

AIA AUSTRALIA GROUP PRIVACY POLICY



HEALTHIER, LONGER,
BETTER LIVES

December 2024

Incorporating AIA Australia Limited, AIA Financial Services Pty Limited, CMLA Services Pty Ltd, Jacques Martin Pty Ltd, Jacques Martin Administration and Consulting Pty Ltd.

1. Introduction

This is the privacy policy for AIA Australia Limited (ABN 79 004 837 861 AFSL 230043) (AIAA), AIA Financial Services Pty Limited (ABN 68 008 540 252 AFSL 231109, trading as AIA Financial Wellbeing) and their related bodies corporate, being CMLA Services Pty Ltd, Jacques Martin Pty Ltd and Jacques Martin Administration and Consulting Pty Ltd, collectively referred to throughout as “the AIA Australia Group”, “we”, “us” and “our”).

This privacy policy also applies in relation to the use, sharing, exchange, disclosure and storage by AIAA of personal information you had previously provided to The Colonial Mutual Life Assurance Society Limited (CMLA) where the insurer is now AIAA.

We provide a range of life insurance and related products and services, including financial planning and advice, and health and wellness membership programs through AIA Vitality (to learn more about AIA Vitality go to aiavitality.com.au). We also distribute eligible private health insurance products issued by AIA Health Insurance Pty Ltd ABN 32 611 323 034, (a registered private health insurer and referred to throughout this policy as “AIA Health”) (to learn more go to health.aia.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 Council of Australian Life Insurers’ (“CALI”) 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, web chat services, 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 at 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 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.

2. Information we collect

We collect information, including your personal and sensitive information (referred to collectively throughout this document as “Personal Information”), from you or from your authorised representatives (where applicable), when you contact us, enquire about, apply for, hold, change, use, transact, interact or make a claim under any of our Products and Services.

3. 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, web chat services and information collected from social and networking services such as Facebook and X (formerly known as Twitter), when we communicate and engage with you by phone, SMS, email, web chat services, 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 may also collect and exchange information about you from and with 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;
- AIA Health and their service providers;
- Insurers (including worker’s compensation insurers, authorities, other private health insurers and their contractors, services providers, agents and related bodies corporate);
- Other financial services organisations involved in providing, managing or administering products or services recommended as part of financial advice we may provide to you;
- 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);
- Commonwealth Bank of Australia (ABN 48 123 123 124) (CBA);
- The issuer of any product, including our Products and Services to which your AIA Vitality membership is linked 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 where relevant 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 AIA Health;
- 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, source of funds and source of wealth;
- 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 them 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 3rd 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)*
- *Financial Sector (Collection of Data) Act 2001*
- *Anti-Money Laundering and Counter-Terrorism Financing 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.

4. 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;
- To provide you with financial advice;
- For reinsurance purposes;
- To communicate with you or respond to feedback, enquiries, and manage complaints and disputes, including in relation to our Products and Services held by you;
- 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;
- Gather and aggregate information for statistical, prudential, actuarial, data analytics 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
- Meet requirements imposed by law;
- To monitor your use of our websites, apps, social media platforms, and other digital properties, and conduct analysis of the use of them in order to personalise, operate, evaluate and improve them and our products and services, understand your preferences and troubleshoot any problems;
- 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; to assist in law enforcement purposes, investigations by police or other government or regulatory authorities and to meet reporting obligations and requirements imposed by law or agreed to with government or regulatory authorities in any jurisdiction;
- Ascertain or 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, designing new or enhancing, updating, improving our products, services and offerings;
- To monitor and protect our brands; and
- To manage our business.

5. Commonwealth Bank of Australia (CBA)

We have distribution, administration and other services agreements with CBA who provide services to support our sales 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, respond to queries or complaints about us or our products and services. We may also share information for identity

verification, compliance and reporting under anti money laundering and other legislations and foreign tax compliance reporting in respect of which we and the 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, related documents and certifications, including identity documents like 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 www.commbank.com.au and click on Privacy at the bottom of the page. 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 AIA Australia Group members.

6. 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 the telephone, email 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 Section 12 of this Privacy Policy.

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, web chat services, email or other electronic address).

7. What to do if you do not wish to provide information, or to receive marketing communications?

If you are unwilling to provide us with the information that 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, provide, administer or manage our Products and Services you have with us, or 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.

8. Who may have access to my personal information?

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

- Our intermediaries;
- Our partners (including but not limited to entities with which AIA Australia has partnered in relation to the AIA Vitality program in accordance with the procedures described under Section 12 of this Privacy Policy, and partners used in co-branded activities or business initiatives);
- Members of the AIA Group;
- Accountants and financial institutions you nominate;
- Reinsurers, where we reinsure any insurance cover we provide or offer or propose to provide to you;
- AIA Health Insurance Pty Ltd;
- Other insurers (including worker's compensation insurers, authorities, other private health insurers) and their contractors and agents;
- Other financial services organisations involved in providing, managing or administering products or services

recommended as part of financial advice we may provide to you;

- Any employee, agent, service provider, contractor or third-party who provides administrative or other services to AIA Australia or any partners (those services may include health, insurance and reinsurance, financial advice, 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 AIA Australia 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) 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 the telephone, email 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; 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).

