

PRIVACY POLICY



PROTECTING YOUR PRIVACY

The privacy of your personal information is very important to Virgin Money Australia Pty Limited ABN 75 103 478 897 (“**Virgin Money Australia**”) and Auto & General Services Pty Ltd ABN 61 003 617 909 (“**AGS**”, “**we**” / “**us**” / “**our**”).

This Privacy Policy contains important information about the type of personal information we collect, the purposes for which it is used, how it is managed, to whom we disclose it and what measures we take to comply with privacy laws in respect of our websites and our call centre (**call centre**).

This Privacy Policy is governed by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Privacy Principles contained therein. We are bound by the Privacy Act and are committed to complying with the Privacy Principles. The privacy of your personal information is very important to us.

We may make changes to this Privacy Policy from time to time for any reason. We will publish changes to this Privacy Policy on our websites.

As a customer of Virgin Money Australia you will also be subject to the terms of Virgin Money Australia’s privacy policy which, amongst other things, explains the additional information Virgin Money Australia’s may collect about you and how it may be used. Virgin Money Australia’s privacy policy can be found at virginmoney.com.au

It is important that you read and understand this Privacy Policy.

WHAT PERSONAL INFORMATION WE COLLECT

We collect personal information from you that is relevant to providing insurance products and services to you.

Personal information

The personal information we collect and store about you may include:

- your name;
- contact details (including mobile phone, telephone and email);
- age;
- gender; or
- previous or current insurance;

and such other information which is relevant and necessary to providing products and services to you or to comply with the law.

WHY WE COLLECT PERSONAL INFORMATION

We will inform you of the main reasons for collecting your personal information at the time we request it. The purposes for which we will generally collect and use your information include considering any application you make to us, providing products and services to you, performing administrative functions, enhancing our products and services and telling you about our other products and services which may include those of our business partners, which we believe may interest you. You may tell us at any time that you do not want us to advise you about other products and services (see Marketing below for more details).

HOW WE COLLECT PERSONAL INFORMATION

We collect information from you in various ways. It might be through our call centres, over the internet if you transact with us online, or when you fill out an application form for one of our products online or via social media.

Information collected online

We collect information about visitors using our online resources. Any information collected is used to provide our products and services and to identify online behavioural patterns.

Our online resources include, but are not limited to websites and mobile applications “apps”. Information collected by these resources may collect the following information:

- Server address/IP address
- Date and time of visit to our site
- Pages visited
- Documents downloaded
- The site you visited prior to visiting our website
- The browser you are using to access our resources
- If you have visited our website before
- Tracking user preferences

In addition to the above, mobile apps may collect location data; however, you will be notified if this is the case.

From time to time, we may use data collection devices such as ‘cookies’ in conjunction with our website. Cookies are commonly used on the internet. They are a small file placed onto a computer by a server. A cookie can later be identified by a server. We may use both ‘persistent’ and ‘session cookies’. We may (or our marketing company may) evaluate the cookie information collected to measure the effectiveness of our advertising and how visitors use our site. Where our marketing company manages the information coming from our site on our behalf, we control how that data may and may not be used. Any information that is collected in this way is used in an aggregated form, we do not use it to identify you as an individual.

We may use cookies for various purposes such as,

- to provide you with better and more customised service and a more effective website
- collecting anonymous statistical information on things such as how many visitors our sites receive, how those visitors use the sites and where they came from.

Most of our online resources use sessions and/or cookies. If you wish, you can configure your browser so it does not accept cookies, but this may affect the functionality of the website.

Collecting personal information from third parties

Where possible, we collect personal information directly from you. However, in some circumstances we may also collect personal information from other sources so that we can provide you with a policy or assess a claim you make.

For example:

- you may apply for a product through a broker, intermediary, business partner or other distributor; or
- information required to investigate, assess and pay claims may be collected from third parties such as other insurers, insurance reference services or medical providers or other professional experts (to verify or clarify, if necessary, any health information you may provide)

If we receive information about you from a third party and it is not information we need in respect of the services we provide, we will destroy or de-identify that information (provided it is lawful to do so).

We may also collect personal information about someone else from you. For example, you may wish to purchase insurance in joint names and so you provide us with personal information about your spouse. Where you provide us with personal information about other people you must have their consent to do this, and to provide it on their behalf. If not, you must tell us.

DEALING WITH US ANONYMOUSLY OR USING A PSEUDONYM

Where possible, you have the option of interacting with us anonymously or pseudonymously. Whilst you are entitled to interact with us anonymously or by using a pseudonym, we will need to know who you are in order to provide you with our products and services.

