Our Privacy Policy

SCOTT WINTON

EST. 1992

Scott Winton Nominees Pty Ltd (ABN 90 630 671 019 | CAR No. 001320904) ("Scott Winton") operates as a Corporate Authorised Representative of **Network Insurance House Broking Pty Ltd** (ABN 95 159 898 398 | AFSL 435538). As the authorising licensee, Network Insurance House Broking Pty Ltd is legally responsible for the financial services provided to you and manages the privacy framework outlined in this policy.

Both Scott Winton and Network Insurance House Broking Pty Ltd, including related entities and appointed authorised representatives, are committed to protecting your privacy in accordance with the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles.

This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws and how you can access the personal information we hold and how to have that information corrected.

What information do we collect and how do we use it?

When we arrange insurance on your behalf, we ask you for the information we need to advise you about your insurance needs and management of your risks. This can include a broad range of information ranging from your name, address, contact details, age to other information about your personal affairs including your assets, personal belongings, financial situation, health and wellbeing. We provide any information that the insurers or intermediaries who we ask to quote for your insurances and premium funding require to enable them to decide whether to insure you and on what terms or to fund your premium and on what terms.

Insurers may in turn pass on this information to their reinsurers. Some of these companies are located outside Australia. For example, if we seek insurance terms from an overseas insurer (e.g. Lloyd's of London), your personal information may be disclosed to the insurer. If this is likely to happen, we inform you of where the insurer is located, if it is possible to do so.

When you make a claim under your policy, we assist you by collecting information about your claim. Sometimes we also need to collect information about you from others. We provide this information to your insurer (or anyone your insurer has appointed to assist it to consider your claim, e.g. loss adjusters, medical brokers etc) to enable it to consider your claim. Again, this information may be passed on to reinsurers.

The information we collect from you may also be shared with other departments and related companies within the Network Insurance House Group of companies. When you provide your information to us, you agree to us sharing this information unless you tell us otherwise. If you would prefer that we do not use your information in this way, please let us know using the contact details below.

From time to time, we will use your contact details to send you direct marketing communications including offers, updates and newsletters that are relevant to the services we provide. We always give you the option of electing not to receive these communications in the future. You can unsubscribe by notifying us and we will no longer send this information to you.

What if you don't provide some information to us?

We can only fully advise you and assist in arranging your insurance or with a claim, if we have all relevant information. The insurance laws also require you to provide your insurers with the information they need in order to be able to decide whether to insure you and on what terms. You have a duty to disclose the information which relevant to the insurer's decision to insure you. If you do not provide this information, we may be unable to provide our services to you.

When do we disclose your information overseas?

If you ask us to seek insurance terms and we recommend an overseas insurer, we may be required to disclose the information to the insurer located outside Australia. For example, if we recommend a policy provided by Lloyd's of London, your information may be given to the Lloyd's broker and underwriters at Lloyd's of London to make a decision about whether to insure you.

We will tell you at time of advising on your insurance if they are overseas and in which country the insurer is located. If the insurer is not regulated by laws which protects your information in a way that is similar to the Privacy Act, we will seek your consent before disclosing your information to that insurer.

Australian and overseas insurers acquire reinsurance from reinsurance companies that are located throughout the world so in some cases your information may be disclosed to them for assessment of risks and in order to provide reinsurance to your insurer. We do not make this disclosure, this is made by the insurer (if necessary) for the placement for their reinsurance program.

We may also disclose information we collect to the providers of our policy administration and broking systems that help us to provide our products and services to you. Where we disclose or transfer personal information to overseas service providers who maintain our administration and broking systems such as in New Zealand, the Philippines, and Vietnam, we take reasonable steps to ensure they handle your information in accordance with the Privacy Act and Australian Privacy Principles.

How do we hold and protect your information?

We strive to maintain the reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements. We hold the information we collect from you initially in a working file, which when completed is electronically imaged and stored, after which any paper is destroyed in our onsite shredder. In some cases, your file is archived and sent to an external data storage provider for a period of time. We only use storage providers located in Australia who are also regulated by the Privacy Act.

We ensure that your information is safe by protecting it from unauthorised access, modification and disclosure. We maintain physical security over our paper and electronic data and premises, by using locks and security systems. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to computer systems where your information is stored.

Will we disclose the information we collect to anyone?

We do not sell, trade, or rent your personal information to others.

We may need to provide your information to contractors who supply services to us, e.g. to handle mailings on our behalf, external data storage providers or to other companies in the event of a corporate sale, merger, re-organisation, dissolution or similar event. We may also disclose information we collect to the providers of our policy administration and broking systems that help us to provide our products and services to you. However, we will take reasonable measures to ensure that they protect your information as required under the Privacy Act.

We may provide your information to others if we are required to do so by law, you consent to the disclosure or under some unusual other circumstances which the Privacy Act permits.

Automated systems and decision making

We use software tools, digital broking platforms, and automated workflows to support our insurance broking, premium funding, and administrative services.

Under Australian Privacy Principle (APP) 1.7–1.9, we disclose how personal information is processed by these systems where decisions affect your insurance cover or rights.

PERSONAL INFORMATION USED

Depending on the insurance product or service sought, our systems process:

- Full name, address, contact numbers email address and date of birth.
- Information regarding insured property, asset locations, vehicle details, business operations, and geographic risk markers, such as postcode.
- Past claims history, policy loss records, policy history, and duty of disclosure declarations.
- Payment history, premium funding applications, bank or credit details, and broker fee structures.

