

Privacy Policy – Easicover Pty Ltd (ACN 684 264 257)

In this Privacy Policy, 'us' 'we' or 'our' means Easicover Pty Ltd (ACN 684 264 257). We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your Personal Information.

By providing Personal Information to us, you agree to our collection, use and disclosure of your Personal Information in accordance with this Privacy Policy and any other arrangements that apply between us.

We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

1 Definitions

1.1 In this Privacy Policy, the following capitalised terms have the following meanings:

Data Protection Laws mean the Privacy Act.

Non-personal Information means information that does not relate to a person and/or cannot be used to identify a person.

Online Platform means any website, application, platform, software, landing page, plugin, API or any other digital product, interface or service offered by us.

Personal Information means any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

Privacy Act means the *Privacy Act 1998* (Cth).

Products mean any goods or services offered by us, which may include the provision of any Online Platform.

2 What information do we collect?

Information you voluntarily provide to us: We collect information about you and your interactions with us, for example, when you purchase or use any of our Products, call us, interact with any of our Online Platforms or otherwise visit our website. This usually includes (without limitation) the following information which may include Personal Information:

- (a) your name and contact information such as email address and phone number;
- (b) name and address of your organisation (if applicable);
- (c) business information including business name, ABN/ACN, trading name, business structure, industry sector, nature of business activities, years in operation, annual revenue or turnover, and number of employees;
- (d) details of directors, partners, key personnel or authorized representatives of your business;

- (e) insurance-related information including details of current or previous insurance policies, coverage requirements, claims history, business premises details (including address, ownership status, and property value), business assets (including equipment, stock, and vehicles), and other information relevant to assessing insurance needs and underwriting;
- (f) financial information relevant to insurance purposes, including payment details for premiums and basic financial information required for underwriting assessments;
- (g) history of purchases and use of our Products and details of enquiries or complaints you make; and
- (h) login credentials for third-party websites (if you use such third-party accounts to log in into our Online Platforms).

2.2 **Information we automatically collect:** We also automatically collect certain technical data that is sent to us from the computer, mobile device and/or browser through which you access the Online Platforms (**Automatic Data**). Automatic Data, includes without limitation, a unique identifier associated with your access device and/or browser (including, for example, your Internet Protocol (IP) address), characteristics about your access device and/or browser, statistics on your activities on the Online Platforms, details of the Products we have supplied to you or that you have enquired about, including any additional information necessary to deliver those Products and respond to your enquiries, or information about how you came to the Online Platforms. We collect Automatic Data based on your consent which was granted to us by you when you registered as a user and accepted this Privacy Policy.

2.3 **Information we obtain from others:** We may also collect or receive Personal Information from third-party sources, such as other users, suppliers, social media or other third-party integrations, and publicly available sources such as ASIC records.

2.4 **Non-Personal Information:** When you interact with the Online Platforms, we may collect Non-Personal Information. The limitations and requirements of this Privacy Policy on our collection, use, disclosure, transfer and storage/retention of Personal Information do not apply to Non-Personal Information. When you register to the Online Platforms or otherwise submit Personal Information to us, we may associate other Non-Personal Information (including Non-Personal Information we collect from third parties) with your Personal Information. At such instance, we will treat any such combined data as your Personal Information until such time as it can no longer be associated with you or used to identify you.

