

INTRODUCTION

This Policy contains important information about how we manage personal information. It applies to all of the services offered by Compare the Market Pty Ltd ACN 117 323 378 trading as Compare the Market or Health Insurance Watch, **(CTM, we, us, our)** and the platforms through which we interact with you, including the www.comparethemarket.com.au and www.comparethemeerkat.com.au (**websites**), and www.healthinsurancewatch.com.au, your CTM Customer Account, CTM's social media accounts (**social media**) and the Compare the Market call centre (**call centre**).

We may modify this Policy at any time, and if we do, we'll publish it on the websites. We are bound by the *Privacy Act 1988* (Cth) and the Australian Privacy Principles contained within that Act, the Privacy (Credit Reporting) Code 2014 (Credit Reporting Code) and any other relevant laws.

The Services we provide include comparison services in relation to car insurance, home & contents insurance, health insurance, electricity & gas plans, travel insurance, pet insurance, life and income protection insurance, home loans, international money transfers, business insurance, and fuel.

We take such steps as are reasonable in the circumstances to implement practices, procedures and systems to ensure we comply with the Australian Privacy Principles and to enable us to deal with privacy enquiries and complaints. This Privacy Policy is reviewed and updated on a regular basis to ensure ongoing compliance with the Privacy Act and the APPs.

The Services we offer may change from time to time.

PERSONAL INFORMATION WE COLLECT

Personal Information

Depending on your interaction with us, the information that we collect may include (but is not necessarily limited to) your name, address, date of birth, gender, insurance history, employment information, marital status, proof of identification information (e.g. driver's licence, passport details), bank account details, Medicare number, details about the risk you want to insure, details regarding your financial circumstances and future requirements, details about your property values, credit information and your contact details (**Personal Information**).

In some cases we may collect information that is usually non-personally identifiable (such as location data, data about personal attributes or online identifiers) but that, taken together with other collected data, may identify you, either directly or indirectly.

Where reasonable and practicable (for example, general website browsing or basic enquiries), you may interact with us anonymously or under a pseudonym. Identification may be required where mandated by law or where it is impracticable to provide the requested service without it.

Sensitive Information

We will only collect sensitive information (for example, health information for relevant comparisons) with your consent, unless an exception under the Privacy Act applies (such as where required or authorised by law). Sensitive information includes any information about your racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, genetic or health information. Currently, we may collect information about your trade or profession, your health fund memberships, and certain other health information, in order to provide our service for certain products.

HOW WE COLLECT AND HOLD PERSONAL INFORMATION

We collect personal information from you:

- Directly and voluntarily;
- Automatically; and,
- Via third party sources.

Information provided voluntarily by you

We collect personal information you provide to us, including when you:

- Create or use a customer account on our website or through our mobile application;
- Interact with our website or call centre or video calls to obtain a quote or make an application for products and services;
- Interact with our social media, including communicating with us via social media platforms;
- Subscribe to electronic communications;
- Enter promotions or competitions, depending on the entry requirements;
- Submit an enquiry or complaint, provide feedback or make a customer service request;
- Download software and mobile applications, where you may provide your name, contact details and other information for the purposes of accessing and using the service; and,
- Participate in surveys, market research or audience testing.
- Use social sign-on (also known as social login) to create or access your customer account, in which case we will collect information from your social media account provider as described below.

We have implemented an automated messaging system (**chatbot**) on our Compare The Market Facebook account. If you decide to communicate with us via Facebook, the chatbot will collect your personal information and refer those details to us to enable us to respond to your enquiry. If you do not want to interact with our chatbot, you can communicate with us directly at <https://www.comparethemarket.com.au/contact-us/>.

Any personal information that you provide to obtain a comparison (other than compulsory third party insurance) or to purchase products or services on the websites or through the call centre is collected and managed by CTM. Personal information that you provide to purchase products or services on third party websites which are linked to our website is collected and managed by those third parties (see our Website Terms and Conditions, available on the websites, for more information about those third-party websites).

Social Sign-On

We may offer you the option to create or log in to your customer account using social sign-on (also known as social login) through third-party platforms such as Google, Facebook, Apple, or other social media providers. When you choose to use social sign-on, you are authorising the social media provider to share certain information from your social media profile with us.

