

# Privacy Statement

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We regard privacy as an important right for our customers. Information provided to us by our customers is protected by our strict standards, upheld by policies and procedures that comply with Commonwealth Government privacy laws.

We offer several customer service applications on this site that are designed to provide you with information about Manton Group Pty Ltd Trading as MBM Insurance Solutions is an authorised representatives of Resilium Pty Ltd and Resilium Insurance Broking Pty Ltd [and any other Licencees if applicable] and any related products and services. Such applications may require you to input information, such as name and address in order for us to respond to your enquiries.

## This Policy

This is “our” policy statement on the management of personal information and sensitive information. “*Personal information*” means information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not. “*Sensitive information*” is a component of personal information and relates more specifically to information that, by its “sensitive” nature, may have the potential to be used to discriminate against someone.

We appreciate that as a customer of ours, you trust us with your personal information and sensitive information, and we are committed to safeguarding your privacy. We will comply with the Australian Privacy Principles of the *Privacy Act (Cth) 1988*, as amended (“the Act”).

## OUR PRIVACY PRINCIPLES

### 1. Consideration of personal information privacy

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We manage your personal information in an open and transparent way taking such reasonable steps to ensure that our practices, procedures and systems relating to our activities and handling enquiries or complaints in compliance with the Australian Privacy Principles.

### 2. Anonymity and pseudonymity

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We will only collect personal information if it so reasonably necessary or directly related to our business in our relationship with you.

### 3. Collection of solicited personal information:

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We collect and use your personal information only for the purpose of providing and administering products and services to you as Authorised Representative of General Insurance Licencees. The details of what types of personal information we collect can be found in the questions we ask that are reasonably necessary and/or in the forms we provide for you to complete. We may use your personal information to keep you up-to-date on our new products and services. You can choose, if you require, to change this contact at any time.

#### ***Personal Information other than sensitive information:***

We will disclose your personal information only for the purpose for which it was collected and where reasonably necessary. This may include disclosing your personal information to third parties, with whom we have arrangements to protect your privacy, where the information forms part of investigations relating to your insurance policies with us but not limited to situations of any insurance claims, claims disputes, credit reference providers, investigative or due diligence processes we are required to undertake, or where the law stipulates we are required to disclose.

#### ***Sensitive Information:***

We will only collect sensitive information with your consent and where the information is reasonably necessary and directly related to delivering products and services to you, forms part of our due diligence process, or where the law requires or authorises the collection of such information.

## **4. Dealing with Unsolicited personal information**

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We will take reasonable steps to ensure that any personal information we hold about you is accurate, complete and up-to-date. You can contact us to update any of your personal information when it changes. We will take steps to protect personal information held about you from misuse, loss or unauthorised access, modification or disclosure. Information security policies are in place to minimise the risk of unauthorised access to your personal information, and where lawfully reasonable destroy or de-identify information.

## **5. Notification of the collection of personal information**

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We may contact you to confirm your personal information to ascertain whether it is accurate, complete and up to date. When making contact with you we will identify ourselves and the purpose for the request for information and when it will be used.

## **6. Use and Disclosure of Personal and Sensitive Information**

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### ***Personal Information***

When we collect and hold personal information about You it is collected for a particular purpose and it will not be disclosed for another purpose, unless you have consented to the use or disclosure of the information or where it forms part of the products and services we provide to you. We also provide for occasions where you may need to correct your information.

### ***Sensitive Information***

When we are required to collect sensitive information we will only use or disclose such information where is directly related to the primary purpose of its collection, required by law, or that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities under the Act.

## **7. Direct Marketing**

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When we collect and hold personal information, we do not disclose the information for the purposes of direct marketing, except where you have provided us with your information, would reasonably expect us to communicate our product and services to you, or where you have requested not to receive direct marketing communications.

## **8. Cross Border disclosure of Personal Information**

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When handling your personal information and in circumstances where the recipient is overseas we ensure that the overseas recipient does not breach the Australian Privacy Principles. Should you request or consent to a transaction or service where your personal information may be transferred to another country, and your information may be transferred to a country that does not have the same privacy laws as Australia. This transfer will only occur if you consent to such transfer of information and your consent will form part of your initial consent to provide us with such information.

## **9. Use or Disclosure of Government Identifiers**

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Identifiers are unique numbers that a Commonwealth Government organisation has assigned to you. These include tax file numbers and Medicare numbers. We will not adopt or assign any of these Commonwealth Government identifiers as our own identifier of you, unless it is required or authorised by Australian law or a court/tribunal.

## **10. Quality of Personal Information**

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We take reasonable steps to ensure that all personal information we collect from you is accurate, up-to-date and complete. We take steps to ensure that the personal information we use or disclose is relevant and for the purpose of the use or disclosure, and is accurate, up-to-date and complete.

## 11. Security of Personal Information

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When we collect and hold your personal information, we take all reasonable precautions to protect the information from misuse, interference, loss, unauthorised access, modification or disclosure. Where necessary and when legally required we will destroy information or de-identify to protect such personal information.

## 12. Access to Personal Information

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We are required to ensure that the personal information we collect is accurate. If any of the personal information you have provided us changes at any time, or you find that any information is inaccurate, you **must** contact us to enable us to update your records. You can request access to your personal information, by phoning (07) 3816 0499 or writing to us at MBM Insurance Solutions Pty. Ltd., PO Box 487 Booval Fair Qld 4304. You can request your person information by phoning or writing to the relevant office who looks after your account. These details can be found on the contacts page. We are required to respond to your request within 30 days or if it takes an extended period of time will inform you of any likely delay. We may charge for the costs of providing access to your personal information, however we will inform you if a charge applies before we proceed with your request. The Australian Privacy Principles outlines circumstances under which we may deny access to some or all of your personal information. These circumstances include situations where it may impact the privacy of other individuals, poses a serious threat to the life, health or safety of any individual or the public as prescribed under the law. In such cases we will give reasons for our decision and response to you.

## 13. Correction of Personal Information

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When we collect your personal information we will take such reasonable steps to update the information to ensure it is accurate, up to date, complete, relevant and correct.

### ***Breach of Privacy and Complaints***

In the event we become aware of a privacy breach relating to the personal information it has been provided it will:

- follow its established policy, procedure and guidelines to resolve the matter, and
- where applicable advise the individual and general public of the privacy issue.

Where you have a complaint about your personal information or you believe there is a breach of privacy we ask that you contact us by phoning (07) 38160499 or write to us at MBM Insurance Solutions Pty Ltd, PO Box 487, Booval Fair QLD 4304 of your concerns.

We have an internal dispute resolution process to address such issues. The Office of Australian Information Commissioner ("OAIC") suggests you allow 30 days for MBM Insurance Solutions to respond to your privacy complaint, and then you may contact the OAIC with your complaint.

If you are not satisfied with our decision you can direct your complaint to the OAIC in 1 of 4 ways:

- The OAIC online "Privacy Complaint Form" at [www.oaic.gov.au](http://www.oaic.gov.au)
- By mail (if you have concerns about postal security, you may wish to consider sending your complaint by registered mail);
- By fax (02) 9284 9666
- By email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) (Note: email that is not encrypted can be copied or tracked).  
The Office of the Australian Information Commissioner,  
GPO Box 5218, Sydney NSW 2001  
Phone: 1300 363 992. If called from outside of Australia call (02) 9284 9749.

### ***Future Changes***

From time to time we may review this Privacy Statement and its Privacy Policy and will amend it to reflect changes in legislation, industry codes or in the business environment. The Privacy Policy Statement will be available at [www.mbminsurance.com.au](http://www.mbminsurance.com.au)