# Privacy Policy

## Purpose of this Policy

We are committed to protecting your personal information and complying with all applicable privacy and data protection laws, including the *Privacy Act 1988 (Cth)* in Australia and the *Privacy Act 2020* and *Health Information Privacy Code 2020* in New Zealand. This Policy sets out the minimum standards for how we deal with personal information collected, used, stored, and disclosed by Resolution Life Australasia.

This policy is issued for Resolution Life Australasia. "Resolution Life Australasia", "we", "our", "us" in this policy means Resolution Life Australasia Limited ABN 84 079 300 379, NZ Company No. 281363, AFSL No. 233671 and all its related bodies corporate in the Acenda Group* of companies in Australia and New Zealand, except the following which have their own privacy policies/statements:

- Nippon Life Australia and New Zealand NOHC Pty Ltd (NOHC) – see https://www.acenda.com.au/acenda-group, for the NOHC's Privacy Statement.
- Nippon Life Insurance Australia and New Zealand Limited – see https://www.acenda.com.au/about-us/privacy-policy.
- Asteron Life Limited (in New Zealand) – see https://www.asteronlife.co.nz/privacy-policy.

Your information may be disclosed to these entities in accordance with the purposes set out in this Privacy Policy. How each of these entities collects, uses and discloses your personal information is set out in their own individual policies/statement, available at the website links above.

Our overall approach for complying with applicable privacy requirements includes:

- We respect and maintain our customers' privacy.
- We embrace Privacy by Design. We do this by building privacy protections into our products and services from the outset.
- Complying with all relevant privacy and data protection requirements and obligations.
- Complying with our approach to the management of personal information, as explained in this document.
- Ensuring appropriate resources are allocated to privacy, including technology systems and services, and our overall framework.
- Training our employees.

When we request personal information from you or an authorised third-party, we will explain the purpose for collecting it, how it will be used and whom we may share it with. At all times we will comply with the terms of this Policy when handling your personal information.

* "**Acenda Group**" means Nippon Life Australia and New Zealand NOHC Pty Ltd and all of related bodies corporate in Australia and New Zealand.

## Contents


Purpose of this Policy ..... 1
Collecting Your Personal Information ..... 2
What happens if you do not give us consent to collect your personal information? ..... 3
Using your Personal information ..... 3
Storing and disclosing your personal information ..... 4
Protecting your personal information ..... 6
Privacy and the internet ..... 6
Website and other data tracking ..... 6
Links to external sites ..... 7
Your right to access and/or request correction of your personal information ..... 7
Contacting us regarding this Policy or to make a complaint ..... 7
Updating our Privacy Policy ..... 8


## Collecting Your Personal Information

Resolution Life Australasia will ensure that the collection of any personal information is lawful, fair and not unreasonably intrusive. We will only collect your personal information directly from you unless we obtain your prior consent to collect it from an authorised third party or when we are permitted to do so under relevant privacy laws.

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

- Employers,
- When a new employee joins an employer's superannuation or insurance plan,
- Parents or guardians in respect of children,
- People authorised by you such as lawyers or accountants,
- Medical, health or other treatment or rehabilitation providers,
- 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,
- Financial advisers, and third-party brokers such as insurance and mortgage brokers,
- AML/CFT compliance and electronic identity verification service providers[1],
- Credit reporting bodies, and
- Agencies such as the Australian Taxation Office or New Zealand Inland Revenue Department.

Collection of your personal information will be limited to what is necessary in the circumstances to provide you with relevant financial products and services, including wellbeing and recovery programs and services made available by us or other members of the Acenda Group, assist you with any questions or complaints, our internal operations such as record keeping, data analytics, auditing, 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, who we intend to share it with, and how we will protect it.

Personal information is collected, for example, through application forms or other forms that you complete and submit to us (in writing and digitally) or by recording the information you provide via phone calls and interviews. For employment candidates, we collect your personal information including employment history and other information during the recruitment

[1] In order to comply with our AML/CFT obligations, Resolution Life engages the services of Zencos Consulting LLC (www.zencos.com), and, with your prior consent for identity verification, Cloudcheck/GreenID (each operated by GB Group plc at www.gbg.com).

process either directly from you or from recruiters.

The types of personal information we collect will depend on your relationship with us, such as whether you are a 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 including tax file numbers, health and/or wellness information, employment details, domicile, and citizenship status.

We may also, in appropriate cases and to the extent permitted by law, control, process and use certain sensitive personal information (e.g., when undertaking 'Know Your Customer' or Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) checks, we may collect information about any offences that you or your employees, directors, officers or representatives have committed). Resolution Life Australasia will only use biometric technology to collect biometric information with your prior informed consent and will only do so for the limited purpose of verifying your identity[1].

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.

[1]Biometric technology involves the storage and use of biometric information for our business and related purposes that may include recognising or verifying the claimed identity of an individual. Biometric information is the unique biological, physiological, or behavioural characteristics of an individual that may include analysis of people's faces, eyes (iris or retina), fingerprints, voices, signatures, keystroke patterns, odours, or even the way they walk. Biometric information is considered sensitive personal information and is regulated by the privacy and data protection laws.

