

# Privacy Policy

Version Number 1.0

This policy applies to Australian Financial Services Licensee Grange Risk Solutions Pty Ltd (“GRS”), and all our Authorised Representatives. This policy sets out how GRS collect and manage personal information we collect from you. The Privacy Act 1988 requires us to handle personal information in accordance with the Australian Privacy Principles.

## What Type of Personal Information Do We Collect and Why Do We Collect It?

Personal information means information, or an opinion about, an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. When GRS provides you with financial services, we may be required by Corporations Act 2001, Anti-Money Laundering and Counter Terrorism Financing Act 2006 and regulatory requirements to seek to obtain certain personal information about you, including, but not limited to:

- ▶ Your name, date of birth, TFN and contact details.
- ▶ Information regarding dependents and family commitments.
- ▶ Your occupation, employment history, employment circumstances, details family commitments and social security eligibility.
- ▶ Your financial needs and objectives.
- ▶ Your assets and liabilities (current and future), income and expenses.
- ▶ Your superannuation and insurance details.
- ▶ Your investment preferences, attitude or tolerance to investment and financial risk.

## How Do We Collect Personal Information from You?

We collect personal and sensitive information in several ways, including:

- ▶ Directly from you, such as when you provide the information at meetings, by phone, email, in data collection forms and when you visit our websites.
- ▶ Indirectly from fund managers, superannuation funds, life insurance companies and other product issuers once you have authorised us to obtain such information or authorised other parties to provide us with this information.
- ▶ However, we require certain personal information to be able to provide you with the services and information you request. If you do not provide us with certain personal information, we may not be able to provide you with access to those services or respond to your request.

## Are You Obligated to Provide Us Personal Information?

You are not required to provide us the information that we request, or to allow us to collect information from third parties. However, where you choose not to provide us with the information we request, we may not be able to provide you with services that you have requested from us, and we may elect to terminate our arrangement with you. Importantly, if you provide either inaccurate or incomplete information to us, you risk obtaining products or services that may not be appropriate or suitable for your needs and may risk suffering a financial detriment or loss.

## What Happens If We Obtain Information About You Which We Have Not Solicited?

Where we receive unsolicited personal information about you, we will consider if we could have collected the information if we had solicited the information. Where we determine that we could have collected the personal information from you, we will treat your personal information in the same manner as if we have solicited the information directly from you. Where we determine that we could not have collected the personal information, we will destroy the information or ensure that the information is de-identified as soon as practicable.

## How Do We Use Your Personal Information?

We use your personal information for the primary purpose for which the information was obtained. As an AFS Licensee, that will typically mean for the purpose of:

- ▶ Providing financial services to you.
- ▶ Implementing investment or risk management recommendations on your behalf.

We may also use the information for the secondary purpose of attempting to identify other products and services that may be of interest to you. We may also disclose your personal information to external associates and service providers who assist us to market our products and services.

If, at any time, you do not wish to receive this information, you may contact us with this request.

## When We Disclose Your Personal Information?

We may disclose your personal information to the organisations described below.

- ▶ Our Authorised Representatives.
- ▶ The product issuers of products and services that you have elected to acquire, vary, or dispose of using our assistance.

- ▶ Our external service providers.
- ▶ Your professional advisers as authorised by you.
- ▶ Our regulators.

For example, information may be disclosed to the following parties:

- ▶ Product issuers for the purpose of giving effect to the recommendations made by us, and other organisations who support the products and services we offer.
- ▶ Other parties involved in the administration of your financial products or insurance cover (e.g., custodians, credit reporting bodies, actuaries, call centres, mail houses, product registries, any persons who propose to guarantee (or have guaranteed) repayment of any credit provided to you, claims assessors etc).
- ▶ Other professional advisers, including your solicitor or accountant as authorised by you.
- ▶ Our external service providers (e.g., IT providers, professional advisers, and contractors).
- ▶ Government and regulatory authorities and other organisations, as required or authorised by law.
- ▶ Any person considering acquiring, or acquiring, an interest in our business.

## Government Related Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required, authorised by law or unless you have voluntarily consented to disclose this information to any third party.

## Cross-Border Disclosure of Personal Information

We may transfer personal information to related bodies corporate or external service providers in locations outside Australia (including, but not limited to, the United States, Taiwan, Singapore, Finland, Belgium, and Ireland) in the course of storing that information and when using or disclosing it for one of the purposes referred to above. When transferring personal information to foreign jurisdictions, we take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

## Access to Your Personal Information

You may request access to the personal information we hold about you by contacting us at [grsadmin@grangeinsurance.com.au](mailto:grsadmin@grangeinsurance.com.au) (no spam please) or writing to us at **PO Box 624, Mt Hawthorn WA 6915** with your request stating your advisers name and the information you require. We will respond within a reasonable period after the request is made. Where we provide you access to such information, we may charge a reasonable fee to cover our costs. We will disclose the amount of such costs to you prior to providing you with the information.

