



HEALTHIER, LONGER,
BETTER LIVES

AIA Australia Group

PRIVACY POLICY

Incorporating

- AIA Australia Limited
- AIA Financial Services Limited
- The Colonial Mutual Life Assurance Society Limited
- CMLA Services Pty Ltd
- Jacques Martin Pty Ltd
- Jacques Martin Administration and Consulting Pty Ltd

AIA Australia Group Privacy Policy

This is the privacy policy for AIA Australia Limited (ABN 79 004 837 861 AFSL 230043) (AIAA), AIA Financial Services Limited (ABN 68 008 540 252 AFSL 231109) and their related bodies corporate.

In addition AIAA has entered into a joint cooperation arrangement with Commonwealth Bank of Australia (ABN 48 123 123 124) (CBA) and The Colonial Mutual Life Assurance Society Limited ABN 12 004 021 809 AFSL 235035 (CMLA), for the joint operation of the businesses of CMLA, AIAA. This privacy policy also covers CMLA, CMLA Services Pty Ltd ABN 88 622 557 251 (CMLA Services), Jacques Martin Pty Ltd ABN 55 006 100 830 and Jacques Martin Administration and Consulting Pty Ltd ABN 24 006 787 748.

All of the above companies (excluding CBA) are collectively referred to throughout this policy as “**the AIA Australia Group**”, “**We**”, “**us**” and “**our**”:

We provide a range of life insurance, superannuation, investments and savings related products and services, including eligible private health insurance through MO Health Pty Ltd ABN 32 611 323 034, (a registered private health insurer and referred to throughout this policy as myOwn health insurance – to learn more go to myown.com.au), and health and wellness membership programs through AIA Vitality (to learn more about AIA Vitality go to aia vitality.com.au). **We** will refer to these collectively as **our** Products and Services throughout this policy.

Your Personal Information (including sensitive information), is collected and handled in accordance with this Privacy Policy and **our** specific legal obligations under the Australian Privacy Principles, found in the *Privacy Act 1988* (Cth).

This includes:

- **Our** customers, and members (including potential and former customers and members)
- Visitors to **our** websites and social media pages
- **Our** distribution partners
- Advisers, and the Australian Financial Service Licensee they represent, and
- Job applicants, staff, officers and contractors.

If the Financial Services Council Life Insurance Code of Practice (“Code”) applies to the insurance cover **we** provide you, **we** will also comply with the Code when **we** collect, use and disclose your Personal Information.

Our Privacy Policy outlines how **we** collect, hold, store, use, handle, protect and disclose your Personal Information, including sensitive information.

We understand that your privacy is important and **we** value your trust in **us**.

We take privacy seriously and are committed to protecting and respecting your personal and sensitive information.

We will not sell your information to others in Australia or overseas.

By accessing and/or using **our** websites, **our** staff intranet sites, and other websites, webpages, portals, social media pages or smart phone/tablet applications where this Privacy Policy is referred to or is made available from, as well as facilities, online applications, tools or utilities offered (collectively referred to throughout this policy as **our** websites), you are:

- confirming that you have reviewed the latest version of **our** Privacy Policy on **our** websites before providing Personal Information to **us**, and
- consenting to the collection, use, handling and disclosure of your Personal Information as set out in **our** Privacy Policy as updated from time to time, and
- agreeing to the [Terms of Use](#).

Information we collect

We collect information, including your personal and sensitive information (Personal Information), from you (or from your authorised representatives), when you contact **us**, enquire about, apply for, hold, change, use, transact, interact or make a claim under any of **our** Products and Services.

Sensitive information

The Privacy Act protects your sensitive information. For example, this includes information about your religion, ethnicity, health or biometrics such as your fingerprints. If **we** need this type of information, **we** will ask for your permission or consent, except where otherwise allowed by law.

This includes when you visit **our** websites, use **our** online and mobile apps, and information collected from social and networking services such as Facebook and Twitter, when **we** communicate and engage with you by phone, SMS, email, digital or post, or when you apply for a job with **us**, enter into a contract with **us** and deal with us in other ways.

