

TravelCard



TCA INSURANCE SERVICES PTY LTD

PRIVACY POLICY

Version	V1.1
Date:	20 March 2018
Prepared by:	Ashlea Hitchcock



Contents

1. OVERVIEW	3
2. WHAT IS PERSONAL INFORMATION.....	3
3. WHAT PERSONAL INFORMATION WE COLLECT.....	3
4. HOW WE USE PERSONAL INFORMATION.....	3
5. HOW WE COLLECT PERSONAL INFORMATION	4
6. HOW WE STORE PERSONAL INFORMATION.....	5
7. WHO WE DISCLOSE PERSONAL INFORMATION TO.....	5
8. WHO WE DISCLOSE TO OVERSEAS.....	6
9. WHAT HAPPENS IF PERSONAL INFORMATION IS NOT DISCLOSED	6
10. CORRECTING PERSONAL INFORMATION	6
11. MARKETING & PERSONAL INFORMATION.....	7
12. WEBSITE, DATA TRACKING AND EMAILS	7
13. INFORMATION ABOUT PROSPECTIVE EMPLOYEES.....	8
14. DEALING WITH US ANNONYMOUSLY OR UNDER A PSEUDONYM.....	8
15. MAKING COMPLAINTS	8
16. CHANGES TO THE TRAVELCARD PRIVACY POLICY	9
VERSION CONTROL	9



1. OVERVIEW

TCA Insurance Services Pty Ltd (TravelCard) is committed to the best practice of good governance, compliance, ethical behaviour and transparency of operation so as to ensure that we provide the best level of service to our customers.

At TravelCard we are committed to managing our customer's information in an open and transparent way. We are bound by the Australian Privacy Principles that are set out in the Privacy Act 1988 (Cth).

2. WHAT IS PERSONAL INFORMATION

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 the information or opinion is recorded in a material form or not.'

Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information.

3. WHAT PERSONAL INFORMATION WE COLLECT

TravelCard will collect a range of personal information and this may include:

- Names, addresses and contact details.
- Date of Birth.
- Sensitive information about health.
- Details of any property insured.
- Details about any journeys insured.
- Proof of Identity.

4. HOW WE USE PERSONAL INFORMATION

We collect personal information so that we can:

- Review suitability of prospective employees;
- Identify the customer and conduct appropriate checks;
- Issuing, processing, administering and managing insurance policies and claims;
- Setting up and administering the TravelCard;



- Manage complaints, the disputes resolution process including referral to the external disputes resolution body;
- Taking any recovery actions;
- Managing the portfolio including data analytics, reporting to insurers and reinsurers
- Market research, conducting competitions, surveys and promotional activities;
- Continuously improving our products and services.

5. HOW WE COLLECT PERSONAL INFORMATION

Wherever possible we will collect personal information directly from the customer over the telephone, in writing, via our online sales portals and emails.

In some circumstances we may collect the personal information from:

- The customer's agent such as their insurance broker;
- The customer's representative including individuals who are legally empowered or instructed to purchase insurance on the customer's behalf;
- Third parties that the customer has instructed to provide information such as any medical practitioners;
- Third parties who are involved in the claims assessment process and may include assessors, investigators, claims managers, witnesses, medical services providers, and the customer's employer;
- Law enforcement, statutory and regulatory bodies;
- External dispute resolution bodies;
- General public; and
- Publicly available sources.

We will not collect, use or disclose sensitive information about our customers unless:

- We are legally required to do so; or
- We need that information for one of our functions or activities and we have the customer's consent.

Sometimes we may receive unsolicited personal information. If so, we will check whether or not that the information is reasonably necessary for our functions or activities and we could have collected directly if we had solicited the information. If it is, we'll handle this information the same way we do with other information we seek. If not, and it is lawful and reasonable to do so, we'll ensure we do the right thing and destroy or de-identify it.



6. HOW WE HOLD PERSONAL INFORMATION

We hold personal information in different ways, mainly in electronic form but from time to time in paper form. The security of our customers personal information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Some of the ways we manage the security of personal information includes:

- Limiting access to the business premises;
- Confidentiality requirements placed on our employees;
- Record management processes;
- Security measures embedded within our various IT infrastructure, IT applications and secure online payment facilities to process payments by credit cards;
- Limiting access by employees to personal information to those specific roles; and
- Electronic security systems, such as firewalls and data encryption on our websites.

Where we hold personal information electronically with third party data storage providers we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

We only keep personal information for as long as we require it for the purposes that it was collected. We are required to keep some personal information for certain periods of time under law. When we no longer require personal information, we'll ensure that it is destroyed or de-identified.

7. WHO WE DISCLOSE PERSONAL INFORMATION TO

We may disclose our customers personal information to a range of parties that may include:

- Our related companies including companies in the PassportCard group
- Our insurers and reinsurers
- Government, law enforcement agency, regulatory or enforcement bodies and agencies as required
- External dispute resolution bodies
- Loss adjustors, assessors, investigators and recovery agents
- Medical and health service providers including case managers, rehabilitation consultants
- Marketing organisations
- The customers employer
- Any agent or contractor of any of the third parties above



We will not disclose any sensitive information for any purpose other than the purpose for which it was collected, or directly related to a secondary purpose unless the customer has provided their consent.