USE OF INFORMATION

We use your personal information in accordance with the Privacy Principles. We use the personal information collected for a number of purposes, including:

- Assessing your policy application, establishing and administering your policy;
- Processing premiums and payments;
- Improve the way we provide our products and services;
- Produce policy schedules and other mail related services;
- Assess, process and investigate any insurance risks, claims or complaints;
- Assessing risks and underwriting insurance;
- Training our employees, agents and representatives;

Marketing

From time to time, we may use the information we collect from you to let you know via mail, SMS, email, telephone or online about any news, special offers, products and services. We will never sell or disclose your personal information to other companies, however, we may provide your personal information to our business partners so that they can provide you with information about their products and services that you might be interested (where you have agreed). Should you purchase products or services on our business partner websites, their privacy policy will apply to those products and services.

Direct Marketing Opt Out

If you do not want to receive any marketing offers, you can choose to opt out of our marketing activities. To opt out, you can either:

- use the unsubscribe function from our emails, SMS, MMS or IM; or
- contact us using the Contact Details below.

You can, however, change your mind about opting out of receiving information about our products and services at any time by contacting us using our Contact Details noted below.

DISCLOSURE TO OTHER PARTIES

The personal information that is collected from you will be disclosed to the insurer. It may also be disclosed to other parties which are involved with the provision of our products and services to you such as our related bodies corporate, claims assessors, investigators, lawyers (should they be required in the event of a claim), other insurers (for the purpose of seeking claims recoveries or to assist them to assess insurance risks) and insurance reference services.

If Virgin Money Australia ceases its relationship with AGS, Virgin Money Australia may also disclose the personal information that it or AGS has collected from you, to third parties including other insurance brokers and/or insurance companies, so as to offer or supply you with insurance, unless you tell Virgin Money Australia otherwise.

The information we provide to third parties will be strictly limited to what is required to provide the products and services, where disclosure is required, or authorised by or under law (for example, we may disclose information to government agencies) or where you have requested us to or have consented to the disclosure to a third party. The third parties may include overseas organisations (see below).

Some of the parties with which we exchange your personal information, including our partners, service providers and other third parties listed above, may be located outside Australia in countries including New Zealand, Philippines, India, Singapore, Japan, the United States of America, United Kingdom, Spain and Israel. Where we do this, we make sure that such organisations have the appropriate data handling and security arrangements in place.

ACCESS TO AND ACCURACY OF PERSONAL INFORMATION

You can request access to the personal information we hold about you at any time by contacting us using the Contact Details noted below and we will provide you with that information unless we are prevented by law from giving you that access. If we are unable to provide you with the requested information, we will provide you with a written explanation.

Where access is granted to your information, we may charge a reasonable fee for such access and if we do, we will advise you of the fee prior to proceeding with the request.

We take reasonable measures to ensure that the personal information we hold about you is accurate and up to date. Under the Privacy Act, you also have a right to request that we correct information, if you believe your personal information is not accurate and up to date, we would encourage you to inform us by contacting us using the Contact Details noted below. We will promptly update any information that is incorrect and confirm to you when we have done so.

HOW WE STORE PERSONAL INFORMATION

We will store your personal information in a number of ways including:

- in electronic systems and devices;
- in telephone recordings;
- in paper files;
- secure document retention services off-site; and/or
- cloud facilities operated by us (or by third parties on our behalf)

INFORMATION SECURITY

We will take reasonable precautions to ensure that the personal information that we have about you is protected against any unlawful use, unauthorised access, modification or disclosure and these precautions include:

- using appropriate information technology and processes;
- using computer and network security systems with appropriate firewalls, encryption technology and passwords for the protection of electronic files;
- securely destroying or “de-identifying” personal information if we no longer require it subject to our legal obligations to keep some information for certain prescribed periods; and
- restricting access to your personal information to our employees and those who perform services for us who need your personal information to do what we have engaged them to do;
- requesting certain personal information from you when you wish to discuss any issues relating to the products and services we provide to you.

While we undertake reasonable steps to protect your personal information, no guarantee can be given that information sent over the internet is always 100% secure. Sending and receiving information over the internet is at the user’s own risk, however we will take all reasonable steps to ensure your data security once we receive it.

WEBSITE LINKS

Virgin Money Australia has linked its website to AGS’ website for the purposes of offering you certain insurance products. Virgin Money Australia nor AGS has control over the content on other websites that are accessible from a link on their websites, and they take no responsibility for the conduct of those third party companies. Always read the privacy and security statements when using other websites.

PRIVACY CONCERNS

We are committed to resolving any concerns or complaints you may have, please contact us at any time by contacting us using the Contact Details noted below.

Our representative will be in contact with you regarding your concern or complaint and will let you know who will be assisting you, their contact details and the expected resolution date of your issue within 48 hours.