We also collect and exchange information about you from third parties, including:

- **Our** distribution partners
- Advisers
- Superannuation trustees and their administrators
- Policy owners (where you are a life insured who is not the policy owner)

- Employers, including past employers
- **Our** service providers and third parties
- AIA Vitality partners and their service providers
- Insurers (including worker's compensation insurers, authorities, private health insurers – such as MO Health Pty Ltd) and their contractors, services providers, agents and related bodies corporate
- Reinsurers
- Medical and health professionals, and medical and health service providers
- Financial institutions, accountants you nominate
- Credit reporting bodies and credit providers
- AIA Vitality Company Limited (incorporated in Hong Kong) and Discovery Holdings Limited (incorporated in South Africa)
- The issuer of any product, including **our** Products and Services to which your AIA Vitality membership is linked and the and third parties service providers of these entities
- Regulators of **our** Products and Services, health insurance commission and their agents, and
- From others if you have given us consent to, or authorised us to, obtain that information from another person, business, organisation or entity, or as otherwise is permitted by law.

We also take steps to verify information collected and to confirm whether information is up to date.

Where you provide **us** with Personal Information about someone else you must have their consent to provide their Personal Information to **us** in accordance with this Privacy Policy.

The information **we** collect may include:

- Your name and address – including your postal and residential address
- Your contact details – including telephone, mobile and email
- Your date of birth and gender
- Information to verify your identify – for example your passport, birth certificate, drivers licence, and Medicare details
- Health and medical information for your insurance, including myOwn private health insurance
- Health, medical, physical activity, lifestyle and wellbeing assessments for your AIA Vitality membership
- Superannuation and membership information
- Your Tax File number
- Financial and transactional information – including income, payment and banking information, bank account, debit/credit card details
- Information relating to your credit information and reports for the purpose of checking your credit history, to assess your ability to manage credit, assess applications for credit, and exchanging information with credit agencies in

relation to your credit history with **us**, or to collect overdue payments or other monies owing to **us**

- Family and beneficiary information
- Insurance claims information
- Recording of your communications and interactions with **us** (including telephone, email or online), for security, investigative, record (including in relation to claims), dispute resolution, quality assurance, training and other purposes
- Recordings from CCTV camera, video and audio surveillance devices in or outside **our** premises
- Work, occupation and pastimes
- Information contained in your social media profiles
- Your location information, IP address, cookies and information about third party sites you access, and
- Other details and information of your interactions with **us**.

We are required or authorised to collect your Personal Information under various laws including:

- *Life Insurance Act*
- *Insurance Contracts Act*
- *Corporations Act*
- Taxation legislation (including without limitation the *Income Tax Assessment Acts and the Taxation Administration Act*)
- *Superannuation Guarantee (Administration) Act*
- *Superannuation Industry (Supervision) Act*
- *Retirement Savings Account Act*
- *Financial Sector (Collection of Data) Act 2001*
- *Anti-Money Laundering and Counter-Terrorism Financing Act*
- *Financial Transaction Reports Act*
- *Foreign Account Tax Compliance Act (FATCA)*
- *Tax Common Reporting Standard (CRS)*
- *Crimes Act (Vic), Crimes Act (NSW), Criminal Law Consolidation Act (SA)* and the Criminal Codes of Queensland, Tasmania, WA, NT, ACT and the Commonwealth
- Other related regulations and legislative instruments.

How we use and disclose your information

We use, share, exchange, disclose and store your information, including Personal Information to provide, manage and administer **our** Products and Services. **We** also use, share and exchange it to aggregate and link information across **our** Products and Services and dealings that you have with **us** so **we** can form a single view of your customer/member profile.

We use and disclose your information for the following purposes:

- To manage **our** relationship with you

- To process and respond to your applications, instructions and requests
- To assess applications and underwriting
- To assess and process claims
- For reinsurance purposes
- To communicate with you or respond to feedback, enquiries, and manage complaints and disputes
- To manage and administer any eligible discounts, cashbacks and rewards you may be entitled to across eligible Products and Services you have with **us**
- To identify and understand what Products and Services you have with **us**
- To gather and aggregate information for statistical, prudential, actuarial and research purposes, including market research and data matching
- To communicate and engage with you about **our** Products and Services that may be of interest to you
- To conduct marketing, competitions, promotional activities, and customer satisfaction surveys
- To meet requirements imposed by law
- To manage and administer **our** relationship with you
- To correct or respond to comments or statements made in the media in relation to **us** and **our** partners
- For purposes relating to any actual or potential mergers, joint ventures and acquisitions
- To investigate, manage and prevent actual, potential or suspected improper conduct such as fraud or other illegal activities
- For verifying your identity, including your authority to act on behalf of a customer
- For training, developing and testing products, services and systems
- For statistical, prudential, research, audit, actuarial and reporting purposes
- To monitor and protect **our** brands, and
- To manage **our** business.

