



## Data Protection Policy

Stock & Stations Agents Co-Operative Limited t/as Stockinsure  
ABN 41 591 406 189

# Contents

Who Does This Data Protection Policy Apply to? .....	2
What Does This Data Protection Policy Cover?.....	2
What Information Does Stockinsure Collect And How Is It Used? .....	2
Why Does Stockinsure Collect Your Personal Information? .....	3
How Stockinsure Collects Your Personal Information?.....	3
Website Information And Content .....	3
What If You Do Not Provide Some Information To Stockinsure? .....	4
Disclosure Of Your Personal Information .....	4
Disclosure Of Your Personal Overseas .....	4
Your Obligations When You Provide Personal Information Of Others .....	5
Additional Circumstances Where Personal Information May Be Disclosed .....	5
Protection Of Personal Information.....	5
Disclosure Of Personal Information.....	6
Notifiable Data Breaches Scheme .....	6
Accuracy, Access and Correction Of Your Personal Information .....	7
Checking, Updating And Correction Of Your Personal Information .....	7
Accuracy, Access And Correction Of Your Personal Information .....	7
Your Consent .....	7
Responsibility and Review .....	7



## WHO DOES THIS DATA PROTECTION POLICY APPLY TO?

This data protection policy applies to Stock & Stations Agents Co-Operative Limited t/as Stockinsure (Stockinsure) (ABN 41 591 406 189) a Corporate Authorised Representative of Coverforce Insurance Broking Pty Ltd (AR 000341236).

'you' and 'your' refer to you as the person whose personal information may be collected, used and maintained by Stockinsure.

## WHAT DOES THIS DATA PROTECTION POLICY COVER?

Stockinsure is committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth) (the **Act**) and the Australian Privacy Principles (the **Principles**).

This Data Protection Policy governs how Stockinsure manages the collection, handling, use and disclosure of personal and sensitive information. It also provides information on how you can report a breach of the Australian privacy laws, how you can access any personal information that Stockinsure holds and how to have that information corrected (if required).

## WHAT INFORMATION DOES STOCKINSURE COLLECT AND HOW IS IT USED?

Stockinsure collects personal information directly from a relevant individual or indirectly from a third party.

Personal information is "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 recorded in a material form or not."

Sensitive information is a "more sensitive subset of personal information, which includes your health information, criminal history, racial or ethnic origin, sexual orientation etc."

The collection of personal information may include obtaining information from a previous insurer, broker, publicly available resources,

health care providers or other persons that have a business relationship with you.

When Stockinsure arranges insurance on your behalf, Stockinsure will ask you for the information needed to advise you about your insurance needs and management of your risks. This can include a broad range of information including your name, address, contact details, age, and personal affairs such as assets, personal belongings, financial situation, health and wellbeing.

Stockinsure may provide this information to insurers or intermediaries who will be asked to quote for your insurances and premium funding to enable them to decide whether to insure you and on what terms, or to fund your premium and on what terms.

Insurers may in turn pass this personal information on to their reinsurers. Some of these companies are located outside of Australia. For example, if Stockinsure seek insurance terms from an overseas insurer (e.g. Lloyd's of London), your personal information may be disclosed to the insurer. If this is likely to happen, Stockinsure will inform you of where the insurer is located if it is possible to do so.

When you make a claim under your policy, Stockinsure will assist you by collecting personal information about your claim. At certain times, Stockinsure may need to collect personal information about you from others. Stockinsure will then provide this information to your insurer (or anyone that your insurer has appointed to assist in the consideration of your claim e.g. loss adjusters, medical brokers, lawyer etc.) to enable the insurer to consider your claim. Stockinsure reiterates that this personal information may then be passed on to reinsurers.

At certain points in time, Stockinsure may use your contact details to send you direct marketing communications including offers, updates and newsletters that are relevant to the services that Stockinsure provides. Stockinsure will always provide you with the option of electing not to receive these communications in the future. You are able to unsubscribe by notifying Stockinsure so that this information is no longer sent to you.

You may be able to deal with Stockinsure at certain times without identifying yourself (i.e. anonymously or by using a pseudonym) such as when making a general enquiry relating to the services that Stockinsure offers. If you wish to do so, please contact Stockinsure to determine whether or not this is practicable in your circumstances. If you do not provide relevant information that Stockinsure needs, Stockinsure or any of their third party providers may not be able to provide you with the appropriate services.

