

PRIVACY POLICY

Catholic Church Insurances Limited is committed to handling your personal information in accordance with the National Privacy Principles. The adoption of these principals supports our management philosophy that promotes mutual trust, respect, equity and fair treatment for all our clients.

We are committed to ensuring that all our business dealings comply with the National Privacy Principles and acknowledge the importance of keeping personal details confidential and secure.

We also support:

- fair and open collection practices
- processes that ensure information is accurate, complete and current
- clients rights to see and where necessary correct information about themselves
- limiting the use of information

There are ten Principles relating to client Information Privacy;

1. Collection of personal information
2. Use and disclosure
3. Data Quality
4. Data security
5. Openness
6. Access and correction
7. Identifiers
8. Anonymity
9. Transborder data flow
10. Sensitive information

1.0 COLLECTION OF PERSONAL INFORMATION

Catholic Church Insurances will only collect information that is necessary for following purposes:-

- assessing applications for insurance
- change of risk on renewal
- processing a claim
- establishing a central contact for a Client group

We will be fair in the way we collect personal information.

We will ensure a business practice where Catholic Church Insurances or its agents **do not**

- a) Collect or use spent conviction information outside the terms of the relevant law
- b) Telephone or call an individual late at night
- c) Insist on interviewing an individual when it is obviously inconvenient

Catholic Church Insurances or its agents **will not** unless we have the clients consent

- d) Record conversations
- e) Approach an individual about their claim in their workplace or in public

Catholic Church Insurances or its agents **will**

- f) respect confidentiality
- g) guard against casual disclosure of what may be sensitive information
- h) provide a private room for interviews
- i) notify an individual if IRS checks are carried out
- j) Seek consent from an individual if a credit is required to be carried out

When collecting personal information we will make the client **aware of:**

- a) the identity of Catholic Church Insurances and how to contact us
- b) the fact that clients can gain access to their information
- c) the purpose for which the information is being collected
- d) to whom Catholic Church Insurances discloses this information
- e) any law that requires information to be collected
- f) the main consequences (if any) for the client if information is not provided eg.
 - we may reduce the amount of a claim
 - we may cancel the contract
 - we may void the contract.

We will, where practicable, collect personal information directly from the client.

Where we collect information about the client from someone else (eg reinsurer, agent or assessor), we will, wherever possible, make sure the client knows we have done this.

2.0 USE AND DISCLOSURE

Catholic Church Insurances will not use or disclose personal information for a secondary purpose unless it is related to the primary purpose or where the client would expect us or has consented for us to use or disclose the information.

Where personal information is used for direct marketing purposes the client will have the opportunity to decline to receive any further direct marketing approach.

We will remove a client from a contact/ mailing list upon their request.

We will only use or disclose personal information for a purpose other than the primary purpose if we suspect unlawful activity or where we are required by law that we do so.

3.0 DATA QUALITY

We will take all reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and current.

4.0 DATA SECURITY

Catholic Church Insurances will ensure that the personal information entrusted to us is secure from misuse and loss and from unauthorised access, modification or disclosure.

Access to client information will be restricted to those authorised staff who require access to carry out our primary or secondary purpose.

When personal client information is no longer required it will be disposed of securely in accordance with our guidelines.

5.0 OPENNESS

Catholic Church Insurances will maintain and review clearly expressed policies on our management of personal information.

We will take reasonable steps, on request, to let clients know what sort of personal information we hold, for what purposes, and how we collect, hold, use and disclose that information.

6.0 ACCESS AND CORRECTION

All information concerning our clients is to be considered confidential. Catholic Church Insurances will not convey any information contained in our records to any unauthorised person.

We will provide clients with access to personal information on request except where it:

- a) poses a threat to life or health
- b) would have an unreasonable impact upon the privacy of others
- c) would be unduly onerous for Catholic Church Insurances
- d) is frivolous or annoying
- e) would be likely to prejudice investigation of possible unlawful activity
- f) would be unlawful
- g) denial of access is allowed by law
- h) relates to legal proceedings
- i) would damage national security

Where information is commercially sensitive we may provide an explanation rather than provide direct access. eg. general rate increase.