CBA

We have distribution, administration and other services agreements with CBA as they provide services to support the distribution and administration of **our** Products and Services. Accordingly **we** will disclose and exchange your Personal Information with CBA to help distribute **our** Products and Services or to enable it to provide services to **us**.

In some instances **we** will exchange information with CBA to help improve or develop new Products and Services, or to respond to queries or complaints about **us** or **our** Products and Services. **We** may also share information for identity verification and foreign tax compliance reporting in respect of

which **we** and CBA have agreed to act on each other's behalf. This allows **us** to both use the same customer information for these purposes without needing to each ask for the information separately. The information shared may include, for example, names, contact details, date of birth, product details and identity numbers such as foreign tax identification or driver's licence numbers.

In some cases **we** may rely on CBA to provide services in connection with **our** Products and Services and some personal information and data may be visible on CBA systems. To learn more about CBA's Privacy Policy, go to commbank.com.au and click on Privacy at the bottom of the homepage. This personal information does not include sensitive personal information. These CBA systems are subject to the CBA Group Privacy policy and strict information security obligations agreed between CBA and the relevant AIAA Group members.

Other uses and disclosure of information

We may also use, disclose and exchange your information for other purposes where the law allows or requires **us**.

Where you are a life insured who is not the policy owner, **we** may also at times provide and exchange Personal Information about you to the policy owner of the eligible insurance policy under which you are insured or provide and exchange Personal Information about the policy owner of the eligible insurance policy to you, the life insured. **We** may at times permit your Representatives to provide, access, receive, review and update the Personal Information about you in respect of your insurance or AIA Vitality membership with **us** over email, by phone or online.

Where you accept **our** Privacy Policy or where **we** are otherwise permitted by law, **we** and **our** partners and service providers may use your Personal Information (including your telephone number, even if it is listed on the Do Not Call Register, and your email or other electronic addresses) to provide marketing communications that may be of interest to you, including about insurance and financial products and services, programs or events, health and wellness products and services and, if you are a member of AIA Vitality, products and services of **our** AIA Vitality partners in accordance with the procedures described under the heading "Collection and disclosure – AIA Vitality Partners" below.

Communications may be provided on an ongoing basis by telephone, electronic messages (e.g. email and pop-ups), online (including via website, social media and mobile apps) and other means. **We** may imply your consent to receive these communications from our existing business relationship or in some circumstances where you or your Representatives have provided us with your contact details (including telephone, email or other electronic address).

What to do if you do not wish to provide information or receive marketing communications

If you are unwilling to provide **us** with the information **we** need then **we** may not be able to do the things described in this Privacy Policy. For example, **we** may not be able to provide you with insurance cover, to provide, administer or manage **our** Products and Services you have with **us**, or to hire you.

If you do not wish to receive direct marketing communications please indicate this where prompted (e.g. in an application form or by following unsubscribe instructions in the communications themselves) or by contacting **us** as set out below. Please note that if you have not told **us** that you do not wish to receive these communications by phone, where permitted by law, you may be contacted even if you have registered your phone number on the national Do Not Call Register.

Who may have access to your personal information

The parties with whom **we** exchange your Personal Information varies depending on **our** Product and Services, stage in a policy application, underwriting, or claims process as relevant to your circumstances. Depending on the circumstances specific to your policy or product, **we** may exchange your personal information with:

- **Our** intermediaries
- **Our** partners (including but not limited to entities with which AIAA has partnered in relation to the AIA Vitality program in accordance with the procedures described under the heading “Collection and Disclosure – AIA Vitality Partners” below and partners used in co-branded activities or business initiatives such as CBA)
- Accountants and financial institutions you nominate
- Reinsurers, where **we** reinsure any insurance cover **we** provide or offer or propose to provide to you
- Other insurers (including worker’s compensation insurers, authorities, private health insurers including MO Health Pty Ltd) and their contractors and agents
- Any employee, agent, service provider, contractor or third party who provides administrative or other services to AIAA or any partners space (those services may include health: insurance and reinsurance; archival; auditing; accounting; customer contact; call centres; legal, business consulting, banking, payment, delivery, data processing, data analysis, information broking, research, investigative, website or technology services; professional advisors; program administrators and partners; statement producers; mail houses; email and print services; advertising agencies;

technology, data and email storage and servers; backup and cloud computing providers, and other service providers as may be deemed necessary by AIAA from time to time)