## What happens if you do not give us consent to collect your personal information?

If you do not provide us with consent to our reasonable requests for your personal information necessary for the purpose for which it is being sought, we may no longer be able to provide our services to you, such as to assess your application for insurance cover, assessment of your claim or consideration of your application for employment.

## 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 (including electronic identity verification), respond to and process your requests for information and provide you with a product or service,
- To determine your eligibility to provide or receive our related products or services, 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. We may use AI technologies to enhance our services and provide a better user experience. Our AI systems may process personal data to personalise content, improve customer support, and analyse user behaviour. We ensure that all data processed by AI is handled securely and in compliance with applicable data privacy laws.
- 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 administer, provide, support and improve wellbeing and recovery services through Vivo, the Acenda Group's holistic health, wellness and recovery program,
- To recommend updates to insurance policies to ensure adequate coverage of 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 and for our governance arrangements including providing personal information to our related bodies corporate, 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 manage complaints and disputes (including any whistleblowing reports), 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 a job with us, to consider your employment 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.

We may also use automated processes to assess online applications for insurance. In doing so, your personal and sensitive information, including health information, medical reports and test results (where applicable) may be processed to determine whether an application can be accepted automatically, should be referred for further assessment, or whether insurance may be offered subject to particular terms, conditions or pricing.

More detail may be provided to you in a separate privacy collection notice when you contact us or upon request.

We ensure that we have an appropriate lawful purpose 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),
- 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,
- We have a legal or regulatory obligation that we must comply with or is in 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
- 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 express consent when signing up to our newsletters. If you no longer wish to receive any marketing communications from us, 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

We do our best to keep our records of your personal information up to date and accurate.

Resolution Life Australasia will only disclose your personal information to a third party, if permitted by applicable privacy and data protection laws, or if required by law. For example, Resolution Life Australasia may share your personal information with the following parties:

- To other related bodies corporate in the Acenda Group for reasonable business purposes, including those located in Australia, New Zealand, Japan, United States of America, Bermuda, and Taiwan,
- To our consultants, agents, contractors and service providers, auditors, or external advisers,
- To service providers[2] and specialist advisers we engage to provide us with services such as infrastructure and software, administrative, financial, wellbeing and recovery, insurance or research services, some of whom may contact you on our behalf,
- To our retail and group insurance product reinsurers[3],
- To other insurers, licensees, insurance investigators and claims or insurance reference services, brokers, loss

[2] Our administration and customer service providers are TATA Consultancy Services Limited (www.tcs.com) and Genpact Limited (www.genpact.com). We also engage a third-party group insurance policy administrator, AGI Group Insurances Pty Limited (www.agigroup.com.au), in relation to certain group insurance products.

[3] Swiss Re Life & Health Australia Limited, New Zealand Branch (Privacy Policy | Swiss Re); General Reinsurance Life Australia Limited (www.genre.com); Munich Reinsurance Company of Australasia Limited (www.munichre.com); and RGA Reinsurance Company of Australia Limited (www.rgare.com). Our reinsurers may indirectly collect your Personal Information. Where Personal Information is provided to them, they will collect and use it in accordance with their privacy policies, which also permit disclosure to certain third parties. Your rights to access and correct your Personal Information held by our reinsurers are also set out in their respective privacy policies. Further information about our reinsurers, including copies of their privacy policies, is available on their websites.

assessors, financiers, credit providers and credit bureau services,

- To any intermediaries, including your agent, adviser, broker,
- 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,
- To courts, tribunals, and other dispute resolution bodies in the course of a dispute or litigation,
- To comply with requests made by Regulators, Government Agencies or Statutory Authorities,
- Where relevant, we may disclose information to a potential or actual third-party purchaser of our business or assets,
- To anyone authorised representative or person acting on your behalf 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,
- To 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 New Zealand Inland Revenue Department, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre, the New Zealand Financial Markets Authority, and the Reserve Bank of New Zealand),
- To 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 any other ways you may also agree and consent to.

Personal information including health information may also be held and stored by our business partners, service providers and other third parties such as superannuation trustees and reinsurers, and will be done so in accordance with their individual privacy policies.

In using and storing your personal information, we may disclose your personal information to others including outside the country of collection for reasons related to the primary purpose for which it was collected. Secondly, 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, Japan, Philippines, New Zealand, Taiwan, United Kingdom, Bermuda and the United States of America.

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.

To comply with a legal and 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.

We may also use third party providers to perform services for us, on your behalf, or to manage some of our processes and services. To enable those services and processes to be performed, we may need to provide those third parties with your personal information. We may also engage, or be engaged by, third parties including government agencies, in circumstances which require us to provide your personal information to them, or to another party, to meet our contractual, legal or regulatory obligations. You authorise us to disclose your personal information to those third parties where needed or required for those purposes.

