

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 and www.choosi.com.au/home-contents-insurance (and associated subdomains) (**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 that 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 that 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](#).

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.

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 they should refer to this document to understand how we manage their personal information.

If you provide us with a false email or mobile number, we may be unable to provide you with the requested information or your quote summary, and personal information may be accessible to a third party. To safeguard personal information that may be accessible from communications from us, we recommend that you only provide us with contact details over which you maintain access and control.

KEEPING YOUR PERSONAL INFORMATION SECURE

We generally store personal information on networks in Australia.

We will take reasonable precautions to ensure that the personal information that we have about you is protected against any unlawful use, unauthorised access, modification or disclosure and these precautions include:

- using appropriate information technology and processes;
- using computer and network security systems with appropriate firewalls, encryption technology and passwords for the protection of electronic files;
- securely destroying or "de-identifying" personal information if we no longer require it subject to our legal obligations to keep some information for certain prescribed periods; and
- restricting access to your personal information to our employees and those who perform services for us who need your personal information to do what we have engaged them to do;
- requesting certain personal information from you when you wish to discuss any issues relating to the products and services we provide to you.

While we undertake reasonable steps to protect your personal information, no guarantee can be given that information sent over the internet is always 100% secure. Sending and receiving information over the internet is at the user's own risk, however we will take all reasonable steps to ensure your data security once we receive it.

If we believe or suspect that the security of your Personal Information has been compromised, we may attempt to notify you electronically so that you can take steps to protect yourself from harm.

Where reasonably possible, we will destroy or de-identify your information if it is no longer required for the purpose for which it was collected or any related purpose (subject to any relevant record keeping obligations under Australian law).

Transfer of information outside Australia

In some cases, your information may be transferred or stored outside Australia as some of our service and software providers and/or business partners may be located in overseas locations.

We hold personal information in data storage and cloud computing facilities operated by us (or by third parties for us) that may be in overseas locations. Currently, we maintain a database of personal information (primarily name, email address and phone number) with overseas providers who are in the USA. To ensure the security of your information, we have a dedicated database and additional encryption.

As some of our internal business systems are supported by cloud computing facilities there is also potential for personal information to be incidentally transferred to our overseas providers who are in the USA and EU in the usual course of business.

Please note that some of our participating suppliers may operate call centres that are based overseas, and so if you enquire about a product with them, you may call or be called by one of those call centres. If you provide information to a participating supplier, the collection, storage and use of that information will be managed by the participating supplier and subject to their privacy policy.

WHEN WE DISCLOSE PERSONAL INFORMATION

We do not sell, license or otherwise disclose your Personal Information to third parties unless such disclosure is for the purposes set out in this Privacy Policy.

Participating suppliers

We may provide your information to participating suppliers to enable suppliers to provide products and services to you. This may include providing your information to a supplier:

- if you wish to obtain a quote for products or services (in some cases, your personal information will be relevant to calculating the cost of the products or services offered to you); and
- if you decide to enter into an agreement with that supplier or wish to obtain further information.

Third party affiliates and service providers

We may provide your information to our third-party affiliates who carry out services on our behalf or to service provider to enable service providers to perform business functions for us. Whenever possible, we require such third parties to only collect and use Personal Information in accordance with this Policy, and for no purpose other than providing us with our requested services. This may include service providers we engage to supply prizes to you on our behalf.

Co-branding

If you use a product or service that is co-branded or that is part of a joint promotion involving us and one or more third parties, your information may be collected by each party. Generally, we do not control the management or use of information by third parties. You should consult each respective privacy policy to confirm how each party will management and use your information.

Legal requirements

We may disclosure your information if, in our reasonable opinion, we are legally bound to do so or if such disclosure is necessary to prevent harm to ourselves, other users or third parties. We will notify you of such disclosures.

Change of ownership

If there is a change of control in respect of our company, your information may become accessible by a third party if we are required to transfer assets to them.

Interactive platforms

Any personal information that you submit, display or publish on an online platform or website, including social media, is publicly available and may be read, collected, used and disclosed by us or other users of those platforms subject to the terms of use of those sites. If you decide to interact with us via social media, your limited data from your social media profile may be collected and provided to us or other third parties.

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:	Office of the Australian Information Commissioner:
Phone: (07) 3198 8018 Email: privacy@comparethemarket.com.au PO Box 301, Toowong QLD 4066	Phone: 1300 363 992 Email: enquiries@oaic.gov.au GPO Box 5218, Sydney NSW 2001 Website: www.oaic.gov.au/privacy

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