SOLELY AUTOMATED DECISIONS (NO HUMAN INTERVENTION)

- For eligible retail policies, automated systems process existing policy data, claims history, sums insured or client submitted updates to directly generate, and issue quotes or renewal offers.
- Personal information is processed without human intervention only for standard system calculations such as broker administration fees, credit card surcharges, or merchant service fees applied directly at transaction.

We do not make final policy binding or cancellation decisions solely via software without human involvement.

ASSISTED DECISIONS (HYBRID / HUMAN INTERVENTION)

In most instances, software tools perform automated scoring, rating, or functions that directly inform the final decision made by our qualified advisors:

- Comparative quoting tools process your risk details against insurer algorithms to generate risk ratings, options, and pricing presented by qualified advisor.
- Financial assessment tools calculate credit eligibility, interest rates, and repayment schedules for requested premium funding.

How can you check, update or change the information we are holding?

Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information please write to our Privacy Officer at:

Email: privacy@nih.com.au

Mail: Network Insurance House
PO Box 3190
Tuggerah NSW 2259

We do not charge for receiving a request for access to personal information or for complying with a correction request. Where the information requested is not a straightforward issue and will involve considerable amount of time then a charge will need to be confirmed for responding to the request for the information.

In some limited cases, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

What happens if you want to complain?

If you have concerns about whether we have complied with the Privacy Act or this Privacy Policy when collecting or handling your personal information, please write to our Complaints Officer at:

Email: complaints@nih.com.au

Mail: Network Insurance House
PO Box 3190
Tuggerah NSW 2259

Your complaint will be considered by us through our internal complaints resolution process. We will acknowledge your complaint within 24 hours and we will respond with a decision within 30 days of you making the complaint.

For further information about our Complaints handling process see our website: nih.com.au.

Your consent

By asking us to assist with your insurance needs, you consent to the collection and use of the information you have provided to us for the purposes described above.

Website information and content

The information provided on our websites does not cover all aspects of the law on the relevant subject matter. Professional advice should be sought before any action is taken based upon the matters described and discussed on this site.

To the extent permitted by law, we make no representations about the suitability of the content of the sites for any purpose. All content is provided without any warranty of any kind. We disclaim all warranties and conditions with regard to the content, including but not limited to all implied warranties and conditions of fitness for a particular purpose, title and non-infringement.

We will not be liable for any damages or injury caused by, including but not limited to, any failure of performance, error, omission, interruption, defect, delay in operation of transmission, computer virus, or line failure. To the extent permitted by law we will not be liable for any damages or injury, including but not limited to, special or consequential damages that result from the use of, or the inability to use, the materials in the sites.

We believe the content of our sites to be accurate, complete and current, however there are no warranties as to the accuracy, completeness or currency of the content. It is your responsibility to verify any information before relying on it. The content of our websites may include technical inaccuracies or typographical errors. We reserve the right to modify the content of this site from time to time.

ANONYMOUS DATA

We use technology to collect anonymous information about the use of our website, for example when you browse our websites our service provider logs your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our websites, to better understand our clients and markets and to improve our services.

COOKIES

In order to collect this anonymous data we may use "cookies". Cookies are small pieces of information which are sent to your browser and stored on your computer's hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. Once you leave our sites, the cookie is destroyed and no personal or other information about you is stored.

ADVERTISING COOKIES

We may use cookies and ad technology to help us serve relevant ads to you more effectively. They also help us collect aggregated audit data, research, and performance reporting for advertisers. They enable us to understand and improve the delivery of ads to you, and know when certain ads have been shown to you. Since your web browser may request advertisements and web beacons directly from ad network servers, these networks can view, edit, or set their own cookies, just as if you had requested a web page from their site.

Although we do not use cookies to create a profile of your browsing behaviour on third-party sites, we do use aggregate data from third parties to show you relevant, interest-based advertising. We do not provide any personal information that we collect to advertisers.

You can opt out of off-site and third-party-informed advertising by adjusting your cookie settings. Opting out will not remove advertising from the pages you visit, but, instead, opting out will result in the ads you see not being matched to your interests. This implies that the ad(s) you see will not be matched to your interests by those specific cookies.

If you prefer not to receive or activate cookies you can adjust your internet browser to refuse or warn you when cookies are being used. You can also disable other specific cookies by updating your ad preferences in the setting section of a platform or social media website such as Google, Facebook and LinkedIn. Disabling certain cookies may impact on the functionality of our websites and your web experience.

FORMS

Our Websites allow visitors to submit information via Self-Service forms (Application Forms, Claim Forms, Employment and Contact request). The information submitted via the Forms may not be encrypted – an option is available for forms to be downloaded in PDF format for faxing or emailing. Should you be concerned about confidentiality of the information included in a form, this would be the recommended method.

Information collected via on-line forms is sent to our offices via EMAIL (possibly not encrypted) and is also stored on a database which is accessible by our staff only and is password protected.

We also use your information to send you requested product information and promotional material and to enable us to manage your ongoing requirements, e.g. renewals, and our relationship with you, e.g. invoicing, client surveys etc.

We may occasionally send you direct marketing about new services and special offers, events or articles we think will be of interest to you. We may send you regular updates by email or by post on insurance matters. If you would rather not receive this information or do not wish to receive it electronically, you can tell us using the opt-out facility provided or email or write to us.

We may use your information internally to help us improve our services and help resolve any problems.