## Dealing with Us Anonymously

You can deal with us anonymously, or using a pseudonym, where it is lawful and practicable to do so. For example, if you telephone GRS requesting our postal address.

## Accuracy and Correction

To enable us to keep our records properly, please notify us if you believe that any information, we hold about you is inaccurate, incomplete, or out of date and we will take reasonable steps, in the circumstances, to ensure that it is corrected. You can notify us by sending us an e-mail: [grsadmin@grangeinsurance.com.au](mailto:grsadmin@grangeinsurance.com.au) (no spam please) or writing to us at **PO Box 624, Mt Hawthorn WA 6915**.

## Our website

When you visit our website, we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our website and to improve our website.

## Cookies

We use cookies on our website. Cookies are small data files that are downloaded from our website and stored on your computer when you visit our website. Cookies are used to allow us to see which pages and what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to refuse to accept cookies. You can also delete cookies from your computer's hard drive at any time. However, please note that doing so may negatively impact your experience on our website.

## Third Party Sites

Our website has links to other websites that are not owned or controlled by us. We are not responsible for these sites or the consequences of you going on to those sites, except as required by law. Use of link to third party websites is entirely at your own risk.

## Our Security Procedures

GRS takes your privacy and the privacy of its associated entities and their clients very seriously. We will take reasonable steps in the circumstances to protect any personal information you provide to us from misuse, interference or loss and unauthorised access, modification, and disclosure. We will also de-identify and destroy the personal information we hold about you once our legal obligations cease. Our security procedures are reviewed from time to time, and we update them when relevant.

However, please be aware that the transmission of data over the Internet is never guaranteed to be completely secure. It is possible that third parties not under the control of GRS may be able to access or intercept transmissions or private communications without GRS' permission or knowledge. GRS takes all reasonable steps, in the circumstances, to protect your personal information. However, we cannot ensure or warrant the security of any information you transmit to us. Such transmissions are done at your own risk.

## Data Breach Notification

Under the Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth), GRS is required to give notice to the Australian Information Commissioner (**OAIC**) and affected individuals of an "eligible data breach". This means that if we hold personal information about you, and there is unauthorised access to or disclosure of your personal information, and if you, as the "affected individual" would be likely to suffer serious harm from this access or disclosure, we must notify both you and the OAIC.

"Serious harm" could include identity theft, threats to physical safety, economic and financial harm, harm to reputation, embarrassment, discrimination, or harassment. The test is whether a "reasonable person" would expect you to suffer serious harm.

If you are likely to suffer serious harm from a data breach, we will notify you of:

- ▶ the nature of the eligible data breach (i.e., how the information was accessed or disclosed).
- ▶ the type of information that was accessed or disclosed.
- ▶ the steps that we have taken to control or reduce the harm, and those that we plan to take.
- ▶ any assistance we can offer you, such as arranging for credit monitoring.
- ▶ anything that we can suggest you can do to assist yourself or mitigate the harm.
- ▶ whether the breach has also been notified to the OAIC.
- ▶ how you can contact us for information or to complain; and
- ▶ how to make a complaint with the OAIC.

We will notify you using the same method that we usually use to communicate with you. If it is not practicable for us to notify you personally, we will email the notification.

There are some circumstances in which we do not have to notify you of a data breach. These include:

- ▶ where we have taken remedial action before any serious harm has been caused by the breach.
- ▶ if you have been notified of a breach by another entity.
- ▶ if notification would be inconsistent with Commonwealth secrecy laws; or
- ▶ where the Commissioner declares that notification does not have to be given.

Depending on the nature of the breach and the harm, we will also consider informing other third parties such as the police or other regulators or professional bodies.

## Identifiers

We will not adopt as our own, any government identifiers you may provide to us such as TFNs etc.

## Changes to our Privacy Policy

This information relates to our current Privacy Policy. From time to time, we may vary this policy for any reason. We will email any changes to you. By continuing to provide us with your information, you confirm your acceptance of these changes.

## Complaints Resolution

GRS is committed to providing a fair and responsible system for the handling of complaints from parties whose personal information we hold. If you have any concerns regarding the way, we have handled your privacy, please send us an e-mail at [grsadmin@grangeinsurance.com.au](mailto:grsadmin@grangeinsurance.com.au) or write to us at **PO Box 624, Mt Hawthorn WA 6915**. We will address any concerns you have through our complaints handling process and we will inform you of the outcome of your complaint within a reasonable timeframe. However, if after receiving our response, you still consider that your privacy complaint has not been resolved, you may refer your concerns to the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au)

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