If we deny you access to any personal information about you we will provide you with reasons in writing.

Where a client is not happy that we have declined to provide information they can use our internal disputes resolution process.

Where a client is asked to pay for the preparation and retrieval of their personal information the cost is to be fair and reasonable.

We will take all reasonable steps to ensure that information is correct, accurate and current.

Where there is a disagreement between Catholic Church Insurances and a client concerning the accuracy, completeness or currency of information and the client asks Catholic Church Insurances to associate with the information a statement claiming that information is not accurate, complete or current, Catholic Church Insurances will take reasonable steps to do so.

7.0 IDENTIFIERS

Catholic Church Insurances will use our own identifiers and not those assigned by the Government unless we are required to do so.

We will not disclose an identifier assigned by a Government agency, unless the disclosure is:

- a) to prevent or lessen a threat to a clients life or health
- b) to advise relevant authorities where unlawful activity is suspected
- c) required or specifically authorised by law
- d) reasonably necessary for the enforcement of criminal law or imposing a pecuniary penalty or for the protection of public revenue
- e) necessary to safeguard national security

8.0 ANONYMITY

Catholic Church Insurances will wherever it is lawful and practicable give people the option to operate anonymously.

In some circumstances there will be legal obligations that require identification of the individual

9.0 TRANSBORDER DATA FLOW

Catholic Church Insurances will only transfer information outside Australia if:

- (a) we reasonably believe that the recipient of the information is subject to a statute, binding scheme or contract which effectively upholds principles for fair information handling that are substantially similar to these principles; or
- (b) the client concerned consents to the transfer;
- (c) the transfer is necessary for the performance of a contract between the client concerned and Catholic Church Insurances, or for the implementation of pre-contractual measures taken in response to the client's request; or
- (d) the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the client concerned between the organisation and a third party; or
- (e) the transfer is for the benefit of the client concerned, and
 - (i) it is not practicable to obtain the consent of the subject of the information to that transfer; and
 - (ii) if it were practicable to obtain such consent, the subject of the information would be likely to give it
- (f) Catholic Church Insurances has taken reasonable steps to ensure that the information which it has transferred will not be collected, held, used or disclosed by the recipient of the information inconsistent with these principles.

10.0 SENSITIVE INFORMATION

Catholic Church Insurances will not collect personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, or details of health or sex life unless:

- (a) the subject of the information has consented; or
- (b) the collection is required or specifically authorised by law; or
- (c) the collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any client, where the subject of the information is physically or legally incapable of giving consent; or
- (d) the collection is necessary for the establishment, exercise or defence of a legal claim.

COMPLAINT RESOLUTION

Catholic Church Insurances will deal with complaints concerning privacy issues in accordance with our Privacy Complaints Handling Procedure.

In the event of a claim for an alleged breach of privacy under this policy, we will;

- provide assistance to the complainant including a brochure explaining the internal and external process
- respond within our service standards
- make no charge
- give reasons for our decision on the complaint.

TRAINING

Catholic Church Insurances will ensure that all staff receive appropriate training in the application and observance of the stated principles and complaints handling procedure.

All Catholic Church Insurances staff members will be required to have successfully complete the Privacy examination.

All new members of staff will be introduced to our Privacy Policy and Complaints Handling Procedure during their induction.

PRIVACY COMMITTEE

The Privacy Committee will promote and develop awareness of the “National Privacy Principles”.

Members of the Privacy Committee will form the “Privacy Disputes Resolution Committee”.

DEFINITIONS

Primary Purpose

Dominant or fundamental reason for information being collected.

Secondary Purpose

Where the information used is related to the “primary purpose” and a person would reasonably expect the information to be used or disclosed in that way.

Sensitive Information

Includes information about an individual’s racial or ethnic origin, political association, religious beliefs, sexual preferences or criminal record and would not usually be collected in the ordinary operation of Catholic Church Insurances.

Personal Information

Information whether true or not and whether recorded in a material form or not. It includes all personal information regardless of its source. Personal information relates to a natural living person.

Identifier

An identifier (usually a number) assigned by an organisation to an individual to uniquely identify that individual for the purposes of the operations of the organisation. An individual’s name or ABN is not an identifier.