3 Why do we collect, use and disclose Personal Information?

- 3.1 We may collect, hold, use and disclose your Personal Information for the following purposes:
- (a) provide you with Products and access to the Online Platforms, and manage our relationship with you, including arranging insurance coverage, obtaining insurance quotes, facilitating policy placements, managing policy renewals, assisting with claims, and providing ongoing insurance advice and services;
 - (b) to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
 - (c) to operate, protect, improve and optimise our Products, business and our users' experience, such as to perform analytics and conduct research;
 - (d) to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
 - (e) to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners; and
 - (f) to comply with our legal obligations, resolve any disputes that we may have with any of our users or customers, and enforce our agreements with third parties.
- 3.2 The information we collect is not distributed, sold or leased to third parties for commercial purposes, except to provide Products you have requested or for other purposes when we have your permission or when we are obliged to do so. However, we do share your Personal Information with insurers, underwriters, reinsurers and other parties as necessary to arrange insurance coverage, obtain quotes, process applications, and assist with claims on your behalf.
- 3.3 Automated Processing: Our service is an AI-powered solution that enables you to procure the insurance products your business requires. Your information, including Personal Information, will be processed automatically by us to provide the Products to you. We have put in place reasonable AI guardrails to ensure the automated processing does not unduly prejudice your interests. You acknowledge and agree to this automated processing and understand that it is a core part of our service.
- 3.4 Training: We may use your information, including your Personal Information but only after it has been anonymised and/or aggregated so that it no longer identifies you, to train and test our AI-powered services. This is to improve our AI engines and to develop new products or services for our clients.

4 To whom do we disclose your Personal Information?

- 4.1 We may disclose Personal Information for the purposes described in this Privacy Policy to:
- (a) our employees and staff members;
 - (b) our related bodies corporate;
 - (c) third-party suppliers and service providers who are relevant for our provision of the Products to you, including insurers, underwriters, reinsurers, insurance reference bureaus, loss adjusters, claims investigators, assessors, premium funding providers, and other insurance intermediaries;
 - (d) our professional advisers, dealers, stakeholders and agents;
 - (e) our sponsors or promoters of any competition that we conduct via our Products;
 - (f) anyone to whom our assets or businesses (or any part of them) are transferred;
 - (g) anyone you have specifically agreed can receive Personal Information, or where such consent can be reasonably inferred from the circumstances; and/or
 - (h) other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

5 Do we use your personal information for marketing?

- 5.1 We will use your Personal Information to offer you Products we believe may interest you, but we will not do so if you tell us not to. These Products may be offered by us, our related companies, our other business partners or our service providers.
- 5.2 Where you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

6 Using our Online Platforms and cookies

- 6.1 We may collect Personal Information about you when you use and access our Online Platforms. While we do not use browsing information to identify you personally, we may record certain information about your use of our Online Platforms, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.
- 6.2 We also use cookies, web beacons and other tracking technologies to collect certain information about your equipment, browsing actions, and patterns. Below we describe what are cookies and web beacons, why we use cookies and web beacons, the types of cookies and web beacons that we use as well as what you can do in order to manage and delete cookies and web beacons.

What are cookies and web beacons?

- (a) Cookies are small text files that websites often store on computer hard drives or mobile devices of visitors to their websites. A cookie contains a unique number, which is used to recognise your computer or mobile device when you return to our Online Platforms. Cookies can remain on your computer or mobile device for different periods of time. The cookies can be either "persistent" cookies or "session" cookies. Persistent cookies are stored by a web browser and remain valid until a set expiration date. Session cookies only exist while your internet browser is open and are automatically deleted once you close your browser.
- (b) Web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) are small electronic files contained on pages of websites that permit companies to count users who have visited certain webpages on a website and are used for other related website statistics (e.g., recording the popularity of certain website content and verifying system and server integrity).

What do we use cookies and web beacons for?

- 6.3 We use a variety of cookies, web beacons and other tracking technologies for different purposes. Specifically, we use cookies and web beacons to enhance the experience of our visitors to our Online Platforms (for example, by remembering your preferences and letting you navigate between pages efficiently) and to better understand how our Online Platforms are used. Cookies may tell us, for example, whether you have visited our Online Platforms before or whether you are a new visitor.
- 6.4 We may also use cookies to enable us to collect data that may include Personal Information. For example, where a cookie is linked to your account, it will be considered Personal Information under the Privacy Act. We will handle any Personal Information collected by cookies in the same way that we handle all other Personal Information as described in this Privacy Policy.

What types of cookies and web beacons are used by us?