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

## Vivo Wellbeing and Recovery Services

Resolution Life Australasia customers may be offered access to Vivo, the Acenda Group's holistic health, wellness and recovery program. The brand offers a holistic approach that combines expert services, personalised advice, and specialist care for both physical and mental wellbeing.

Where you choose to participate in Vivo, personal information may be collected, used and disclosed for the purpose of administering, providing, supporting and improving Vivo and related wellbeing and recovery services. Additional information regarding Vivo and the handling of personal information in connection with Vivo can be accessed on Vivo's

website – see https://www.vivowellbeing.com.au/.

## Protecting your personal information

We use various systems and services and apply privacy principles to safeguard and protect all personal information we collect, use, store and disclose. This includes taking reasonable steps to protect your personal information from misuse, interference or loss and unauthorised access, modification, and disclosure.

While we take all reasonable 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 error free. 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).

For the purpose of satisfying any legal, accounting, or reporting requirements we may retain Personal Information for a period of 7 years in accordance with our Record Retention Policy, or until it is no longer necessary to retain the information for the purposes it was collected for. In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

You may request the deletion of your personal information from our records which we will reasonably consider.

## Privacy and the internet

When you visit our websites including https://resolutionlife.com.au and https://resolutionlife.co.nz we may collect information from you about your visit to our site to assist us to measure and improve our website. Each time you visit our websites, we may collect information about your visit which may include the following:

- The date and time of visits,
- The pages viewed and your browsing behaviour,
- How you navigate through the site and interact with pages (including fields completed in forms and applications completed),
- General location information, and
- Information about the device used to visit our website (including your tablet or mobile device) such as device IDs.

Our Chatbot services available on our website are not anonymous. Information that you enter when interacting with our Chatbot will be monitored and recorded and may be used to help us improve our Chatbot functionality. Any Personal Information provided during your interaction with our Chatbot will be stored, used, and handled in accordance with this Privacy Policy. However, we recommend that you do not share sensitive personal information with our bots such as credit card or bank account details.

## Website and other data tracking

We use website analytics measurement software to collect visitor information when you use our websites, mobile or tablet applications so that we can better understand how to improve our products and services for you. One of the primary methods used by this tool is the placement of cookies.

Cookies are small information files that an end user's web browser places on their computer or in memory when a website is visited. Cookies help us determine the type of browser and settings you are using, where you have been on the websites, 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 more relevant and effective experience on our websites, including presenting web pages according to your needs or preferences. Cookies also give you access to certain pages of the websites without having to log in each time you visit.

For information on disabling these cookies, please go to the privacy settings section within your browser. If you choose to disable cookie acceptance in your browser, you may not be able to access some parts of our websites, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

We also use other external companies for the following purposes:

- For web hosting services for this website,
- To gather non-personal information (using cookies) in order to evaluate the website's effectiveness, for example online marketing activities, and
- To track the traffic and usage on the website.

### Links to external sites

Our website may also contain links or references to other websites that we consider contain content relevant to the information that you were seeking from us. Any links to external websites are not subject to this Privacy Policy or our standards and procedures. You should check their own privacy policies before providing your personal information.

## Your right to access and/or request correction of your personal information

You may request confirmation of whether we hold any of your personal information, and if so, request access to or a copy of that information. You may also request that your personal information be corrected if you think it is wrong, incomplete or out of date.

Resolution Life Australasia will disclose your requested personal information to you where it can be readily retrieved, unless there is good reason (in accordance with any applicable privacy laws) for not doing so, including where such disclosure would breach someone else's rights to privacy and/or the law.

If so, please contact us on the details set out below.

**Australia**

Resolution Life Australasia Limited
GPO Box 5441
Sydney NSW 2001
Australia
Phone: 133 731
Email: askus@resolutionlife.com.au

**New Zealand**

Resolution Life Australasia Limited
PO Box 1692
Wellington 6140
New Zealand
Phone: 0800 808 267
Email: resolutionlifeprivacy@resolutionlife.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.

## Contacting us regarding this Policy or to make a complaint

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

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 Australian Resolution Life Privacy Officer by email to privacy@resolutionlife.com.au or to the New Zealand Resolution Life Privacy Officer by email to resolutionlifeprivacy@resolutionlife.co.nz or write to the respective address listed above.

Alternatively, you can contact the following external bodies:

**In Australia**
If your complaint is about how we handle your personal information you can contact the Office of the Australian Information Commissioner on 1300 363 992 or find them online at www.oaic.gov.au.

- If your complaint is about the products and services we provide, you can contact the Australian Financial Complaints Authority (AFCA) on 1800 931 678, in writing to Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC

3001 or by email at 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**
If you remain dissatisfied with our response, you have a right to refer your complaint to the Office of the Privacy Commissioner. You can contact the Office of the Privacy Commissioner on 0800 803 909 or find them online at www.privacy.org.nz.

The Office of the Privacy Commissioner also provides further information regarding your rights under the New Zealand Privacy Act.

## Updating our Privacy Policy

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 and any future information collected and this Policy 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 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.

Our Privacy Officers will ensure the Privacy Policy is reviewed annually or more frequently when required.