

## Privacy Policy

1 July 2020

### Purpose of this policy

This Policy explains how we comply with applicable privacy requirements and sets out minimum standards for how we deal with personal information collected, used, stored, and disclosed by the AMP Life Group. This information may be updated from time to time, and should be read in the context of any additional specific information such as that provided in privacy collection notices and statements included in documentation we provide to you depending on your relationship with us.

“We, our, us or AMP Life Group” means Resolution Life NOHC Pty Limited and all its related entities in the AMP Life Group of companies in Australia and New Zealand. The AMP Life Group’s overall approach for complying with applicable privacy requirements includes:

- commitment to complying with all privacy requirements,
- our approach to managing privacy, as explained in this document,
- the resources allocated to privacy, including technology systems and services, and
- training our employees.

We are committed to protecting your privacy. When we request personal information, we will normally explain why we need it, how it will be used and who we may share it with. At all times we will comply with the terms of this policy when handling your personal information.

This Policy will be updated when our information handling practices change, or to account for new laws and technology. Any amendments will apply to the information we hold at the time of the update. We will post the updated Policy on our website and encourage you to check our website from time to time to view our current policy or contact us for a printed copy.

### Collecting your personal information

When you deal with us, we may ask for a range of personal information, limited to what we need, to assist us in providing you with relevant financial products and services, assisting with your questions and complaints, internal operations such as record keeping, data analytics, auditing or training and complying with our legal and regulatory obligations. We understand some information is more sensitive so we will be clear about why we are collecting it, what we intend to use it for and how we will protect it.

The types of personal information we collect will depend on your relationship with us, such as whether you are an AMP Life customer including a policyholder, website user, job applicant, employee (in applicable jurisdictions), a claimant or another third party (such as an existing or potential business partner).



The information we request could include (but is not limited to) name, address, date of birth, contact details, gender, income, assets and liabilities, account balances, tax and financial statements, government related identifiers, health information, employment details, domicile and citizenship status.

We may also collect information about you from third parties, such as:

- employers,
- when a new employee joins their superannuation or insurance plan,
- parents or guardians in respect of children,
- persons authorised by you such as lawyers or accountants,
- other credit providers,
- publicly available sources of information such as internet search engines or social networking services,
- market research organisations through surveys or telephone polls,
- third-party brokers such as insurance and mortgage brokers,
- credit reporting bodies, and
- agencies such as the Australian Taxation Office.

Most of the personal information we collect will be directly from you. We gather this information either through application forms or other forms that you complete and submit to us (in writing and digitally), and by recording the information you provide via phone calls and interviews.

We only collect your information from external sources if it is impractical to collect it directly from you, or when we are permitted to do so. When we do so, we ensure that we have a legal basis for using your personal information, such as to enable us to contact you and offer our products and services to you.

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may only be able to provide you with limited information or services. However, in many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.

## Using your personal information

Generally, we use your personal information for our business and related activities, and in our efforts to improve our business. Examples include:

- to identify you, respond to and process your requests for information and provide you with a product or service,
- to determine your eligibility to provide or receive an AMP Life related product or service, and to manage our relationship with you including where relevant, providing you with a quote or managing insurance related and other services being provided by or to you,
- to administer and provide insurance services, including to manage your and our rights and obligations (and those of insured persons) in relation to insurance services, including dealing with you or an insured person in connection with an insurance proposal, policy, or claim,
- to recommend updates to insurance policies to ensure adequate coverage for services beneficial to you,
- to provide you with marketing communications and invitations and offers for products and services including products or services that third-party business partners believe may be of interest to you,
- to conduct business processing functions including providing personal information to our related entities, contractors, service providers or other third parties including those making referrals to us,
- to prepare internal reports for the purposes of improving our products, services, and internal operations,

- to provide improved services to you through our website, social media channels and to develop and improve the products and services we offer to you and/or to our customers,
- to provide you with advice relating to your needs, including insurance needs,
- to manage complaints and disputes, and report to dispute resolution bodies,
- to operate programs and forums in different media in which you are able to share information, including your personal information, with us and publicly,
- to manage, train and develop our employees and representatives,
- for a business or professional relationship we may have with you,
- if you apply for employment with us, to consider your application,
- to amend records to remove personal information; and
- for other everyday business purposes that involve use of personal information.