The information we may receive from your social media provider when you use social sign-on includes (depending on your privacy settings and the social media provider):

- your name, email address and profile picture;
- a unique identifier associated with your social media account;
- information you have made public on your social media profile; and
- any other information you have authorised the social media provider to share with us.
- We use this information to create and manage your customer account, verify your identity, provide you with our services, and for the other purposes described in this Privacy Policy. We do not receive your social media account password.
- When you use social sign-on, you should be aware that the social media provider's privacy policy and terms of service also apply to their collection and use of your information. We encourage you to review the privacy settings and policies of any social media platform before using social sign-on. You can control the information shared with us by adjusting your privacy

settings within the relevant social media platform, or by choosing not to use social sign-on and creating a standard account with us instead.

- You may disconnect your social media account from your customer account at any time by contacting us or adjusting your account settings. Disconnecting will not delete personal information already collected, but we will no longer receive information from that social media provider in connection with your account.

Information collected automatically

We generate and maintain a record of information when you visit our website. CTM uses cookies or similar types of technology to automatically collect information including your IP address, the device you use to access our website or social media, your location, the other sites you visit and the frequency and duration of your interactions with our website.

We may track activity relating to your interaction with our email communications and with links embedded in email communications and our website or social media.

This type of information is usually collected, used and stored by CTM or its marketing company to measure the effectiveness of our advertising and how visitors use the website in order to:

- provide you with a better and more customised service and a more effective website;
- collect information on how many visitors the websites receive, how those visitors use the websites, where they came from and where they go; and,
- determine whether you have made purchases of certain products elsewhere, after using the websites.

You can configure your browser so it does not accept cookies, but this may affect the functionality of the websites. We may also collect and store information on your personal device using browser web storage and data caches.

Information provided by or collected from third parties

We may be provided with or collect information from third parties about you. This can include where:

- we engage organisations to collect personal information directly and voluntarily from you on our behalf. Where reasonably possible, we require organisations engaged on our behalf to comply with this Policy and all applicable privacy laws and regulations
- we receive information from our participating suppliers, for example, after you purchased a product from the supplier after interacting with CTM;
- we engage an organisation to conduct market research or audience testing; or
- another person provides information about you, for example, a family member arranging a policy of insurance for a family or couple health policy.

We may use analytics tools, web beacons and other technology to obtain aggregated and nonidentifiable information such as usage and user metrics collected by third parties when you interact with our website and social media. Organisations who collect such information may aggregate information collected from your interactions with us with other information they have also collected elsewhere. Third party organisations typically collect and use information under their own privacy policies. We currently obtain such information via Google Analytics and our third party ad servers.

In accordance with applicable terms of use for social media platforms and associated applications, we may be provided with information about you if you engage with us on social media.

Information for a compulsory third party insurance comparison is collected and managed by the relevant State or Territory authority in accordance with their privacy policy. The State and Territory authorities do not provide your Personal Information to CTM.

If we collect information about you from a third party, we will determine whether we could have lawfully collected that information directly from you and, if not, we will destroy or de-identify that information (provided it's lawful to do so).

WHY WE COLLECT, HOLD AND USE PERSONAL INFORMATION

We generally collect, hold and use personal information for four purposes:

1. service provision;
2. communication;
3. optimisation and enhancement; and,
4. marketing and advertising.

We may notify you that we also collect, hold and use personal information for other purposes from time to time.

Where required or authorised by law, we may also share your personal information with third parties if we genuinely believe that the sharing of that personal information is required or authorised under law, including any industry body, tribunal, court or otherwise in connection with any complaint

Service provision

We use your personal information to:

- provide you with our services and products including via our website or via our call centre;
- provide to our business partners or participating suppliers so that they can (where you have agreed) provide you with updates or information about their products and services and provide you with reminders;
- assist with any enquiry you make about home loans;
- provide to our service providers so that they can provide us with services that assist us run our business and the websites;
- reconcile transactions with our business partners or participating suppliers that supply you products because of our services;
- communicate with you about our loyalty program; and,
- provide to our service providers who we engage to provide you with your prize if you win a promotion.

In some cases, if you do not provide the information, we will not be able to provide our services to you, and in the case of a promotion, you may not be able to claim your prize.

Communication

We use your personal information to provide you with customer support, including dealing with complaints and enquiries. We may also use your information for activities including to:

- send you a summary of your quote and comparison results;
- administer competitions and promotions;
- send special offers or reminders;
- seek your opinions and feedback; and,
- telephone you about the services and products we offer.

If you win a competition that we (or our agents) run, we may also seek your consent to use your name, image (e.g. photograph) and/or voice recordings for the purpose of promoting or marketing the competition and/or our services.

