with you,
- legal advice we have received in relation to your claim,
- where providing access poses a serious threat to life, health or safety or if access may have an unreasonable impact on the privacy of other individuals.

If we refuse to provide you access to your personal information, we will explain to you why in writing.

We do not charge an application fee to access your personal information, but may charge a reasonable fee for giving you access including photocopying cost.

If you would like to have access to your information or to correct personal information we hold about you, please make the request in writing using the contact details provided at the end of this policy.

## Notifiable Breaches

HDI Global Specialty – Australian Branch has established a Data Breach Notification Scheme, to ensure that affected individuals are notified about serious data breaches.

A data breach occurs where personal information held by an organisation is lost or subjected to unauthorised access or unauthorised disclosure of AND this event is likely to result in serious harm to an individual:

- Financial harm that could allow identity theft or fraud (e.g. Loss of financial data, credit card information, etc.)
- Any other harm that, if the information was disclosed, could be deemed sensitive by that person and may subject them to discriminatory treatment, humiliation or damage to their reputation (e.g. health and other private information)
- Harm may be physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation

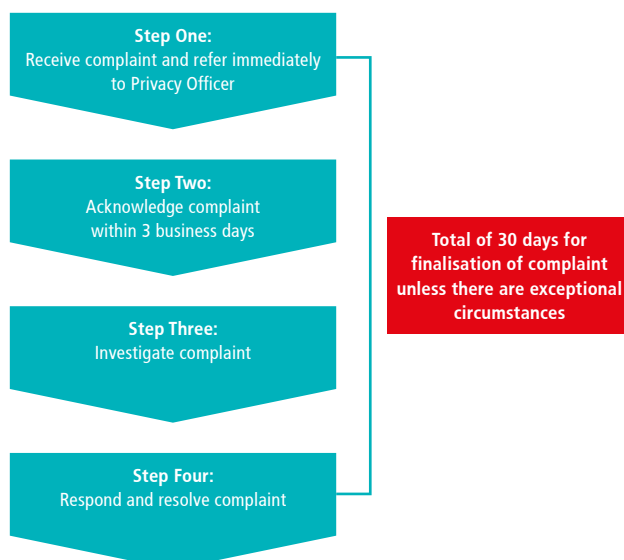
### What happens after a breach?

If a breach occurs we must, within 30 days of any breach or data loss, notify all affected customers and the Government Privacy Commissioner and disclose the information involved. We must also advise the affected customers what they should do to protect themselves.

## Complaints

We will address any complaints you have about our handling of your personal as set out below. You will receive an acknowledgment that we have received your complaint and the matter will then be referred for investigation by a person not directly involved in the subject matter of the complaint. Unless there are exceptional circumstances, we aim to resolve the investigation and complaint within 30 days.

### Process for addressing Complaints regarding a Breach of Privacy



### The acknowledgment will include the following information:

- the complaints process
- the contact person and details
- the expected timeframes,
- confirmation of the complaint being made and
- any further information required from the complainant.

During the investigation the investigator may request further information from the complainant and/or other persons with information relevant to the subject matter of the complaint.

At the end of the investigation, the complainant shall be advised in writing of:

- The outcome of the investigation including the reason for that finding. This includes specifying the relevant parts of the applicable legislation on which the finding is based.
- The proposed resolution.

If it is found there was a breach of Australian privacy law, options for resolving the complaint include:

- Offering an apology.
- Explaining how we will be developing or amending policy/procedure.
- Training/education for employees where appropriate

The Privacy Officer will communicate the decision and outcome of the investigation and complaint no later than fifteen (15) Business Days from receipt of the Complaints Documents. If the Privacy Officer and/or investigator is unable to make a decision within this timeframe the Complainant will be made aware of the circumstances.

Complaints where the Complainant remains dissatisfied with the response are to be escalated to the Senior Officer Outside Australia, the Head of Compliance and the Data Protection Officer to adjudicate on the matter.

All final written responses should set out that if the complainant is not satisfied with our response a complaint may be made to the Office of the Australian Information Commissioner at:

**GPO Box 5218 Sydney NSW 2001**  
**Ph +61 2 9284 9666**  
**Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)**

## Register

A Privacy Complaints register is to be maintained by the Branch with all new Privacy complaints being entered into the Register and updated once a decision has been made and communicated.

### Contacting us

If you wish to contact us about the handling of your personal information, accessing or correcting your information or to make a complaint, please contact:

**Privacy Officer**  
**HDI Global Specialty Australian Branch**  
Tower 1, Level 40, Suite 40.03, 100 Barangaroo Avenue,  
Sydney NSW 2000  
Tel +62 2 8373 7580  
E-mail address: [PrivacyAustralianBranch@hdi-specialty.com](mailto:PrivacyAustralianBranch@hdi-specialty.com)