### **WHY DOES STOCKINSURE COLLECT YOUR PERSONAL INFORMATION?**

Stockinsure collects your personal information (including sensitive information) so that Stockinsure can:

1. underwrite and administer your insurance cover;
2. advise you about and determine what other service or products Stockinsure can:
  - a. provide to you; or
  - b. that may be of interest to you.
3. identify you and conduct the necessary checks;
4. issue, manage and administer services and products provided to you or others, including processing requests for quotes, applications for insurance, underwriting and pricing policies, issuing you with a policy, managing claims, claims investigation, handling and settlement;
5. maintain and improve Stockinsure's services and products;
6. make special offers or offer other services and products provided by Stockinsure or those that Stockinsure has an association with that may be of interest to you.

### **HOW STOCKINSURE COLLECTS YOUR PERSONAL INFORMATION?**

Stockinsure may collect personal information in a number of ways, including but not limited to:

1. directly, from Stockinsure website, telephone, in writing or email; and/or
2. indirectly from third parties, if required. For example, your employer or Coverforce Group broker may provide information about you for the purpose of obtaining Stockinsure broking services. Stockinsure may also obtain personal information from referees or references, underwriters, premium funders and other service providers or publicly from available sources.

### **WEBSITE INFORMATION AND CONTENT**

*anonymous data* – Stockinsure use technology to collect anonymous information about the use of Stockinsure website. For example, when you browse the website the service provider logs your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and Stockinsure only use this information for statistical purposes and to improve the content and functionality of our website, to better understand clients and markets and to improve Stockinsure services.

*Cookies* – In order to collect this anonymous data Stockinsure may use "cookies". Cookies are small pieces of information which are sent to your browser and stored on your computer's hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. Cookies may be stored for up to 5 years after you leave the website.

Stockinsure collects and uses these cookies to detect repeat visitors or store small amounts of data collected while users are on the site (website preferences, session variables, etc.) to better serve customers next time they visit, or to improve the experiences of customers.

*Forms* – The website allows visitors to submit information via self-service forms (claim forms, employment and contact request). The information submitted via the forms is not encrypted – an option is available for claim forms to be downloaded in PDF format for faxing.

Should you be concerned about confidentiality of the claim information, this would be the recommended method.

Information collected via on-line forms is sent to Stockinsure offices via email (not encrypted) and is also stored on a database which is accessible by staff only (password protected).

Stockinsure also use your information to send you requested product information and promotional material and to enable Stockinsure to manage your ongoing requirements e.g. renewals, relationship with you, e.g. invoicing, client surveys etc.

Stockinsure may occasionally notify you through direct marketing about new services and special offers, events or articles we think will be of interest to you. Stockinsure may send you regular updates by email or by post on insurance matters. If you would rather not receive this information or do not wish to receive it electronically, email or write to Stockinsure via the contact details below.

Stockinsure may use your information internally to help Stockinsure improve our services and help resolve any problems.

### **WHAT IF YOU DO NOT PROVIDE SOME INFORMATION TO STOCKINSURE?**

Stockinsure can only fully advise you and assist in arranging your insurance or with a claim if Stockinsure is provided with all of the relevant information.

Under the Insurance Contracts Act 1984 you have an obligation to disclose certain information. Failure to disclose such information may result in Stockinsure declining cover, a cancellation of your insurance cover or reducing the level of cover or declining claims.

If you choose not to provide Stockinsure with the information that has been requested, Stockinsure may not be able to provide you with Stockinsure's services of products or properly manage and administer services and products provided to you or others.

### **DISCLOSURE OF YOUR PERSONAL INFORMATION**

Where appropriate Stockinsure will disclose your personal information to:

1. Stockinsure related entities, brokers or third parties as is required in order to provide Stockinsure services, including Stockinsure external service providers, such as payment system operators, accountants and other advisers and financial institutions;
2. if you are a broker, to insurers, reinsurers, or other insurance intermediaries, insurance reference bureaus and industry bodies and groups; and
3. any other entities notified to you at the time of collection.

Other than when required or permitted by law, as specified in this data protection policy or where you have provided your consent, Stockinsure will not disclose your personal information. Nothing in this policy will prevent Stockinsure from using and disclosing to others de-personalised aggregated data.