Optimisation and enhancement

We use your personal information to provide, improve and maintain our website and call centre and the Services we offer, including to develop new products and services. Your information may also be used:

- to prevent abuse and fraud;
- in conjunction with other information, for analytical and statistical purposes;

- to personalise and customise your online experience, including advertisements and content; and,
- for other administrative and internal business purposes.

CTM may record details or block particular IP addresses (and where required provide those details to third parties to assist us) to maintain the integrity of the website where there is suspicious or excessive use of the websites.

If you have a customer account, we may use the information from that account to prefill relevant fields on our website to assist you to complete a quote comparison (or other activity).

Marketing and Advertising

We use your personal information to market and advertise our business and products and services to you. Your information may also be used to customize and display advertisements and content for you.

We may use various services or organisations to analyse collected data about your interaction with our website, services or other aspects of our business. The information that is collected is not generally personally identifiable as it is aggregated data that does not usually identify any individual user.

Third party organisations may share user information they collect from our website with other analytics companies that collect, analyse and report on data obtained from their clients. In some cases, the non - personally identifiable information collected from our website or services may be linked with information collected by a third party source to become personally identifiable. We will not link or merge information collected by us with information collected by third party organisations without your consent. However, Google, Facebook or other third parties may merge or link your information if you have provided your consent for them to do that.

By using our website, call centre and services, you consent to:

- a) the collection of data by our ad servers or third party affiliates, or the transfer of information to them, wherever necessary, for optimisation and enhancement of our website and services and to tailor the content and advertising that is delivered to you; and
- b) receiving email or SMS communications from us. If you provide us with a false email or mobile number, we may be unable to provide you with the requested information or your quote summary, and personal information may be accessible to a third party. To safeguard personal information that may be accessible from communications from us, we recommend that you only provide us with contact details over which you maintain access and control.

You can opt out of marketing and advertisements at any time. If you ask us not to send you direct marketing communications, we will stop doing so within a reasonable period. The process for unsubscribing from our communications is set out below.

KEEPING YOUR PERSONAL INFORMATION SECURE

We generally store Personal Information on networks in Australia.

We will take reasonable precautions to ensure that the personal information that we have about you is protected against any unlawful use, unauthorised access, modification or disclosure and these precautions include:

- using appropriate information technology and processes;
- using computer and network security systems with appropriate firewalls, encryption technology and passwords for the protection of electronic files;
- securely destroying or “de-identifying” personal information if we no longer require it subject to our legal obligations to keep some information for certain prescribed periods;
- restricting access to your personal information to our employees and those who perform services for us who need your personal information to do what we have engaged them to do; and,

- requesting certain personal information from you when you wish to discuss any issues relating to the products and services we provide to you.

While we undertake reasonable steps to protect your personal information, no guarantee can be given that information sent over the internet is always 100% secure. Sending and receiving information over the internet is at the user's own risk, however we will take all reasonable steps to ensure your data security once we receive it.

If we become aware of a data breach involving your Personal Information that is likely to result in serious harm to you, we will notify you and the Office of the Australian Information Commissioner as required under the Notifiable Data Breaches scheme in Part IIIC of the Privacy Act. We may notify you electronically so that you can take steps to protect yourself from harm.

Where reasonably possible, we will destroy or de-identify your information if it is no longer required for the purpose for which it was collected or any related purpose (subject to any relevant record keeping obligations under Australian law).

Disclosure of Personal Information to overseas recipients

We may disclose or process Personal Information of our customers to overseas recipients. Where we engage with overseas entities for the provision of third-party services.

Before disclosing personal information overseas (including to the USA, EU, Philippines and Fiji), we take reasonable steps to ensure the recipient will handle the information in a way that is substantially similar to the APPs, including through contractual protections and due diligence. We will not send your personal information overseas unless one of the following applies: (a) we have taken reasonable steps to ensure the overseas recipient will handle your personal information in accordance with the APPs; (b) the overseas recipient is subject to a law or binding scheme substantially similar to the APPs and you can access mechanisms to enforce that law or scheme; (c) you have consented to the overseas disclosure after being expressly informed that we will not be taking reasonable steps to ensure the recipient complies with the APPs; or (d) the disclosure is required or authorised by Australian law or a court/tribunal order.

Please note that some of our participating suppliers may operate call centres that are based overseas, and so if you enquire about a product with them, you may call or be called by one of those call centres. If you provide information to a participating supplier, the collection, storage and use of that information will be managed by the participating supplier and subject to their privacy policy and their website terms of use.

