

## **PRIVACY POLICY**

### **Purpose**

Corporate Services Network ("CSN") Privacy Policy explains how CSN manages personal and sensitive information we have about our clients and how we are committed to complying with the requirements of the Privacy Act (1988). This act incorporates Australian Privacy Principles and we will ensure that all personal information held by CSN will be treated in accordance with those principles.

This policy has been developed by senior management and approved by the Managing Director.

It will be reviewed from time-to-time to take account of new laws and technology, changes to our operations and practices and to ensure it reflects the changing environment. Any information we hold will be governed by the most current CSN Privacy Policy.

### **Collection of Personal Information**

At CSN, we collect personal and sensitive information that is necessary to manage a claim or service, which relates specifically to our business function and we will collect this information by fair and lawful means. For example, if we are managing an insurance claim, we will only collect personal and sensitive information to the extent necessary for us to complete the claim transaction. This will include health information related to your claim and personal details such as your address, date of birth, contact details and information relevant to particular insurance policies. This information is usually obtained from your claim application or from third parties such as doctors, hospitals or employers. The latter would be obtained with your consent and would be necessary in order to process the claim or service required.

Any unsolicited information we may receive about you will be destroyed or de-identified as soon as practicable.

### **Management of Personal Information**

We only use and disclose your personal information for the primary purpose for which it was collected. For example, to evaluate or deliver our services to you, we may need to disclose your information to:

- an agent authorised by CSN to collect or assess information relating to the relevant service;
- a broker or other persons authorised by you;
- the insurer or a reinsurer of the relevant product or service;
- a person or organisation contracted by CSN to assess, evaluate or manage claims made under your policy;
- a person or organisation contacted by CSN to confirm, assess, clarify or assist in delivering a product or service to you;
- an organisation contacting CSN, with your consent, to obtain past policy or claims information about you;

We limit the use and disclosure of any personal information provided by us to third parties to the specific purpose for which we supplied it.

There are exceptions (secondary use) which may include:

- you consented to a secondary use or disclosure;
- you would reasonably expect the secondary use or disclosure, and that is related to the primary purpose of collection or, in the case of sensitive information, directly related to the primary purpose;

- the secondary use or disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order;
- a permitted general situation exists in relation to the secondary use or disclosure of the information by the APP entity;
- the APP entity is an organisation and a permitted health situation exists in relation to the secondary use or disclosure of the information by the organisation;
- the APP entity reasonably believes that the secondary use or disclosure is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

CSN trains its employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals. CSN regards breaches of your privacy very seriously and may take disciplinary action against any staff that breaches this policy.

CSN has a Privacy Manager to ensure that management of personal information is in accordance with our policy and the Privacy Act.

### **Anonymity**

The nature of our business does not lend itself to treating customers with anonymity. All services require personal information about the individual for whom the service is being provided.

### **Disclosure outside Australia**

When necessary we may disclose your personal information overseas to a third party if they are an essential service or claims provider within our business process. This information will only relate to the primary purpose for which it was collected.

Countries in which the other parties are located are typically dependent upon where your claim or service may originate or where the insurance is underwritten. We also have business arrangements with companies located in Singapore, UK, USA, Denmark, Thailand and New Zealand.

The types of overseas companies we disclose information to are insurance brokers, insurers or emergency assist providers. These are companies who would only have an interest in your claim or service that CSN is providing to you.

CSN will not disclose your personal information overseas unless:

- CSN has advised you to which country/s the information will be disclosed.
- CSN has your consent to do so.
- The receiving party provides commitments to privacy principles and confidentiality which we have reasonable belief are at least equal to the Australian Privacy Principles. If this commitment cannot be made we will inform you and seek your consent to disclose the information.

### **Use of Government Related Identifiers**

We will not use government identifiers (eg your Medicare number) as our own identifier for you. We will only use or disclose such identifiers as permitted under relevant privacy legislation.

### **Information Security**

CSN will take all reasonable steps to ensure that personal information held by CSN is secure from any misuse, interference, loss, unauthorised access, modification or disclosure.

Our computer systems are protected to prevent unauthorised access to information. Only those staff who have relevant authority may gain access to this information.

Our systems have security firewalls, which prevent access by people external to our business. We have taken reasonable steps to secure communications through our systems and website.

Our offices have adequate security procedures in place for the protection of documents and information held by us.

CSN has written policies with respect to data retention, retrieval and deletion. These policies are compliant in every case with the Australian Privacy Principles. The company will take all reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the purposes for which CSN is authorised to use it.

### **Accessing and Correcting your Personal Information**

On your written request, CSN will provide you with access to the personal information that we hold about you, except in circumstances where access may be refused. In those circumstances you will be provided a written response including the reasons for the refusal except to the extent that it would be unreasonable to do so and the mechanisms available to complain about the refusal.

CSN will take reasonable steps to keep the personal information that we hold about you is accurate and up to date. This is particularly important when we collect and use/ disclose your information.

If you believe that any information we hold about you is incorrect, irrelevant or out of date you should notify us so that we can correct it. If CSN refuses to correct the personal information given by you, we will provide a written response including the reasons to the extent that it would be unreasonable to do so and the mechanisms available to complain about the refusal.

### **Privacy Enquiries or Complaints**

CSN has privacy enquiries and complaints handling procedure to deal with any inquiry or complaint you may have about how we have collected, used or managed your personal information. If you would like to make an enquiry or complaint, please complete the "Privacy Complaint or Query" form that is available on our website at [www.csnet.com.au](http://www.csnet.com.au)

The form is located by selecting the tab at the bottom of the homepage. On completion please send to our Privacy Manager, Corporate Services Network, GPO BOX 4276 , Sydney 2001 or email: [privacy@csnet.com.au](mailto:privacy@csnet.com.au)

Your enquiry or complaint will be taken seriously and investigated thoroughly. We will respond to your enquiry or deal with any complaint within 10 days. If you are not satisfied with the response provided or you don't receive a response you can lodge a complaint with the Australian Information Commissioner which may be able to investigate the matter.