### **DISCLOSURE OF YOUR PERSONAL OVERSEAS**

If you ask Stockinsure to seek insurance terms and Stockinsure subsequently recommends an overseas insurer, Stockinsure may be required to disclose the information to the insurer located outside of Australia. For example, if Stockinsure

recommends a policy that is provided by Lloyd's of London, your personal information may be provided to the Lloyd's broker and underwriters at Lloyd's of London to make a decision about whether to insure you.

Stockinsure will inform you at the time of advising on your insurance if we are required to disclose your personal information overseas and the country that Stockinsure will be disclosing the information to. If the overseas insurer is not regulated by Australian law or by laws which protects your personal information in a way that is similar to the Act, Stockinsure will seek your consent prior to disclosing that information to that overseas insurer.

Australian and overseas insurers acquire reinsurance from reinsurance companies that are located internationally. In some cases, your personal information may be disclosed to them for assessment of risks and in order to provide reinsurance to your insurer. Stockinsure does not make this disclosure as this will be made by the insurer (if necessary) for the placement of their reinsurance program.

### **YOUR OBLIGATIONS WHEN YOU PROVIDE PERSONAL INFORMATION OF OTHERS**

You must not provide Stockinsure with personal information (including sensitive information) of any other individual (including any of your employees or clients if you are a broker) unless you have the express consent of the individual to do so. If you do provide Stockinsure with personal information of an individual, before doing so you are required to do the following:

1. tell the individual that you will be providing their information to Stockinsure and that Stockinsure will handle their information in accordance with this data protection policy;
2. provide that individual with a copy of (or refer them to) this data protection policy; and

3. warrant that you have the individuals consent to provide their information to Stockinsure.

### **ADDITIONAL CIRCUMSTANCES WHERE PERSONAL INFORMATION MAY BE DISCLOSED**

Stockinsure may also be required by law to disclose your personal information. Such circumstances where this will occur will include compliance with a court order, warrant, subpoena or additional legal requirements from time to time.

### **PROTECTION OF PERSONAL INFORMATION**

Stockinsure strives to maintain the reliability, accuracy, completeness and currency of the personal information that Stockinsure holds. At all times Stockinsure strives to protect the privacy and the security of the personal information that it holds. Stockinsure maintains and stores personal information only for so long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

Stockinsure holds the personal information that is collected initially in a working file which is electronically stored. Any paper, other than the original documents that Stockinsure is legally obliged to maintain in an original format, will be destroyed in Stockinsure on-site shredder. In a number of cases, your file will be archived and sent to an external data storage provider for a period of time. Stockinsure only use storage providers who are located in Australia and who are regulated by the Act.

Stockinsure ensures that the information is safe by protecting it from unauthorised access, modification and disclosure. Stockinsure maintains physical security over all paper and electronic data that is stored on the premises, by using locks and security systems. Stockinsure also maintains computer and network security. An example of this is that we use firewalls (security measures for the internet) and other security systems such as user

identifiers and passwords to control access to computer systems where your information is stored.

## **DISCLOSURE OF PERSONAL INFORMATION**

In the course of underwriting and administering your policy as well as providing services to you, Stockinsure may disclose your information to entities which Stockinsure is related to.

Stockinsure does not sell, trade or rent your personal information with others.

Stockinsure may need to provide your personal information to contractors who supply services to Stockinsure. For example, to handle mailings on behalf of Stockinsure, external data storage providers or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. Stockinsure will take all reasonable measures to ensure that your personal information is protected as per the requirements of the Act.

Stockinsure may provide your personal information to others if required by law and other circumstances which the Act permits Stockinsure to do.

## **NOTIFIABLE DATA BREACHES SCHEME**

The notifiable data breaches scheme under Part IIIC of the *Privacy Act 1988 (Privacy Act)* established requirements for entities to respond to data breaches. Stockinsure has data breach notification obligations when a data breach is likely to result in serious harm to any individual whose personal information is involved in the breach.

The data breaches that require notification if they are likely to result in serious harm to the individual that is affected. These are referred to as 'eligible data breaches'. There are some exceptions which may mean that notifications are not required for certain eligible data breaches.