- Publicly available sources, social media and other blogs, other websites you may visit and virtual communities and networks where people create, share or exchange information
- Your representatives in respect of your holdings with **us** (for example, insurance, investments or superannuation) or AIA Vitality membership. **We** may at times permit your Representatives to provide, access, receive, review and update the Personal Information about you in respect of your application, transaction request, claim, insurance or AIA Vitality membership with **us** over email, by phone or online
- The trustee or administrator of a superannuation fund and/or your employer
- Health professionals, medical providers and hospitals, dietitians, pharmacists, fitness trainers and rehabilitation providers
- The policy owner (where you are a life insured who is not the policy owner) and the life insured (where you are the policy owner who is not the life insured)
- Any other party with which **we** have an arrangement for the promotion and sale of products offered or distributed by **us**
- Bodies that administer applicable industry codes
- Credit reporting bodies and credit providers, and
- Other third parties from time to time with your implied or express consent or as required or authorised by law (and **we** may take steps separate to this Privacy Policy to ensure you are aware of these).

Sending or accessing your information to or from overseas countries

In most cases, your Personal Information is held in Australia. In some cases **we**, or third parties, use services such as data cloud storage systems and other administrative support services to facilitate international funds transfers where personal information is held, or is accessible from, recipients in other countries. When this occurs **we** take steps to ensure that your personal information is protected against unauthorised access and loss. As at November 2019, your personal information and data is likely to be shared or accessible by recipients in Malaysia, Philippines, Singapore, Hong Kong, China, South Africa, India, the United States and other countries in which **we** operate. You can find more information about this on the [AIA Australia privacy page](#). Head to the FAQs section and see “Is my personal information sent overseas?”. The [list of countries the CBA sends information to](#) is also available on the CBA website.

The Australian Privacy Principle 8.1 applies to disclosing personal information to overseas recipients. **We** are also subject to a range of other legal and regulatory obligations

which may require **us** to impose contractual privacy controls on overseas parties handling Personal Information on **our** behalf.

Use and disclosure with third parties

Where **we** provide your Personal Information to a third party, including a reinsurer, another insurer, another product provider, a Representative (such as a trustee or administrator of a superannuation fund and/or your employer), AIA Vitality Company Limited, Discovery Holdings Limited and AIA Vitality partners and providers for the purposes of the AIA Vitality program in accordance with the procedures described under the heading “Collection and Disclosure – AIA Vitality Partners” below, the third party may collect, use and disclose your Personal Information in accordance with their own privacy policy and procedures and terms of use. A third party’s privacy policy and procedures and terms of use, the legal protections afforded to you by them, and the third party’s ability to collect, use and disclose your Personal Information, may be different to that set out in this document and, if the third party is located outside Australia, are likely to be governed by the laws of a jurisdiction other than Australia.

We recommend that you carefully read and familiarise yourself with the privacy policy and procedures and terms of use of any third party with whom **we** are required to share your Personal Information. You can access the privacy policy of Discovery Holdings Limited at discovery.co.za/corporate/terms-and-conditions.

You should contact other third parties directly for copies of their privacy policies. If you would like information about **our** providers or other third parties applicable to your circumstances, please contact **us** as set out under Contact Us below.

Please also see below for information about how **we** keep your Personal Information secure.

In addition to the above, **we** may also collect, use and disclose your Personal Information in specific circumstances applicable to your situation as described below.