The above examples are a non-exhaustive overview only of how we may collect and use your personal information, and more detail may be provided to you in a separate privacy notice when you contact us.

We ensure that we have an appropriate legal basis to deal with your personal information in these ways, including:

- where you have provided your consent (such as when you provide your consent to receive marketing messages),
- where it is necessary for us to use your personal information in order to enter into or perform a contract (such as to send you a Product Disclosure Statement and Quotation in response to your product inquiry, or if we need to handle an insurance claim), or to protect your vital interests,
- where we have a legal or regulatory obligation that we must comply with or is in the substantial public interest (such as to prevent fraud or money laundering) or we need to use your personal information to establish, exercise or defend legal rights (such as debt recovery) or whenever courts are acting in their judicial capacity, and
- where we need to use your personal information for our legitimate business interests (such as managing our business operations, developing and improving the products and services we offer, company re-structure or selling part of our business), and when we do so, we will consider your rights and interests in accordance with applicable law.

We will only send you marketing communications if we have a legitimate interest as described above, such as if you have provided your explicit consent when signing up to our newsletters. If we use your personal information to contact you and you would prefer us not to, or if you indicate a preference for a method of communication, please let us know and we will respect your preference. You can do this at any time by contacting us directly by email or phone (see below for contact details).

## **Storing and disclosing your personal information**

Personal information is retained during the time we need it for the identified purposes, to the extent necessary for purposes reasonably related to those identified purposes (for example, resolving disputes) or as required by law. In using and storing your personal information, we may pass on your personal information including outside the country of collection:

- to other companies in the AMP Life Group, including those located in Australia, New Zealand, and Taiwan,
- to others, like the Trustee, our consultants, agents, contractors and service providers, auditors, or external advisers,
- to service providers and specialist advisers we engage to provide us with services such as infrastructure and software, administrative, financial, insurance or research services, some of whom may contact you on our behalf,

- to other insurers, reinsurers, licensees, insurance investigators and claims or insurance reference services, brokers, loss assessors, financiers, credit providers and credit bureau services,
- to any intermediaries, including your agent, adviser, broker, representative or person acting on your behalf,
- to your employer or group administrator, if you are a member of a workplace or association insurance plan, in order to administer that plan or where determined necessary or reasonable to do so, including in connection with any suspected unlawful activity associated with your insurance cover,
- courts, tribunals, and other dispute resolution bodies in the course of a dispute or litigation,
- where relevant, we may disclose information to a potential or actual third-party purchaser of our business or assets,
- anyone authorised by you or to whom you have provided your consent (either expressly or impliedly), including but not limited to other financial services providers that we may need to deal with on your behalf,
- anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information (for example, law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre, the Financial Markets Authority and the Reserve Bank of New Zealand),
- other financial services institutions in order to detect, investigate or prevent actual or potential financial crimes including fraud in connection with the products or services we provide to you, and
- in additional ways you may also agree to.

Some of the entities that we share information with may be located in, or have operations in, other countries. This means that your information might end up stored or accessed in overseas countries, including countries within the European Union, India, New Zealand, Taiwan, United Kingdom and United States.

When we pass on, transfer or share your personal information in this way, we take steps to ensure it is treated in the same way that we would treat it, and that an adequate level of protection is in place in accordance with relevant privacy and data protection laws.

We may also disclose personal information to any person authorised by you, or to others you have nominated in connection with an insurance policy you hold with us. When you acquire an insurance policy with us, you authorise us to share personal information with any co-insureds to confirm, for example, full disclosure has been made to us or to ensure that the policy owner is aware of the details of all benefits and services claimed on the policy.

