

## **CTM PRIVACY POLICY – CHOOSI CAR INSURANCE AND HOME & CONTENTS INSURANCE**

This Policy contains important information about how Compare the Market Pty Ltd ACN 117 323 (**CTM, we, us, our**) manages personal information it collects via the web pages [www.choosi.com.au/car-insurance](http://www.choosi.com.au/car-insurance) and [www.choosi.com.au/home-and-contents](http://www.choosi.com.au/home-and-contents) (and associated sub-domains) (**Web Pages**). CTM hosts and manages the Web Pages on behalf of Choosi Pty Ltd ACN 147 630 886 (**Choosi**).

We may modify this Policy at any time, and if we do, we'll publish it on the Web Pages. We are bound by the *Privacy Act 1988* (Cth) and the Privacy Principles contained within that act.

### **PERSONAL INFORMATION WE COLLECT**

#### Personal Information

The type of information we collect about you will depend on the circumstances, but will generally include information which is relevant to the quoting or supply of car insurance and/or home & contents insurance products or services you're comparing or enquiring about. Where practicable, we will always allow you to deal with us anonymously or by using a pseudonym. We may collect personal information from you to provide you with a comparison service or to allow a supplier who participates in our comparison service, or a business partner who assists us in providing our comparison service, to contact you. In some cases, if you do not provide the information we will not be able to provide our services to you.

The information may include, depending on the service you require, your name, address, date of birth, gender, insurance history, employment information, marital status, proof of identification information, bank account or credit card details, details about the risk you want to insure, details regarding your financial circumstances and future requirements and your contact details. If you win a competition that we (or our agents) run, we may also with your consent use your name, image (e.g. photograph) and/or voice recordings for the purpose of promoting or marketing the competition and/or our services.

#### Sensitive Information

We may also, where necessary, collect sensitive information from you. Sensitive information includes any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.

### **HOW WE COLLECT AND HOLD PERSONAL INFORMATION**

We generally only collect your personal information from you directly via the internet, including the Web Pages and social media. Sometimes, we may collect your personal information from one of our participating suppliers (e.g. where you purchase a policy from that supplier). We may also collect information from another person (e.g. the person arranging the policy of insurance). If we collect information about you from a third party, we will determine whether we could have lawfully collected that information directly from you and, if not, we will destroy or de-identify that information (provided it's lawful to do so).

Any personal information that you provide for a comparison or to purchase products or services on the Web Pages is collected and managed by CTM. Personal information that you provide to purchase products or services on third party Web Pages which are linked to by us is collected and managed by those third parties.

If CTM collects feedback from users of the Web Pages, we will give you the option to provide that feedback anonymously however, you can provide your personal information with your feedback if you choose.

From time to time, we may use data collection devices such as 'cookies' in conjunction with the Web Pages. We may (or our marketing company may) evaluate any cookie information collected to measure the effectiveness of its advertising and how visitors use the Web Pages in order to:

- provide you with a better and more customised service and a more effective Web Pages; and
- collect information on how many visitors the Web Pages receive, how those visitors use the Web Pages, where they came from and where they go.

We also use web beacons and cookies provided by our third party ad server on the Web Pages, which transmit information about how visitors use the Web Pages to our ad servers so that advertising on third party sites can be better targeted and measured. You can configure your browser so it does not accept cookies, but this may affect the functionality of the Web Pages. We may also collect and store information on your personal device using browser web storage and data caches.

We hold personal information in data storage and cloud computing facilities operated by us (or by third parties for us). We take all reasonable steps to protect the information from unauthorised access, misuse, interference or disclosure.

## **WHY WE COLLECT, HOLD AND USE PERSONAL INFORMATION**

We collect, hold and use personal information to provide services, benefits and products to you. These include:

- to allow you to compare products and/or obtain quotes for products or make enquiries;
- to send you a summary of your quote and comparison results;
- to provide to our business partners, including Choosi, or participating suppliers so that they can (where you have agreed) provide you with updates or information about their products and services and provide you with reminders;
- to reconcile transactions with our business partners or participating suppliers that supply you products because of our services;
- unless you object, to communicate with you and make special offers to you;
- unless you object, to direct market our services to you;
- to deal with complaints and queries you may have.

If we disclose your personal information to our business partners (e.g. Choosi) or participating suppliers, they will use, deal with and manage your personal information in accordance with their privacy policies. We will never sell your personal information to other companies. You may access Choosi's privacy policy by clicking here [www.choosi.com.au/privacy-policy](http://www.choosi.com.au/privacy-policy).

We may share your personal information with third parties if we genuinely believe that the sharing of that personal information is required or authorised under law.

CTM may record details or block particular I.P. addresses (and where required provide those details to third parties to assist us) to maintain the integrity of the Web Pages where there is suspicious or excessive use of the Web Pages.

Some of our service providers and/or business partners may be located in overseas locations. If we are permitted by law to do so, we may disclose your personal information to these providers or

partners to provide our services to you. Currently, these locations include the United States of America.

## ACCESS TO YOUR PERSONAL INFORMATION

You have the right to access and correct your personal information we hold. In certain situations (e.g. if required or permitted by law), we are able to deny access to some or all of the personal information we hold. We will always provide reasons in writing if access is refused. We may charge you a reasonable fee for access to your personal information, but we will advise you of the fee before we process your request. We will always respond to requests for access and/or corrections within a reasonable period and we will give access in the manner requested if it is reasonable and practicable to do so. Please email or write to our Privacy Officer (see Contact Information) if you wish to access or correct your personal information.

If you provide us with information about another person, you must have that person's consent before you provide the information to us. You must also tell the person we have collected their personal information; the person is entitled to access the information we hold; and he or she should refer to this document to understand how we manage their personal information.

## KEEPING YOUR PERSONAL INFORMATION SECURE

There is always a risk in sending and receiving information over the internet, but once we have received your personal information, we'll take steps to make sure it is protected and secure.

## PRIVACY COMPLAINTS

If you have a complaint about the way we manage your personal information, including any decision made regarding a request for access or correction of your personal information, please contact our Compliance Manager (see Contact Information):

Our Compliance Manager will endeavour to resolve any privacy complaints and will respond in writing to you regarding the outcome of any investigation. If your privacy concerns are not resolved satisfactorily or you wish to obtain more information on the privacy legislation, you can contact the Office of the Australian Information Commissioner (see Contact Information).

## CONTACT INFORMATION

### Privacy Officer

PO Box 301, Toowong QLD  
4066

[privacy@comparethemarket.com.au](mailto:privacy@comparethemarket.com.au)

### Compliance Manager

PO Box 301, Toowong QLD 4066

[privacy@comparethemarket.com.au](mailto:privacy@comparethemarket.com.au)

### Office of the Australian Information Commissioner

GPO Box 5218  
Sydney NSW 2001  
Phone: 1300 363 992  
[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

[www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)

Last Updated: 12 February 2015