AIA Vitality members (including former and potential AIA Vitality members)

Specifically for AIA Vitality members, **we** collect, use and disclose your Personal Information including:

- Assessing and/or processing your AIA Vitality membership application, registration and activation
- Communicating with you, your Representative and/or the policy owner of your policy regarding your AIA Vitality membership (including without limitation by disclosing Personal Information such as lifestyle, health and medical information that relates to your AIA Vitality membership and other information such as your AIA Vitality Status,

membership number, whether you have completed certain activities, tests and/or assessments of the AIA Vitality program, whether you have purchased and/or used certain devices and/or accessories, your engagement in the AIA Vitality program or whether you have visited or used certain AIA Vitality partners to earn AIA Vitality points)

- Administration of your AIA Vitality membership, provision of health and wellbeing activities, tests and assessments (including to assess results against previous activities, tests and assessments) and benefits including discounts, cashbacks, rewards and payments relevant to your AIA Vitality membership
- Assessing your entitlement to any discounts available to you under insurance products linked to your AIA Vitality membership, and
- Conducting research, analysis and development relevant to your engagement in the AIA Vitality program, products and services offered by **us**, **our** partners of the AIA Vitality program, facilitating your use of **our** websites and other purposes **we** notify to you.

We will not collect and use your Personal Information in your AIA Vitality membership account for **our** insurance applications, underwriting or claims assessments. However, it is your statutory responsibility to separately disclose any relevant information and fully answer the questions in your insurance application (new applications and when making changes to your policy in the future), as **we** will not be deemed to have knowledge of your AIA Vitality information for insurance application and underwriting assessment purposes.

We may collect your Personal Information from, and exchange your Personal Information with:

- Your Representatives
- AIA Vitality Company Limited (incorporated in Hong Kong) and Discovery Holdings Limited (incorporated in South Africa)
- The issuer of any product to which your AIA Vitality membership (or entitlement thereto) is linked, and
- The third party service providers of these entities.

We may also copy your Representatives in email communications sent to you in respect of your AIA Vitality membership and the AIA Vitality program.

If you are an AIA Vitality member that is also an employee with **us**, Personal Information you provide solely as part of your AIA Vitality membership will be accessed by **our** personnel and third parties for the purpose of administering the AIA Vitality program and as otherwise set out in this policy. Where practicable, access to AIA Vitality-related Personal Information will be limited to those personnel who are directly or indirectly involved with the AIA Vitality program and relevant Products and Services you hold with **us**. AIA Vitality-related Personal Information will not be used

in making decisions relating to your employment with **us** (including hiring decisions).

Collection and disclosure – AIA Vitality Partners

We may collect your Personal Information from, and provide your Personal Information to, AIA Vitality partners and other providers of health and wellbeing checks and assessments (including, but not limited to, dietitians, pharmacists and trainers) and benefits (including, but not limited to, discounts, cashbacks and rewards) under the AIA Vitality program (together, AIA Vitality Partners). **We** will only do this to the extent necessary for **us** to administer the AIA Vitality program (for example, if you choose a service or reward provided by that AIA Vitality Partner under the AIA Vitality program). **We** will not disclose your Personal Information to AIA Vitality Partners for the purpose of direct marketing unless you consent to this or as otherwise permitted by law.

Collection and disclosure – Eligible private health insurance customers

Where you tell **us** you are covered under or would like to be covered under an eligible private health insurance policy through myOwn, **we** may exchange your personal information with myOwn and its third party service providers for the purpose of confirming the information you provide to **us** and facilitating your application, administration, claims and other support services **we** undertake on behalf of myOwn.

Eligible private health insurance customers of myOwn may apply to become members of AIA Vitality.

If you are a customer of myOwn or an eligible insured person under a policy issued by myOwn and you have activated an AIA Vitality membership, **we** may collect your Personal Information from, and provide your Personal Information to, myOwn as well as its contractors and agents.

Our staff (current and former, including contractors)

With respect to **our** staff (both current and former, including contractors), **we** may also collect, use and disclose your Personal Information in specific circumstances applicable to your situation as described below.

We collect Personal Information as part of your current or former employment and/or engagement with **us**.

The types of Personal Information **we** collect may include:

- Identifying information (e.g. date of birth and employee identification and number)

- Photographs, videos and images
- Qualifications and experience
- Information relating to your current or former employment or engagement, including the terms and conditions of your employment or engagement
- Your training, performance, conduct, disciplining, resignation or termination
- Background checking and employment screening information including whether you may have a criminal record
- Membership of a professional or trade association, trade union membership
- Leave details, and
- Taxation, banking and superannuation affairs.

We are required or authorised to collect your Personal Information under various laws, including without limitation, the *Fair Work Act*, *Superannuation Guarantee (Administration) Act*, *Superannuation Industry (Supervision) Act*, taxation legislation (including without limitation, the *Income Tax Assessment Acts*, and *Taxation Administration Act*), *Life Insurance Act*, and *Australian Prudential Regulation Authority Act* and regulations and other instruments made under or pursuant to those laws. **We** may take steps separate to this Privacy Policy to ensure you are aware of any other relevant laws.

