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# Liberty Australia - Privacy Policy

## 1. Policy background

Liberty Specialty Markets is a trading name of Liberty Mutual Insurance Company, Australia Branch (ABN 61 086 083 605) incorporated in Massachusetts, USA (the liability of members is limited) (**Liberty**). It is a member of Boston-based Liberty Mutual Group. Liberty is authorised by the Australian Prudential Regulation Authority to write general insurance business in Australia.

Liberty provides a wide range of commercial and specialist general insurance services in Australia. We are committed to protecting the privacy of your personal data.

This Privacy Policy applies to Liberty, its agents and service providers. This explains the main ways Liberty protects your privacy. This Privacy Policy applies to any personal data you provide to Liberty and any personal data Liberty collects about individuals from other sources such as intermediaries or brokers. Personal data is information or opinion that allows others to identify you. It includes your name, date of birth, gender, contact details, health information and financial information. In some jurisdictions personal data may also be called “personal information”. This Privacy Policy uses the term “personal data” for both expressions.

## 2. Why Liberty collects personal data

Liberty collects personal data to administer client relationships and provide the services and products Liberty offers. This includes offering policies of insurance, risk management and claims handling. Liberty may use your personal data to check whether you are eligible for a product or service, provide you with a product or service or help manage the product or service.

Liberty also collects personal data to be able to develop and identify products and services that may interest you, conducting market or customer satisfaction research, developing, establishing and administering alliances and other arrangements with other organisations in relation to the promotion, administration and use of Liberty’s respective products and services. Liberty may also share information with Liberty’s related companies for them to be able to offer you products and services as well.

Generally, the type of personal data Liberty collects includes a person's name, mailing address, telephone number and e-mail address. Applying for a specific product or service may require Liberty to collect specific information from you relating to that product or service. Where Liberty has provided a service or product to you, Liberty will need to collect and store your personal data relating to that product or service. This will

enable Liberty to assist you with any further information or questions you may have about that product or service.

In certain circumstances, Liberty may also collect sensitive information about you. For example, in relation to the policy purchase of, or making a claim under, special casualty insurance, information about your membership of professional or trade associations, health information and criminal record may be required.

If you do not provide the personal data Liberty or other relevant third parties need to offer you specific products or services, Liberty may not be able to provide the appropriate type or level of service.

### **3. How Liberty collects personal data**

Liberty generally collects personal data directly from the relevant individual but in some cases Liberty may collect it indirectly from a third party. For example, an insured's representative (such as a broker) may tell Liberty about other persons wanting the benefit of Liberty's service or the relevant product. An example might be a director, officer, professional or other staff member. Alternatively, Liberty may collect personal data through Liberty's own representatives or through a third party, such as loss adjusters, lawyers, insurers, health care workers, publicly available sources or witnesses to a claim.

### **4. Disclosing information**

Liberty may disclose personal data about you to third parties (including other members of the Liberty Mutual Group) in the normal business of conducting insurance operations, such as providing you with an insurance quote, processing, servicing, administering your insurance policy and claims, our business administration and when required by law. For example, in providing Liberty's services to you Liberty may provide information to other insurers, reinsurers, other insurance intermediaries, Liberty's advisers such as loss adjusters, lawyers and accountants, to facilitate the handling of a claim. Otherwise, Liberty limits the use and disclosure of any personal data provided by Liberty to purposes for which you have consented.

### **5. What Liberty expects of you**

When you provide Liberty with personal data about other individuals, Liberty relies on you to have made or make them aware that you will or may provide their information to Liberty, the purposes for which Liberty will use it, the types of third parties Liberty discloses it to and how they can access or correct their information or make a complaint (as described in this Policy). Liberty relies on you to have obtained their consent to the above. If you have not done either of these things, you must tell Liberty before you provide the relevant personal data.

If Liberty gives you personal data you and your representatives must only use it for the purposes agreed.

## **6. Security of your personal data**

Liberty endeavours to protect any personal data that Liberty hold from misuse, interference and loss, and to protect it from unauthorised access, modification and disclosure. Liberty maintains physical security over Liberty's paper and electronic data stores and premises. Liberty also maintains up-to-date computer and network security. Liberty also imposes clear privacy restrictions on all third parties who will handle your personal data.

Where personal data held by Liberty is no longer needed for any purpose Liberty will securely destroy the information.

## **7. Transborder issues**

Liberty may transfer your personal data overseas, including to countries without comparable data protection laws, if it is reasonably necessary to provide you with the products or services you seek from us. For example, depending on the product or service you have Liberty may transfer information via the Internet or have to provide overseas insurers, reinsurers and other third party providers and their and Liberty's representatives with personal data. Liberty may store your information with third party cloud or other types of networked or electronic storage providers. We also can transfer your personal data to Liberty Mutual Group entities. Third parties may be located overseas in the United States, Canada, United Kingdom, Singapore, Hong Kong or Malaysia. Where relevant these organisations are bound by personal data arrangements.

## **8. Accuracy and access**

Liberty takes reasonable steps to ensure that your personal data is accurate, complete, and up-to-date whenever Liberty collects or uses it. Please contact us if any of the details you have provided change. Please also contact us if the information we have about you is not accurate, complete or up-to-date.

Liberty will, on request, provide you with access to the personal data Liberty holds about you, unless there is a legal exception preventing us from providing you with access to that information. For example, where giving access would have an unreasonable impact on the privacy of another individual Liberty will not provide you with access to that personal data.

If Liberty does not provide you with access, Liberty will provide you with reasons for the refusal and inform you of any legal exceptions relied upon.

Your request to access, correct or update your personal data will be dealt with in a reasonable time. Liberty may recover from you its reasonable cost for retrieving and supplying the requested information to you.

## **9. Opting out of receiving marketing information**

Liberty may use your personal data to offer you products or services Liberty believes may be of interest to you. However, if you do not wish to receive marketing information about Liberty branded products and services please let Liberty know by contacting the Privacy Officer, whose details are provided below. Liberty will act promptly on your request.

## **10. Liberty Australia's website**

You can browse Liberty's website ([www.libertyspecialtymarkets.com.au](http://www.libertyspecialtymarkets.com.au)) (the Site) without having to tell us who you are or revealing any personal data whatsoever. We may use various technologies to passively collect information from you while you are visiting our Site. We do log non-personally identifiable general statistical information such as domain name, Internet Protocol (IP) address, and browser type. For example, we may use "cookies" - sets of information assigned to you by our web server when you visit the Site - only for maintaining information between pages. They are not used for storing or tracking personal data about visitors to the Site. If you wish, you can set your computer to decline cookies. However you are fully responsible for altering your browser software to do this.

We will update this Privacy Policy when any new methods of information collection are introduced on the Site and shall request, whenever possible, your authorisation to add any mechanisms to improve your browsing experience in the Site.

## **11. How to contact us or make a complaint**

If you wish to gain access to or correct your personal data, opt out of receiving marketing information, make a personal data complaint or you have any query regarding how your personal data is collected or used, or any other query relating to Liberty's Privacy Policy, please contact Liberty's Privacy Officer on:

Telephone: 02 8298 5800

Email: [privacy.officer.ap@libertyglobalgroup.com](mailto:privacy.officer.ap@libertyglobalgroup.com)

Mail: The Privacy Officer, Locked Bag 18, Royal Exchange, NSW, 1225

Liberty will respond to your query or complaint as soon as possible and will try to resolve any complaint within 20 business days. If this is not possible, Liberty will contact you within that time to advise you further regarding the resolution of your complaint.