9. 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. Your personal information and data is likely to be shared or accessible by recipients in:

- the United States;
- Canada, including our third-party service provider who assists us to investigate, manage and prevent suspected improper conduct such as fraud;
- South Africa;
- Switzerland;
- the United Kingdom;
- France;
- Germany;
- India;
- Hong Kong;
- Singapore;
- Malaysia;
- Philippines;
- China; and
- other countries in which AIA Group companies operate including our affiliates, AIA Vitality Company Limited, and their respective service providers, affiliates and business partners which may include Slovakia, Poland, Ireland, Japan, New Zealand, Denmark, Sweden and Northern Ireland.

For more information about the countries that we operate in, go to our websites and click on about us. For CBA list of countries go to commbank.com.au/security-privacy/country-list.pdf

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.

10. 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 Section 12 of this Privacy Policy, 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 Section 22 of this Privacy Policy.

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.

11. 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 and rewards, 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, underwriting or claims 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, underwriting assessment and claims 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).

12. 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.

13. 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 AIA Health, we may exchange your personal information with AIA Health 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 AIA Health.

We may also disclose your Personal Information to AIA Health for the purpose of direct marketing (for an indefinite period including after you may cease your membership with us) unless you contact us to withdraw your consent. If you have a separate engagement with AIA Health, opting out of this process with AIAA may not cease receipt of direct marketing.

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

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

14. Our Staff (current and former, including Contractors)

With respect to our staff (both current and former, including contractors), we may 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, including your Tax File Number and Superannuation account details.

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 (including personal milestones)
- Disciplining
- Payroll and superannuation
- Health and safety
- Insurance (including WorkCover)
- Administration and staff management purposes
- AIA Vitality membership
- Internal and external publications
- 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 personal details, qualifications and whether you have a criminal record, or other records (e.g., bankruptcy), 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.

15. Job Applicants

We collect Personal Information as part of your job application or submitting of your expression of interest for a role, 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.

16. Our Websites and Emails

If you visit our websites 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.

17. Social Media

We may, from time to time, have or maintain a presence on social media such as Facebook, YouTube, X (formerly known as Twitter), Tik Tok, Instagram and LinkedIn. You can interact with us via any 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 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 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 Privacy Policies, carefully review the proposed changes to understand how they may affect your continued use of the platform.

18. Anonymity and Pseudonymity

You may choose to communicate or interact with us anonymously or by using a pseudonym, for example to make a general enquiry. Please be aware that this may reduce our ability to interact with you. In some circumstances we are 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 or after obtaining your identification and personal information details or after ascertaining or verifying your identity.

19. 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, use 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.

20. Retention and Destruction of Personal Information

When our legal obligations to retain your personal 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.

21. 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 Section 22 of this Privacy Policy) 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 them.

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.

We may, at times, impose a charge for giving access to requested Personal Information.

22. Contacting Us

If you have any questions or concerns about your Personal Information, please contact us at the following:

For AIA Australia

- Phone: 1800 333 613 (8:30 am to 5:30 pm AEST/AEDT, Monday to Friday).
- Website: aia.com.au and click on "Contact Us".
- Mail: PO Box 6111, Melbourne VIC 3004.

For AIA Financial Wellbeing

- Phone: 1800 434 044 (8:30am to 5:30pm AEST/AEDT, Monday to Friday).
- Website: aia.com.au/en/financial-wellbeing and click on "Contact Us".
- Mail: PO Box 6051, Melbourne VIC 3004

23. Making a privacy complaint

If you have a concern or complaint about your privacy, please contact us so we can try to resolve it. We have internal dispute resolution processes for handling customer complaints, including privacy complaints. 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, in addition to our contact details listed under Section 22 of this Privacy Policy, you can contact us in one of the following ways:

For complaints relating to AIA Australia

- Email: au.complaints@aia.com
- If your insurance is provided via your Superannuation fund, email: au.groupcomplaints@aia.com
- Contact your Financial Adviser
- Contact your product provider, for example Superannuation Fund, directly
- Complete the [complaint form via our website](#).

For complaints relating to AIA Financial Services

- Complete the [complaints form on our website](#) and we will get in touch with you
- Email: complaintsAFW@aia.com
- Contact your Financial Adviser directly
- Contact your policy provider directly

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 choose to take your complaint to:

The Office of the Australian Information Commissioner

GPO Box 5288

Sydney NSW 2001

Phone: 1300 363 992

Web: oaic.gov.au

24. Changes to this Privacy Policy

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

This Privacy Policy 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.