We collect, use and disclose your Personal Information for all purposes relating to your current or former employment or engagement including for example:

- Assessing your suitability
- Engagement and training
- Disciplining
- Payroll and superannuation
- Health and safety
- Insurance (including WorkCover)
- Administration and staff management purposes
- AIA Vitality membership
- Internal and external publications, and
- Other purposes that **we** may notify to you.

We may exchange your Personal Information with law enforcement and background checking or employment screening agencies and educational or vocational organisations to verify your qualifications and whether you have a criminal record in certain circumstances; our distributors and clients; your health service providers; your Representatives (including unions) and **our** service providers including providers of online services, recruitment, payroll, banking, staff benefits, staff rewards and share programs, surveillance and training services.

We may also collect, use, disclose or exchange other types of Personal Information and may conduct or engage background checking or employment screening agencies to

conduct other checks under **our** applicable policies and in certain circumstances, and **we** may exchange the results of background checks and employment screening information with **our** distributors and clients for the purposes of assessing your suitability for employment or engagement.

Job applicants

We collect Personal Information as part of your job application, including your qualifications, experience, professional memberships, achievements and work history.

We collect, use and disclose your Personal Information for purposes including, but not limited to, assessing your application, assessing you for a position or positions with **us**, assessing your suitability (including whether you are suitable to progress to each stage of the recruitment process for a position), storing your information for future job opportunities and other purposes **we** notify to you.

We may exchange your Personal Information with recruitment agencies, online service providers, organisations that conduct competency or psychometric tests, referees, current and previous employers, law enforcement and background checking or employment screening agencies, and educational or vocational organisations to verify your application details and whether you have a criminal record in certain circumstances.

We may also collect, use, disclose or exchange other types of Personal Information and may conduct or engage background checking or employment screening agencies to conduct other checks under **our** applicable company policies.

Our website and emails

If you visit **our** website to read, browse, sync, upload or download information, **our** system may record information such as the date and time of your visit to **our** websites, the pages accessed and any information uploaded, downloaded or synced. This information is used for purposes including statistical, reporting and website administration and maintenance purposes and to help **us** better manage, analyse and develop **our** websites, communications and products.

Like many other websites, **our** websites may use 'cookies' from time to time. A cookie is a piece of information that allows **our** systems to identify and interact more effectively with your device. The cookie helps **us** to maintain the continuity of your browsing session and remember your details and preferences when you return. You can configure your web browser software to reject cookies, however some parts of **our** website may not have full functionality in that case.

When **we** send you emails or other electronic messages, **we** may record where you open the message and click on particular links. This helps **us** to better understand what information is of interest to you. When you use **our** websites,

make an enquiry or apply for policy or product using **our** websites or **our** online forms, **we** may collect Personal Information about you and use web analytics in relation to this information to help **us** better manage, analyse and develop **our** websites, communications and products. **We** may use cookies, which may personally identify you, to identify traffic source, to improve **our** websites and your experience, to adjust **our** website content and for other purposes set out in this Privacy Policy.

In some cases third parties may use cookies and other technologies such as web beacons and JavaScript on **our** websites in connection with online services like banner advertising, website analytics, brand monitoring and surveys. This may allow them to collect information about your use of **our** websites (including your computer's IP address) which they may store in the United States, Japan, South Africa, Switzerland, the United Kingdom, members of the European Union, Mauritius, Bermuda, Hong Kong, Singapore, Malaysia, Philippines and other countries in which **we** operate or other countries. The use of these technologies allows them to deliver customised advertising content, measure the effectiveness of their advertising, evaluate users' use of **our** websites, to communicate with you or respond to feedback or complaints, to manage **our** relationship with you, to monitor and protect **our** brands, and other websites and provide other services relating to website activity and internet usage. Those third parties may also transfer the information they collect to others where required to do so by law, or where those others process the information on their behalf. The services **we** may use from time to time (including via **our** websites) may include: Google Analytics; Google AdSense; Marketo; Inbenta; DoubleClick; Yahoo; Salesforce (or any other call centre provider); Radian6; Adobe/Omniture, and Microsoft.