- 6.5 We use both first-party and third-party cookies and web beacons. First-party cookies and web beacons are cookies and web beacons that are served directly by us to your computer or mobile device. Third-party cookies and web beacons are served by a third-party service provider on our behalf. Third-party cookies are most commonly used for advertising and analytics purposes.
- 6.6 There are four categories of cookies and web beacons used by us. Specifically, we use essential, performance, functionality and advertising cookies and web beacons.
 - (a) Essential cookies, web beacons and other tracking technologies are necessary for the operation of our Online Platforms. These tracking technologies enable you to move around on our Online Platforms and use our Online Platform features. You may not opt out of these types of cookies because they are required to operate our Online Platforms.
 - (b) Performance cookies, web beacons and other tracking technologies collect information about how you have used our Online Platforms. We use performance cookies, web beacons and other tracking technologies to improve the user experience with our Online Platforms.

- (c) Functionality cookies, web beacons and other tracking technologies allow us to remember how you are logged into our Online Platforms, when you logged in or out and the actions you have taken while you have been logged into our Online Platforms.
- (d) Advertising cookies, web beacons and other tracking technologies are used by our third-party service providers to deliver advertising to you on other third-party websites as well as help measure the effectiveness of our advertising campaigns. We also use these types of cookies to analyse our Online Platforms' visits and ad conversions from third-party websites.

What are your choices about cookies?

- 6.7 It is your choice as to whether or not to accept cookies. Most browsers allow you to configure the browser settings so that cookies from websites cannot be placed on your computer or mobile device. If you choose not to accept cookies, then you may be able to continue browsing our Online Platforms but we may not be able to provide you with certain features. If you would like further information about cookies and how to manage and delete them, please visit www.allaboutcookies.org or www.youronlinechoices.eu.

7 How do we store and hold Personal Information?

We hold your Personal Information in electronic form. We take reasonable steps to protect your Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your Personal Information in accordance with our own security controls. However, we cannot guarantee the security of your Personal Information.

8 Processing and transfer of your Personal Information

- 8.1 Your information, including Personal Information, is processed at our operating office in Australia and in any other places where our staff members are located or where subprocessing takes place. Depending on where you are located, this may mean that your Personal Information is transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those from your jurisdiction.
- 8.2 Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.
- 8.3 We will take steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Information will take place to an organisation or a country unless there are adequate controls in place including the security of your data and Personal Information.

9 Retention

- 9.1 Ordinarily, we will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy.
- 9.2 If you are a registered user for any Online Platforms, then we usually will retain your Personal Information as long as you maintain your account and for a period of 24 months following the account's closure, or such longer period as may be required by law, regulatory requirements, or to address potential insurance claims.
- 9.3 You may close your account by contacting us. However, we may sometimes retain Personal Information for an additional period as is permitted or required under applicable laws. Even if we delete your Personal Information it may persist on backup or archival media for an additional period of time for legal, tax or regulatory reasons or for legitimate and lawful business purposes.

10 Exclusions

- 10.1 **Links:** Our Online Platforms may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.
- 10.2 **Personal Information Provided to Others:** This Privacy Policy does not apply to any Personal Information that you provide to another user or visitor through the Online Platforms or through any other means, or information posted by you to any public areas of the Online Platforms.

11 Accessing or correcting your Personal Information

- 11.1 You can access the Personal Information we hold about you by contacting us. Sometimes, we may not be able to provide you with access to all of your Personal Information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your Personal Information.
- 11.2 If you think that any Personal Information we hold about you is inaccurate, please email us and we will take reasonable steps to ensure that it is corrected.
- 11.3 We will consider and respond to all requests in accordance with all applicable laws.

12 Making a complaint

- 12.1 If you think we have breached the Privacy Act or any other relevant privacy law, or you wish to make a complaint about the way we have handled your Personal Information, you can contact us. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.
- 12.2 If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

13 Contact Us

- 13.1 For further information about our Privacy Policy or practices, or to access or correct your Personal Information, or make a complaint, please contact us at

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