WHEN WE DISCLOSE PERSONAL INFORMATION

We do not sell, license or otherwise disclose your Personal Information to third parties unless such disclosure is for the purposes set out in this Privacy Policy.

Participating suppliers

We may provide your information to participating suppliers to enable suppliers to provide products and services to you. This may include providing your information to a supplier:

- if you wish to obtain a quote for products or services (in some cases, your personal information will be relevant to calculating the cost of the products or services offered to you); and,
- if you decide to enter into an agreement with that supplier or wish to obtain further information.

Third party affiliates and service providers

We may provide your information to our third-party affiliates who carry out services on our behalf or to service providers to enable them to perform business functions for us. Whenever possible, we require such third parties to only collect and use Personal Information in accordance with this Privacy Policy,

and for no purpose other than providing us with our requested services. This may include service providers we engage to supply prizes to you on our behalf.

Co-branding

If you use a product or service that is co-branded or that is part of a joint promotion involving us and one or more third parties, your information may be collected by each party. Generally, we do not control the management or use of information by third parties. You should consult each respective privacy policy to confirm how each party will manage and use your information.

Legal requirements

We may disclose your information if we are required or authorised to do so by or under an Australian law or a court/tribunal order, or if such disclosure is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body. Where lawful and appropriate, we will notify you of such disclosures.

Change of ownership

If there is a change of control in respect of our company, your information may become accessible by a third party if we are required to transfer assets to them.

Interactive platforms

Any personal information that you submit, display or publish on an online platform or website, including social media, is publicly available and may be read, collected, used and disclosed by us or other users of those platforms subject to the terms of use of those sites. If you decide to interact with us via social media, your limited data from your social media profile may be collected and provided to us or other third parties.

ACCESS TO YOUR PERSONAL INFORMATION

You have the right to access and correct your personal information we hold. We will respond to your request for access within 30 days. In certain situations permitted by the Privacy Act (such as where access would pose a serious threat to life, health or safety, or would have an unreasonable impact on the privacy of others), we may deny access to some or all the personal information we hold. We will always provide reasons in writing if access is refused. We may charge you a reasonable fee for providing access to your personal information, but we will advise you of the fee before we process your request. We will give access in the manner requested if it is reasonable and practicable to do so. Please email or write to our Privacy Officer (see Contact Information) if you wish to access or correct your personal information.

If you ask us to correct your personal information and we agree that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct the information within 30 days. If we refuse to correct the information, we will give you a written notice explaining our reasons and how you can complain about our refusal. If we have previously disclosed the incorrect information to a third party, we will notify the third party of the correction (unless impracticable or unlawful to do so) upon your request.

If you provide us with information about another person, you must have that person's consent before you provide the information to us. You must also tell the person we have collected their personal information; the person is entitled to access the information we hold; and he or she should refer to this document to understand how we manage their personal information.

DATA DELETION OR UNSUBSCRIBE FROM MARKETING COMMUNICATIONS

If you no longer wish to receive marketing communications from Compare The Market or Compare The Meerkat, please use the unsubscribe link contained in all our email communications. If you use the

unsubscribe link in our email communications, you will be removed from the distribution list for email communications, but you may continue to receive communications from us by SMS or phone.

You can contact us by calling 1800 456 981 or email privacy@comparethemarket.com.au to opt out of all communications or request the deletion of your personal information or customer account.

HOME LOANS – VERIFICATION OF IDENTITY

If you complete a home loan application through us, we will be required to verify your identity, which we will do in accordance with specific Online Identity Verification Terms which we will present to you at the time that we are carrying out the verification. We will not use any of the identity verification information captured by us in that process for any reason not set out in those terms.

PRIVACY COMPLAINTS

If you have a complaint about the way we manage your personal information, including any decision made regarding a request for access or correction of your personal information, please contact our Privacy Officer (see Contact Information):

Our Privacy Officer will endeavour to resolve any privacy complaints within 30 days and will respond in writing to you regarding the outcome of any investigation. If your privacy concerns are not resolved satisfactorily or you wish to obtain more information on the privacy legislation, you can contact the Office of the Australian Information Commissioner (see Contact Information).

CONTACT INFORMATION

Privacy Officer:	Office of the Australian Information Commissioner:
Phone: 0482 637 311 Email: privacy@comparethemarket.com.au Level 17, 179 Turbot Street Brisbane City 4000	Phone: 1300 363 992 Email: enquiries@oaic.gov.au GPO Box 5218, Sydney NSW 2001 Website: www.oaic.gov.au/privacy