

Privacy Statement and Policy

For

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1. Privacy and Statement Policy

SureFact Australia Pty Ltd (SureFact) is a privately owned investigations company providing tailored solutions to insurance companies, large corporate organisations, small to medium businesses, law firms and government agencies. At SureFact, we recognise the importance of your privacy and understand your concerns about the security of the personal information you provide to us. We comply with the Australian Privacy Principles (“APPs”) as contained in the Privacy Act 1988 (Cth). The APPs detail how personal information may be collected, used, disclosed, stored and destroyed, and how an individual may gain access to, or make complaints about, the personal information held about them.

In the course of doing business, we predominantly collect business information. However, the ancillary collection of personal information in some instances is necessary or unavoidable. This privacy policy explains personal information we collect and what use we make of that information. The policy also explains when and why your information may be disclosed to third parties.

Our privacy policy is divided into the following sections:

- Why, How and What Personal Information is Collected;
- Using and Disclosing Your Personal Information;
- Accuracy and Access;
- Security and Destruction;
- Use of Cookies, MailChimp and Links to other Websites;
- Future Changes.
- What if you have a Complaint?
- How to Contact us

1.1 Why, How and What Personal Information is Collected

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities, and to provide our Industry advice and other service offerings.

We collect the information necessary for us to provide you with the products and services you have requested from us, and to manage investigations.

We will only collect your sensitive information if you have provided us with consent to do so.

The information we collect and hold generally includes your name, address, date of birth, and contact details (such as your phone number, fax number and/or email address).

However, we may also collect and hold other information required to provide services or assistance to you, including your gender, employment, sensitive information (such as medical conditions and criminal records) and claims history.

SureFact collects the information you give us either online or by email, post, facsimile, face to face, or over the phone. However, there may be occasions when we collect your information from someone else. This may include authorised representatives, insurers, employers, our distributors, agents or related entities, medical practitioners, and rehabilitation providers, another party involved in a claim, investigators, family members, anyone you have authorised to deal with us on your behalf, and/or our/your legal advisers. On all occasions, your information is collected, held, used, and disclosed by us in accordance with this Privacy Policy.

If you ask SureFact to supply you with our products and services, SureFact will ask you to provide certain details. This information may include your full name, mailing address, phone number, email address and where applicable, your facsimile number. In cases of businesses acquiring our products or services, SureFact usually requires the name, title, and contact details of a contact person in the business. SureFact may also request information about you in order to help you decide which of our products or services would best suit your requirements. However, we only collect information that we need.

Where we or other businesses in the SureFact Group use your personal information for newsletter, marketing and educational briefing communications, you can opt out at any time by notifying us.

1.2 Using and Disclosing Your Personal Information

In the normal course of our business, personal information is disclosed to insurers and medical representatives and may also be disclosed to our associated group of companies which also hold personal information on secured databases and do not use or disclose that personal information. Information submitted to us is only available to employees managing this information for purposes of contacting you, sending you emails or managing your claim and or investigation.

We only use your information for the purpose for which it was provided to us, related purposes and as permitted by law. Such purposes include:

- Responding to your enquiries
- Providing you with the assistance you requested of us, our products, and services (for example, processing requests for quotes, managing claims, processing payments, etc.)
- Maintaining/Administering your account and processing payments you have authorised
- Providing you with marketing information regarding other products and services (of ours or of a third party) which we believe may be of interest to you if you opt- in to receive such information
- Quality assurance and training purposes
- Any other purposes identified at the time of collecting your information.

However, we will only use your sensitive information for the purposes for which it was initially collected, other directly related purposes or purposes to which you otherwise consent.

Where you are a prospective employee of any entity within the SureFact Group, we will collect, hold, use and disclose your personal information for purposes related to your prospective recruitment. In many cases, our recruitment activities are managed by a third-party recruitment agency.

1.3 Accuracy and Access

SureFact will take reasonable steps to ensure that the personal information we collect is accurate, complete and up to date, and when inappropriate we will allow an individual access to correct their personal information on request in accordance with the Australian Privacy Principles.

If you believe that SureFact may hold personal information about you which is inaccurate, or you wish to change or update any of the personal information you have provided, please contact us on 02 8745 2000 and we will take reasonable steps to ensure that it is corrected.

1.4 Security and Destruction

SureFact takes reasonable steps to ensure the security of personal information held by it from such risks as loss or unauthorised access, destruction, use, modification, or disclosure. Our IT systems are password protected and we use firewalls and data encryption to protect information.

We also maintain physical security over our paper files, data stores and premises, including locks and security systems. Access to personal information is restricted to authorised SureFact personnel who need to access those records as part of their job.

SureFact will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose. We will retain your personal information for the time periods required by law (commonly, 7 years).

We use secure methods to destroy your personal information when it is no longer needed:

- Paper records are sent for secure destruction. In some instances, paper records will be returned to you and/or relevant third parties.
- Electronic records retained for longer than 7 years may be archived to alternative secured storage.

However, no data protection and security measures are completely secure. Despite all the measures we have put in place, we cannot guarantee the security of your information, particularly in relation to transmissions over the internet.

Accordingly, any information which you transmit to us is transmitted at your own risk. You must take care to ensure you protect your information (for example, by protecting your usernames and passwords, etc.) and you should notify us as soon as possible after you become aware of any security breaches.

1.5 Use of Cookies, MailChimp and Links to other Websites

SureFact's website uses cookies as you visit to facilitate some functions. A cookie's main objective is to identify users and personalise their visit by customising web pages for them. They are used to recognise your computer, so that you do not have to re-

enter the same information each time you access our sites. A web server gives a message to a web browser. The message is then stored by the browser in a text file.

We use MailChimp a web based software program to create, send and track our email newsletters.

We may provide links to websites outside of our service. These linked sites are not under our control and we are not responsible for the conduct of third parties. Before disclosing your personal information on any website, we advise you examine the Terms and Conditions of those websites.

We provide links to other sites as a convenience to you and the existence of a link to other sites does not imply any endorsement on our part and we are not responsible for the material contained on those linked sites.

1.6 Future Changes

From time to time, our policies will be reviewed and may be revised. We reserve the right to change our Privacy Policy at any time and notify you by posting an updated version of the policy on our company website. The amended Privacy Policy will apply between us whether or not we have given you specific notice of any change.

1.7 What if you have a Complaint?

If you wish to make a complaint about a breach of this Privacy Policy or the privacy principles of the Privacy Act 1988 (Cth), you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint, as well as any supporting evidence and/or information.

We will investigate the issue and determine the steps we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of our determination.

If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au .

1.8 How to Contact us

If you have any questions or concerns about this Privacy Policy or its implementation, please email us at admin@surefact.com.au or call us on 03 8379 3600.