

> HDI Global Specialty SE – Australia

> Privacy Policy

Who are we?

HDI Global Specialty SE is a general insurance company registered in Germany. In Australia, we operate through our branch entity, HDI Global Specialty SE – Australia (ABN 58 129 395 544, AFSL 458776), which is authorised by the Australian Prudential Regulation Authority to issue insurance products in Australia.

Policy Statement

HDI Global Specialty SE (including its branches) (**we, us, our**) is committed to ensuring that all Personal Information is handled in accordance with the Privacy Act 1988 (Cth) (**the Privacy Act**) and the Australian Privacy Principles (**APPs**) and, where applicable, relevant State or Territory legislation. The Privacy Act sets out the requirements for our handling of your Personal Information.

We may, from time to time, review and update this Privacy Policy and will publish any updated versions at <https://www.hdi.global/en-au/legal/privacy/> (**our Website**). This Privacy Policy should be read together with any terms or conditions or contract we have with you, and any other location-specific notices provided to you or that are specifically applicable to you as available on our Website.

What types of Personal Information do we collect?

We collect Personal Information, including Sensitive Information, to the extent necessary for our functions or activities.

‘Personal Information’ means information or opinion about an identified individual, or an individual who is reasonably identifiable, or as otherwise defined by applicable privacy or data protection law. It does not include information that is de-identified (anonymous data).

‘Sensitive Information’ is Personal Information of a sensitive nature and includes information about an individual’s health, genetics, race, political opinion or membership, religion, philosophical beliefs, union membership, sexual orientation and criminal record.

The types of Personal Information which we collect will depend on our relationship with you. We have set out a non exhaustive list of some examples below.

Customers

Where you become a customer of ours (e.g. you take out a contract of insurance with us), make a claim or enquire about a claim or our products or services, we may collect your name, address and contact details, date of birth,

gender, health information, claims history, criminal records, driving records and credit history records. We may also collect other information that you provide or disclose to us, or that we request from you (as relevant to our dealing with you or your contract of insurance, or otherwise so we can provide you with our services/products and/or process your claim).

Employees

Under the Privacy Act, the APPs do not apply to certain Personal Information contained within an employee record, where directly related to a current or former employment relationship between us and the employee. As a result, this Privacy Policy does not apply to all employee information. If you are an employee, contractor or job applicant in Australia, this Privacy Policy should be read together with your contract and any other legal notices relevant to you (as applicable) or available on our Website.

Other individuals

We may collect Personal Information from other individuals who are not customers or employees. This includes our individual service providers and contractors and other individuals who interact with us on a commercial basis. Generally, it would include your name, contact details, identification details, any required background checks or relevant business experience, and any other information relevant for our interactions and transactions with you.

Visitors to our Website

Visitors to and users of our website should refer to our data protection terms which can be found at: <https://www.hdi.global/en-au/legal/privacy/>

HDI Guardian App

Users of this app should refer to the separate Privacy Policy available at <https://www.hdi.global/en-au/legal/privacy/>

Collecting your Personal Information

We collect Personal Information, including Sensitive Information, relating to our customers or potential customers for a range of purposes and in a number of ways as set out below. Sometimes we will collect this information directly from you. However, we normally collect this information from agents, insurance brokers and other insurance intermediaries (**Authorised Third Parties**) that you have approached for insurance products and/or services. Where these Authorised Third Parties collect your Personal Information and pass it on to us, they are responsible for obtaining your consent to that collection (as necessary) and making you aware it will be disclosed to us. Any Personal Information you provide directly to these third parties will be managed in accordance with that Authorised Third Party’s privacy policy, as well as ours, as relevant.

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From time to time we may collect Personal Information about you through other third parties that assist us or that we rely on for information or assistance in providing our services, for example claims management providers, credit reporting agencies and trade sanctions check providers.

Where you provide Personal Information to us about another individual (for example information about your spouse or partner, your child(ren), dependents or emergency contacts, or your employees/contractors or consultants, (as applicable), you should provide these individuals with a copy of this Privacy Policy beforehand or ensure they are otherwise made aware of how their Personal Information will be used by us.

You may refuse to provide us with your Personal Information or Sensitive Information. However, if you refuse to provide us with your Personal Information or Sensitive information, we may be unable to assist you or provide you with our products or services.

Purpose of collection

We generally collect Personal Information for the purpose of providing our products and services, assessing applications for insurance and administering our insurance policies, including any claims, and performing our obligations under any contract we have with you. Further reasons we may collect your Personal Information include:

- answering your queries or providing other professional services you may request;
- to fulfil administrative functions associated with our services/products including processing payments;
- to assess, develop and improve our services/products, undertake market research and/or analytics;
- to notify you about market updates, our seminars and training that we provide;
- to satisfy our legal and regulatory obligations, to carry out risk analysis and business continuity functions, for fraud prevention and risk management, in order to exercise a duty of care; and
- to respond to and manage enquiries, complaints, feedback and claims.