We use web analytics reporting software (including but not limited to Google Analytics Demographic and Interest Reporting), to report and measure traffic patterns to, from and within **our** websites. The tracking technology collects various information, including which pages are visited; the number of visitors; paths taken within the website; duration of visits and entry/exit points to the website; age, gender and interests, and may in some cases recognise the visitor's domain name and IP address. However, **we** do not use, gather, store or retrieve Personal Information using this software to identify the actual user. **We** use aggregated reporting provided by web analytics to better understand website traffic and webpage usage, to improve **our** websites and your experience, to adjust **our** website content and for other purposes set out in this Privacy Policy.

You can find more details in the privacy policies for the services **we** use, including information on how to opt out of certain conduct.

If you are considering sending **us** any other Personal Information through **our** websites or other electronic means,

please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email, standard HTTP). **We** are subject to laws requiring **us** to protect the security of Personal Information once it comes into **our** possession.

Our websites may contain links to other sites. We recommend that you carefully read and familiarise yourself with all relevant terms and conditions, privacy practices, policies and guidelines of those sites (as amended from time to time) and select the privacy and security settings that you are comfortable with. **We** are not responsible for the consent, security, privacy practices, policies or guidelines of those sites.

Social media

We may, from time to time, have or maintain a presence on social media such as Facebook, YouTube, Twitter and LinkedIn. You can interact with **us** via social media where **we** maintain a presence. Depending on the particular social media platform, **we** may collect, use, handle, store and disclose, in the manner described in this Privacy Policy, Personal Information, including without limitation, the following types of information, as applicable:

- Your name
- Your email address
- Your profile picture and other photos
- Usernames, aliases, pseudonyms or login IDs
- Your telephone number
- Your postcode/suburb/state of residence
- Your mailing address
- Your company name, job title and industry
- Your gender
- Other information contained in your profile such as your education, relationship status, sexual preference, religious views, political views and links to online properties and other social media accounts
- Comments you make or submit and any responses to such comments (including our responses and the responses of any other person or through a competition, giveaway, event or activity run by us or one of **our** partners)
- Information about your interactions with **us** on social media platforms, including the date and time of your visit, which parts of **our** social media pages you visited and what information or material you viewed or downloaded. This information is used for statistical, reporting, administrative and maintenance purposes.

When you interact with **us** via social media, you consent to any Personal Information you provide or disclose (including any of the above, as applicable) being collected, used and disclosed by **us** in the manner described in this Privacy Policy. You should be aware that interactions on social

media with **us** may, depending on the particular social media platform you choose, and on the settings you choose on each such platform that relate to privacy and security, be immediately publicly visible to all users of the platform.

Social media platforms are not bound by **our** Privacy Policy and may each have their own privacy policies or statements or similar (Platform Privacy Policies). Platform Privacy Policies vary from platform to platform. The rights that the various social platforms reserve for themselves as stated in their applicable Platform Privacy Policies in relation to information you provide when you are interacting with **us** via such platforms are likely to be different to **our** policies as set out in this document. **We** recommend that when interacting with **us** via social media, you avoid disclosing Personal Information in a way that makes it publicly available. **We** publish social media "House Rules", available via **our** various social media pages, which contain more information about recommended "dos and don'ts" in relation to disclosing Personal Information on social media. **We** recommend that you read **our** social media "House Rules".

In addition, platform providers' terms of use, terms of service or rules and the like (Terms of Use) and their Platform Privacy Policies are likely to be governed by the laws of a jurisdiction other than Australia. Privacy laws that apply to the platform operators and to their obligations in respect of information you provide are likely to be different to Australian privacy laws. The legal protections afforded to you by such laws may be substantively different to those available under applicable Australian laws.

Your use of social media platforms will also be governed by the Terms of Use published from time to time by the various platform providers. **We** accept no responsibility for the Terms of Use or Platform Privacy Policies of the social media platforms you use to interact with **us**.

We recommend that, before using social media to interact with **us**, you carefully read and familiarise yourself with the social media platform provider's Terms of Use and Platform Privacy Policies and the privacy and security settings available for that platform and select the settings that you are comfortable with.

If the social media platform provider amends or updates its Terms of Use or its Platform Privacy Policies, carefully review the proposed changes to understand how they may affect your continuing use of the platform.