If the issues raised are more complicated one, we may ask you for additional documentation to help resolve the issue. In turn, we will keep you updated on the progress of your complaint.

We will try to answer any questions you may have, correct any error on our part or resolve any complaint or concern that you may have about our information handling practices. If we do not resolve a complaint to your satisfaction, you also have the right to complain to the Office of the Australian Information Commissioner (OAIC) using the Contact Details noted below:

CONTACT DETAILS

AGS Privacy Officer	Virgin Money Australia Privacy Officer	Australian Information Commissioner
privacyquery@autogeneral.com.au Privacy Officer Auto & General Services Pty Ltd PO Box 342 TOOWONG QLD 4066	privacy@virginmoney.com.au Privacy Officer Virgin Money Australia, Level 4, 7 Macquarie Place, Sydney NSW 2000	Email: enquiries@oaic.gov.au GPO Box 5218 Sydney NSW 2001 Phone: 1300 363 992 Website: www.oaic.gov.au

VIRGIN MONEY PRIVACY NOTICE

This privacy notice relates to how Virgin Money and each of its related bodies corporate, including Virgin Money Financial Services Pty Ltd (ABN 51 113 285 395) & Virgin Money Home Loans Pty Ltd (ABN 81 117 183 623) (referred to as "Virgin Money") collect, use and disclose your personal information.

Virgin Money collects your personal information so that they can manage your product, send you statements and other information, let you know about features of any rewards program that may be part of your product, respond to your questions, solve your problems, verify your identity, perform administrative functions, conduct customer satisfaction research, improve their products and develop new products and so that they and their related companies and corporate partners can tell you about other products and services you may be interested in.

Virgin Money may also collect your personal information to comply with legislative and regulatory requirements, for example under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), Superannuation Industry (Supervision) Act 1993 (Cth), Superannuation Guarantee (Administration) Act 1992 (Cth), Insurance Contracts Act 1986 (Cth), Corporations Act 2001 (Cth) and National Consumer Credit Protection Act 2009 (Cth).

If you don't provide Virgin Money with your personal information or otherwise authorise them to collect this information from third parties, they may not be able to provide you with one or more of their products or services.

COLLECTION

Virgin Money will ordinarily collect any information about you directly from you or where it is provided to them with your authority. If personal information about you is collected by third parties on any website you have accessed through Virgin Money's websites, they may also collect or have access to that information as part of our arrangement with those third parties. If at any time you supply Virgin Money with personal information about another person, you should ensure that you are authorised to do so and you agree to inform that person of the content of this Notification and Consent

From time to time Virgin Money may receive information that Virgin Money have not asked for about you from third parties. Virgin Money will only keep, use and disclose this information as permitted by law.

DISCLOSURE

Virgin Money may sometimes disclose your personal information with to other organisations to deliver Virgin Money products or services to you which may include marketing Virgin Money products.

The types of organisations to which Virgin Money may disclose this information include other financial services companies that Virgin Money partner's with to provide their products and services, regulatory bodies and government agencies, courts and external dispute resolution schemes, your agents, including brokers or financial advisers, their agents, contractors and professional advisers who assist them in providing our services, your referees and guarantors, your or Virgin Money insurers, and organisations that carry out functions on Virgin Money's behalf including mailing houses, data processors, researchers, system developers or testers, accountants, auditors and lawyers.

Virgin Money may also disclose your personal information to third parties where you request Virgin Money to or consent to them doing so or in order to provide Virgin Money product and services to you and to fulfil Virgin Money's legal obligations.

Virgin Money, their related bodies corporate, affiliate companies and their partners and agents may use your personal information (including your telephone number, regardless of whether it is listed on the Do Not Call Register, and your email or other electronic addresses) to keep you informed about other products, services and offers which may be of interest to you. They may do this by phone, mail, email and SMS or other electronic messages (without an unsubscribe facility). These consents operate indefinitely and shall remain in effect unless and until you notify us that you do not want to receive such direct marketing communications. If you do not wish to receive these communications please notify us in writing or by phone on **1800 724 678**. Note: If you have not told Virgin Money that you do not wish to receive these communications by phone, you may be contacted even if you have registered your phone number on the national Do Not Call Register.

VIRGIN MONEY PRIVACY POLICY

The Virgin Money Privacy Policy sets out how you can access and correct information they hold about you, how you can complain about a breach by them of your privacy rights and how your complaint will be handled. The Virgin Money Privacy Policy can be found at **www.virginmoney.com.au**

If you have a complaint about a breach of your privacy, please contact Privacy Officer, Virgin Money, Level 4, 7 Macquarie Place, Sydney NSW 2000 Email: **privacy@virginmoney.com.au**.

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