Depending on your relationship and interactions with us, we may collect and use your Personal Information for the above purposes, as well as:

- any related secondary purpose which we believe you would reasonably expect when we collected your Personal Information or as a result of our ongoing relationship with you;
- any purpose for which you have consented; or
- any purpose for which we are required or authorised by applicable law.



Using and disclosing your Personal Information

We may use and disclose your Personal Information for the purpose it was collected (as described in this Privacy Notice), or for another purpose with your consent or otherwise required or permitted by law or regulation.

We may disclose your Personal Information to:

- our related or associated entities for the purpose of performing our functions or corporate reporting. These related or associated entities may be located overseas in any of the countries in which HDI Global Specialty SE operates;
- service providers and third parties to carry out activities on our behalf such as claims handling services, auditing, professional advisors or providing IT services to us;
- other insurance market participants where necessary for our relationship or contract with you, including reinsurers (who may be located overseas), insurance intermediaries, insurance reference bureau, credit reference agencies, our advisers, our agents, our administrators and those involved in the claims handling process (including assessors, investigators and others), for the purpose of assisting us and them in providing relevant services and products, or for the purpose of recovery or litigation; and
- people listed as co-insured on your policy and to family members or agents authorised by you.

Protecting your Personal Information

We hold your Personal Information in electronic and physical files. We take all reasonable steps to securely retain any Personal Information we hold. This includes through the use of passwords, confidentiality and other technical and physical security measures. We regularly review our information security systems and practices to ensure they are effective at keeping your Personal Information secure.

Further information about our information security practices can be provided on request. Please be aware that no data protection and information security measures are completely secure. Despite all the measures we have put in place, we cannot guarantee the security of your information, particularly in relation to transmissions over the internet. Where cloud or electronic storage solutions are adopted, it may not be practicable to know in which country your information may be held. Accordingly, any information which you transmit to us is transmitted at your own risk. You must take care to ensure you protect your information (for example, by protecting your usernames and passwords,

policy details, etc.) and you should notify us as soon as possible if you become aware of any security breaches.

We are part of a global organisation with associated entities and service providers across the globe. It is likely that your Personal Information will be disclosed to our associated entities overseas, as described in this Policy above.

The reason for disclosure to an overseas services provider depends on the nature of the services they provide to us. For example, we may store your information in cloud or other types of networked or electronic storage, or where our software-as-a-service providers (such as Microsoft and similar providers) are hosted on servers located overseas.

Otherwise, unless we have your consent, or an exception or other lawful basis under applicable privacy laws applies, we will only disclose your Personal Information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach applicable privacy laws in relation to your Personal Information and will comply with any other requirements under applicable privacy laws relating to the offshore disclosure of Personal Information.

Marketing and opting out

We may use your Personal Information to let you know about educational events and updates from across our business or our associated entities and business partners that we think may be of interest to you. You can opt out of these communications at any time by choosing the opt out function, or by contacting us on the details below.

Cookies and non-Personal Information

In some instances, we automatically collect certain types of Personal Information when you visit our Website and through emails that we may exchange. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Further information about our use of cookies can be found by clicking the Cookies option at the bottom of our Website.

Data retention

How long we retain your Personal Information depends on the purpose for which it was obtained and its nature and sensitivity. We will keep your Personal Information for the period necessary to fulfil the purposes described in this Privacy Policy unless we are permitted or required by applicable law to hold your information for a longer period. After this period, we will either de-identify or destroy your Personal Information.

Access to your Personal Information

Generally, we will provide you with access to Personal Information we hold about you on your request, provided we are able to verify your identity first.

In limited circumstances, however, access may be refused if required or permitted by law or regulation.

If we refuse to provide you access to your Personal Information, we will explain to you why in writing. We do not charge you an application fee to access your Personal Information, but we may charge you a reasonable fee for any costs we incur that relate to the provision of access to your Personal Information e.g. photocopying costs.

If you would like to have access to your Personal Information or to correct Personal Information we hold about you, please make the request in writing using the contact details provided at the end of this Privacy Policy.

Complaints

If you are not satisfied with our handling of your Personal Information, you may contact us or make a complaint to us using the contact details set out below.

A complaint may also be made to the Office of the Australian Information Commissioner (OAIC) at:

OAIC

Address: GPO Box 5218 Sydney NSW 2001

Phone: +61 2 9284 9666

Email: enquiries@oaic.gov.au

Europe and the GDPR

If our processing of your Personal Information (or personal data) is subject to the EU *General Data Protection Regulation* (2016/679) (GDPR), the following additional information applies and provides further information about your data subject rights in relation to the processing of your Personal Information (or personal data):

<https://www.hdi.global/en-au/legal/privacy>

Contacting us

If you wish to contact us about the handling of your Personal Information, accessing or correcting your Personal Information or to make a privacy related complaint, please contact:

Privacy Officer
HDI Global Specialty SE - Australia
Address: Level 19, 20 Martin Place,
Sydney NSW 2000
E-mail: au.privacy@hdi.global