Anonymity

You may choose to communicate or interact with **us** (to ask general enquiry type questions) anonymously or by using a pseudonym. Please be aware that this may reduce **our** ability to interact with you. In some circumstances **we** are often governed by strict regulations that require **us** to know who

we're dealing with. In general, **we** won't be able to deal with you anonymously or where you are using a pseudonym when it is impracticable or **we** are required or authorised by law to deal with you personally.

Security

We take steps to protect Personal Information from misuse, interference and loss, including by implementing physical, technical and administrative security standards to secure and protect your Personal Information from unauthorised access, modification or disclosure. Steps **we** take can include implementing and imposing:

- Confidentiality requirements on **our** employees and other representatives, as well as third parties
- Policies on document storage security
- Security measures for access to **our** systems
- Identification procedures prior to providing access to information
- Control on access to **our** premises, and
- Website protection security measures.

Retention/Destruction

When all of **our** legal obligations to retain your information have expired, or **we** no longer need your information for a purpose permitted under law, **we** will take such steps as are reasonable to destroy or de-identify it.

Accessing and updating your Personal Information

In most cases you are entitled to access the Personal Information **we** hold about you and request that **we** correct your Personal Information if it is inaccurate, incomplete or out of date. Please contact **us** by phone or via **our** websites (refer to How to Contact Us) if you would like to request access or make any corrections about information **we** hold about you.

Please note that in relation to Personal Information provided via social media, **we** can only provide access to or correct information held by **us**. You must direct requests for access to or correction of personal information held by the social media platform provider directly to the relevant platform provider.

We will generally respond to requests for access as soon as possible or at least within 10 business days. If a request is straightforward, **we** will often grant access within 10 days or, if the request is more complicated, within 30 days. **We** will contact you if **we** cannot provide you with the information within 10 business days. **We** may need to verify your identity before providing access.

In some circumstances, **we** may not permit access to your Personal Information where, for example, such access would be unlawful or denying access is authorised by law. In these cases, **we** will provide you with a schedule of documents **we** have declined and the reason for doing so, together with details of **our** complaints process. If you disagree with **our** refusal to correct your Personal Information, you can ask **us** to append an explanatory note to the information.

Contact us

If you have any questions or concerns about your Personal Information, please contact **us** by phone or via **our** websites.

AIA Australia – Phone: 1800 333 613

Website: aia.com.au and click on Contact Us.

Postal address: PO Box 6111, Melbourne, VIC, 3004

CMLA – Phone: 13 10 56

Website: commbank.com.au/insurance and click on Contact us for details.

Making a privacy complaint

If you have a concern or complaint about your privacy, please contact **us** so **we** can try to resolve your concerns or complaint. **We** have internal dispute resolution processes for handling customer complaints, including making a privacy complaint. This dispute resolution mechanism is designed to be fair and timely to all parties and is free of charge.

If you have a concern or complaint about **our** handling of your Personal Information, you can contact **us** as above or in one of the following ways:

- Call us on 1800 333 613 (select option 2)
- Email us at au.complaints@aia.com
- Email us at au.groupcomplaints@aia.com if your insurance is provided via your superannuation fund
- Mail us at AIA Australia, PO Box 6111, Melbourne, VIC, 3004
- Contact your financial adviser
- Contact your product provider – for example, your superannuation fund, directly
- Complete the complaint form via **our** websites.

We aim to resolve complaints promptly and within 45 days after receiving your complaint.

If you are a current or former employee or contractor of **ours**, any complaint about company compliance with privacy laws will be handled in the manner described in the applicable Human Resources policy or procedure where available.

If your complaint is not resolved to your satisfaction by **our** internal dispute resolution process, you may take your complaint to:

The Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Web: www.oaic.gov.au
Email: enquiries@oaic.gov.au

Changes to this Privacy Policy

We may amend this Privacy Policy from time to time. If **we** do, **we** will post an amended Privacy Policy on **our** websites so that you will always be aware of how **we** manage Personal Information.

We will publish **our** latest Privacy Policy on **our** websites. This supersedes and replaces all previous Privacy Policies and/or Privacy Statements and privacy summaries that you may receive or access, including those contained in or referred to in any telephone recordings and calls, applications, underwriting and claim forms, Product Disclosure Statements and other insurance and disclosure statements and documentation. This Privacy Policy is also available upon request by contacting **us**.

AIA Australia

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