We do our best to keep our records of your personal information up to date and accurate, and to delete or amend personal information that is no longer needed.

To comply with a legal or regulatory obligation, or to the extent that we have a legitimate purpose (such as to manage our business operations or to conduct data analytics to improve our services), we may also share with others and disclose information from which personal information has been removed (including aggregated, anonymous or pseudonymised information) so that no privacy is affected.

There may be times where we must pass on personal information for legal or safety reasons or other special circumstances, such as in order to comply with a legal or regulatory obligation that we have or to protect your vital interests.

## **Protecting your personal information**

We use various systems and services to safeguard the personal information we store, as part of our business systems and processes. We take steps to protect your personal information from misuse, interference or loss and unauthorised access, modification and disclosure with appropriate safeguards and security measures.

While we take steps to protect your personal information when you send it to us, you should keep in mind that no internet transmission is ever completely secure or errorfree. If you provide any personal information to us via our

online services (including email), or if we provide information to you by these means, the privacy, security and integrity of any data transfer over the internet cannot be guaranteed. When you share information with us (such as over the internet, or sending us an email), it is at your own risk as factors beyond our control include the security of the device and/or program you use to communicate with us, and steps you take to protect your login details and password. If you reasonably believe that there has been unauthorised use or disclosure of your personal information, please contact us directly (see below for contact details).

## Cookies

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our websites, including presenting web pages according to your needs or preferences.

We use cookies to give you access to certain pages of the websites without having to log in each time you visit. We may also use external service providers to track the traffic and usage on the website. You may not be able to access some parts of our websites if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

Our website may also contain links or references to other websites not subject to this Privacy Policy or our standards and procedures. You should check their own privacy policies before providing your personal information.

## Contacting us about privacy

You may wish to contact us to seek more information about anything contained in this policy or to request a printed copy of this policy, to access your personal information, to seek to correct it, opt out of receiving direct marketing material or make a privacy related complaint.

Our contact details are set out below.

### **Australia**

AMP Life Limited  
PO Box 300  
PARRAMATTA NSW 2124  
Australia  
Phone: 133 731  
Email: askamp@amp.com.au

### **New Zealand**

AMP Life Services (NZ) Limited  
PO Box 55  
Auckland 1140  
New Zealand  
Phone: 0800 808 267  
Email: service@amp.co.nz

We will respond to your request for access to personal information we hold about you within the timeframes required by applicable laws and/or as soon as we reasonably can, including notifying you if we are unable to provide access (such as when we no longer hold the information) or if we are permitted by applicable law to refuse access. Generally, we do not impose any charge for a request for access, but where permitted to do so by applicable law, we may charge you a reasonable fee for the retrieval costs associated with providing you with access.

We take privacy related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest, and fair in dealing with your concerns. We will establish in consultation with you a reasonable process, including time frames provided by applicable laws, for seeking to resolve your complaint.

If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can ask for your concerns to be escalated to the AMP Life Group Privacy Officer by email to [privacy@amplife.com.au](mailto:privacy@amplife.com.au) or write to the address listed above.

Alternatively, you can contact an external body:

### **In Australia**

— If your complaint is about how we handle your personal information you can contact the Office of the Australian Information Commissioner – call 1300 363 992 or find them online at [oaic.gov.au](http://oaic.gov.au).

— If your complaint is about the products and services we provide you can contact the Australian Financial Complaints Authority (AFCA) – call 1800 931 678, in writing to Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001 or online at [info@afca.org.au](mailto:info@afca.org.au).

There may be a time limit for referring your complaint to AFCA. You should contact them or visit their website for more details.

### **In New Zealand**

The Office of the Privacy Commissioner (<http://www.privacy.org.nz>) provides further details of the New Zealand Privacy Act and how it protects personal information in New Zealand and how you can make a complaint..