An eligible data breach will occur when:

1. there is unauthorised access to or unauthorised disclosure of personal

information, or a loss of personal information, that an entity holds;

2. this is likely to result in serious harm to one or more individuals; and
3. the entity has not been able to prevent the likely risk of serious harm with remedial action.

Unauthorised access of personal information occurs when personal information that an entity holds is accessed by someone who is not permitted to have access. This includes unauthorised access by an employee of the entity or an independent contractor, as well as unauthorised access by an external third party (such as by hacking).

Unauthorised disclosure occurs when an entity, whether intentionally or unintentionally, makes personal information accessible or visible to others outside the entity, and releases that information from its effective control in a way that is not permitted by the Privacy Act.

Loss refers to accidental or inadvertent loss of personal information held by an entity in circumstances where it is likely to result in unauthorised access or disclosure.

To assess whether serious harm is likely it must be determined that from the perspective of a reasonable person the data breach would likely result in serious harm to an individual whose personal information was part of the data breach. Serious harm is not defined in the act however it could refer to serious physical, psychological, emotional, financial or reputational harm.

Agencies and organisations that suspect an eligible data breach may have occurred must take a reasonable and expeditious assessment to determine if the data breach is likely to result in serious harm to any individual that is affected.

When an agency or organisation is aware of reasonable grounds to believe an eligible data breach has occurred, they are obligated to promptly notify individuals at likely risk of serious harm. The commissioner must also be notified through a statement about the eligible data breach.



The notification to affected individuals and the commissioner must include the following information:

1. the identity and contact details of the organisation;
2. a description of the data breach;
3. the kinds of information concerned; and
4. recommendations about the steps individuals should take in response to the data breach.

The notifiable data breach form can be found at the following link on the Australian Government website (as amended from time to time):

<https://forms.uat.business.gov.au/smartforms/landing.htm?formCode=OAIC-NDB>

### **ACCURACY, ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION**

Stockinsure takes reasonable steps to ensure that your personal information is accurate, complete and up-to date whenever Stockinsure collects, uses or discloses it. Stockinsure will rely on you to advise of any changes to your personal information. All personal information identified as being incorrect is updated in our database and, where applicable and appropriate, on Stockinsure website.

### **CHECKING, UPDATING AND CORRECTION OF YOUR PERSONAL INFORMATION**

Upon receipt of your written request and information, Stockinsure will disclose to you the personal information that Stockinsure holds about you. Stockinsure will also correct, amend or delete any personal information that Stockinsure believes is inaccurate, irrelevant, out of date or incomplete. If you wish to access or correct your personal information, please write directly to Stockinsure Privacy Officer:

#### **Privacy Officer**

c/- Stock & Stations Agents Co-Operative Limited t/as Stockinsure

Level 13, 234 George Street,  
Sydney NSW 2001

Stockinsure does not charge for receiving a request for access to personal information or complying with a correction request. Where the information that has been requested is not a straightforward issue and will involve a considerable amount of time then a charge will need to be confirmed for responding to the request for information.

In limited cases, Stockinsure may be required to refuse access to your personal information or refuse a request for a correction. Stockinsure will advise you as soon as possible after your request if this is the case and the reasons for the refusal.

### **ACCURACY, ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION**

If you have concerns about whether Stockinsure has complied with the Act or this policy when collecting or handling your personal information, please write to Stockinsure Privacy Officer:

#### **Privacy Officer**

c/- Stock & Stations Agents Co-Operative Limited t/as Stockinsure

Level 13, 234 George Street,  
Sydney NSW 2001

**T** (02) 9998 8266

**E** [admin@stockinsure.com.au](mailto:admin@stockinsure.com.au)

**W** [stockinsure.com.au](http://stockinsure.com.au)

Your complaint will be considered by Stockinsure through the internal complaints resolution process and Stockinsure will try to respond with a decision within 30 days of the complaint being made.

### **YOUR CONSENT**

By asking Stockinsure to assist with your insurance needs, you consent to the collection and use of the information that you have provided to Stockinsure for the purposes that are described above.

### **RESPONSIBILITY AND REVIEW**

Stockinsure Legal Counsel in conjunction with the Compliance Committee is responsible for review and updating of the Data Protection Policy. This policy will also be subject to a formal review every two years or earlier as required.