8. WHO WE DISCLOSE TO OVERSEAS

We may hold and disclose personal information overseas, and these locations may include Israel and countries within the European Union. We implement reasonable measures to ensure that an overseas recipient of personal information does not breach the privacy laws in Australia. Where personal information has been disclosed overseas there may be a possibility the recipient may be required to disclose it under foreign law, which is not considered to be a breach under the Privacy Act.

9. WHAT HAPPENS IF PERSONAL INFORMATION IS NOT DISCLOSED

If we ask for personal information and it is not given to us, we may not be able to:

- Provide the customer with any or all of the features and benefits of our products and services;
- Determine the amount of any premiums and associated fees;
- Complete the assessment and determination of any claims;
- Provide information about other products or services or benefits that may be of interest.

10. ACCESS TO AND CORRECTING PERSONAL INFORMATION

We endeavor to ensure that personal information that we collect, use or disclose is accurate, complete, up-to-date and relevant for the purposes for which it was collected. If the customer believes that the personal information that we hold about is inaccurate, out of date, incomplete, irrelevant or misleading then contact our Privacy Officer to inform us so that we can rectify the matter. If we cannot assist with their concerns regarding their personal information we will let them know in writing.

If we agree to correct the personal information, we'll do so within 30 days from when we are asked, or a longer period that has been agreed with the customer.

If we can't make corrections within a 30-day time frame or the agreed time frame, we will:

- Advise about the delay, the reasons for it and when we expect to resolve the matter;
- Ask for agreement in writing to give us more time; and
- Provide details about our Complaints Management Framework or the Office of the Australian Information Commissioner.



Generally, no restrictions or charges apply.

11. MARKETING & PERSONAL INFORMATION

When customers provide us with personal information they consent to its collection and use for marketing purposes unless they advise us otherwise. Marketing may be in the form of mail, SMS, email, telephone or online about news, special offers, products and services.

Our Customers can unsubscribe or contact us to change their marketing preferences at any time.

In order to carry out marketing we may disclose the customers personal information to others that provide us with specialised data matching, trending or analytical services, as well as general marketing services.

We, and other people who provide us with services, may combine the personal information collected from our customers, with the information we, or our related companies, or our service providers already hold. We may also use online targeted marketing, data and audience matching and market segmentation to improve advertising relevance.

12. WEBSITE, DATA TRACKING AND EMAILS

We may use a “cookie” which is a small data file that is placed on the computer of a website user (usually in the browser software folder) for visitors to our website or users of one of our apps.

Cookies are generally used only to facilitate access to secure areas of our websites. We may also derive general information from cookies with respect to our website and app such as:

- statistics relating to the number of visits
- details of the websites visited prior to our website
- previous visits
- pages visited, pages downloaded and time spent on each
- server addresses and IP addresses

Customers can set their internet browser to refuse cookies however this may mean that they are not able to take full advantage of the services and information offered through our websites.

If we communicate electronically we retain the content and associated data of any email that are sent to us if we believe we have a requirement to do so. All emails may be monitored for security issues and quality assurance issues.



We will handle any personal information that is collected through the use of our websites, data tracking or via email will be managed in accordance with this Privacy Policy.

13. INFORMATION ABOUT PROSPECTIVE EMPLOYEES

As part of the employment screening process we generally collect the personal information about prospective employees in order to process and evaluate their suitability for employment. The information that we collect may include:

- Name and residential address;
- Police security clearance;
- Employment reference reviews; and
- Employment history.

We may retain personal information from unsuccessful applicants for up to six months to allow those candidates to be considered for future opportunities.

14. DEALING WITH US ANONYMOUSLY OR UNDER A PSEUDONYM

If an individual has a general enquiry they can choose to do deal with us anonymously or use a pseudonym. However generally, we won't be able to deal with them anonymously or where they are using a pseudonym when:

- it is impracticable; or
- we are required or authorised by law or a court/tribunal order to deal with them personally.

We may offer anonymity in respect of surveys and questionnaires.

15. MAKING COMPLAINTS

If the customer has concerns as to whether there has been a breach of privacy or they do not agree with a decision we have made about access to or correction of personal information, they can make a complaint to our Privacy Officer. We will manage the matter by following our Complaints Management Framework.

If the customer is not happy with the way we have handled their complaint they may refer the matter to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

The Financial Ombudsman Service Ltd

Telephone: 1300 78 08 08

Facsimile: (03) 9613 6399



Email: info@fos.org.au

The Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au/privacy

Mail: GPO Box 5218, Sydney, NSW, 2001.

GPO Box 2999, Canberra, ACT, 2601.

16. CHANGES TO THE TRAVELCARD PRIVACY POLICY

This Policy may change at any time and we will post updated policies on our website. It is important that any party that provides us with their personal information reviews our Privacy Policy from time-to-time to ensure they are aware of any changes. Any changes will be effective on the date that they are published on the websites.

VERSION CONTROL

Version	Date	Author	Changes
V1-0	25 February 2018	Ashlea Hitchcock	Initial Draft
V1-1	20 March 2018	Ashlea Hitchcock	Incorporation of the TC process