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## Privacy Policy

Swiftcompare is committed to protecting the privacy and personal information of customers. This Privacy Policy describes the practices and processes we have in place to manage and safeguard that information.

In this Privacy Policy, "we" and "us" refers to the entity providing the product or service as shown in the table below and "you" refers to an individual about whom we collect personal information.

Swiftcompare is required to comply with the *Privacy Act 1988* (Cth) and is bound by the Australian Privacy Principles (APPs) set out in that Act. The APPs establish minimum standards for the collection, use, disclosure and handling of personal information. They apply to personal information in any form, including electronic and digital form. The APPs can be accessed at the website of the office of the Australian Information Commissioner: [www.oaic.gov.au](http://www.oaic.gov.au)

SWIFTCOMPARE is also subject to other laws relating to the use of personal information. In certain circumstances, SWIFTCOMPARE may be subject to privacy obligations under the *Telecommunications Act 1997* (Cth). SWIFTCOMPARE's direct marketing activities must also comply with the *Do Not Call Register Act 2006* (Cth) and the *Spam Act 2010* (Cth). In this Privacy Policy, unless the context otherwise requires:

- **Privacy Law** refers to any legislative or other legal requirement that applies to SWIFTCOMPARE's collection, use, disclosure or handling of personal information.
- **Personal information** means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in material form or not. Personal information includes sensitive information.
- **Sensitive information** means personal information about an individual's racial or ethnic origin, political opinions or memberships, religious beliefs or affiliations, philosophical beliefs, professional or trade association/union memberships, sexual preferences and practices or criminal record.

### **Why does SWIFTCOMPARE collect personal information?**

SWIFTCOMPARE collects personal information in order to:

- to allow you to compare products and/or obtain quotes for products or make enquiries;
- to send you a summary of your quote and comparison results;
- to 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;
- to reconcile transactions with our business partners or participating suppliers that supply you products because of our services;

SWIFTCOMPARE needs to be able to collect personal information for most of its business activities, although the information we require depends on the particular circumstances.

### **What personal information does SWIFTCOMPARE collect?**

SWIFTCOMPARE collects or holds personal information about individuals who are:

- **Prospective customers.** This includes people who indicate to us that they are interested in our products and services or who we think may be interested in our products and services as well as people who have expressed interest in obtaining or learning more about those products and services.
- **Current customers.** This includes people who purchase a product or service from SWIFTCOMPARE.
- **Past customers.** These are people who have purchased products or services from any of the SWIFTCOMPARE related entities but do not currently hold any active accounts with SWIFTCOMPARE.

### **Can you deal with SWIFTCOMPARE without identifying yourself?**

In some limited situations customers and other individuals may be able to deal with SWIFTCOMPARE anonymously or using a pseudonym. However, if you do not wish to be identified we may not be able to provide the information or assistance you require.

### **What personal information does SWIFTCOMPARE usually collect?**

SWIFTCOMPARE collects a wide range of personal information about its customers, but the type and amount of information collected depends on the particular business context. However, SWIFTCOMPARE seeks at all times to ensure that it only collects the personal information that is necessary for the purposes of its business activities.

SWIFTCOMPARE needs to collect basic identifying and contact information for all customers, including from prospective customers. This will usually include name, date of birth, email address, telephone number(s) and residential address.

There is always a risk in sending and receiving information over the internet, but once we have received your personal information, we'll take reasonable steps to make sure it is protected and secure.

### **How does SWIFTCOMPARE collect personal information?**

We collect information about prospective customers directly over the internet when enquiries are made.

### **SWIFTCOMPARE's use and disclosure of personal information**

Where SWIFTCOMPARE collects personal information for a particular purpose, it may use and disclose the information for that purpose or another purpose that is related to that purpose (or that is directly related to that purpose in the case of sensitive information). For example:

- Personal information collected from you for the purpose of establishing or managing an account may be used and disclosed for related purposes such as supplying this information to SWIFTCOMPARE related entities for identity verification, credit checking, assessing entitlement to concessions, supplying and servicing a product, connecting and administering a service, billing and collection in relation to the service and investigating and rectifying complaints or faults.

SWIFTCOMPARE will not use personal information about prospective, current and past customers for the purpose of direct marketing other than for the purpose of life insurance comparisons.

SWIFTCOMPARE will not disclose personal information about customers to third parties other than the insurance company. Personal information may only be disclosed to the relevant industry Ombudsman (for complaint management purposes) or relevant Government regulator in its servicing of regulatory obligations.

SWIFTCOMPARE may also disclose personal information as authorised by privacy law for a range of other purposes, including:

- where necessary to prevent or lessen a serious threat to health or safety;
- for law enforcement or crime prevention purposes;
- for the investigation of unlawful activity;
- for location of missing persons; and
- for use in legal proceedings or dispute resolution.

In situations other than those described above, SWIFTCOMPARE will not disclose personal information without the customer's consent (although consent may be implied).

If we disclose your personal information to our business partners or participating suppliers, they will use, deal with and manage your personal information in accordance with their privacy policies. We will never sell or rent your personal information to external companies other than our business partners and participating suppliers.

### **Is personal information disclosed outside Australia?**

Our advice partners are located only in Australia and we will not disclose your personal information outside Australia.

## **How does SWIFTCOMPARE protect your personal information?**

SWIFTCOMPARE recognises the importance of protecting your personal information and of ensuring that it is complete, accurate, up-to-date and relevant. We will take reasonable steps to ensure this occurs. If you believe that your personal information is not accurate, complete or up to date, please contact us. You will not be charged for accessing your information, although we might have to charge the reasonable cost of processing your request, including photocopying, administration and postage.

## **Can you access or correct personal information SWIFTCOMPARE holds about you?**

You have a right to access personal information we hold about you. If your request is particularly complex or requires detailed searching of our records, there may be a cost to you in order for us to provide you with this information.

If you believe there are errors in the information we hold about you, you have a right to ask us to correct the information.

However, we are not required to provide access where we believe doing so would:

- prejudice law enforcement or crime prevention activities;
- pose a serious threat to health or safety;
- have an unreasonable impact on the privacy of other individuals;
- prejudice SWIFTCOMPARE in legal proceedings or negotiations with you;
- reveal information connected with a commercially sensitive decision making process; or
- be contrary to law.

If you wish to have access to information SWIFTCOMPARE holds about you, you should contact us by emailing us on [help@swiftcompare.com.au](mailto:help@swiftcompare.com.au)

## **Dealing with SWIFTCOMPARE on-line**

We collect personal information about the other websites that are visited by computers that are used to visit our website. This information may be aggregated to provide us with information about the types of webpages and websites, or particular webpages and websites, visited by computers that use our site. We may store the Internet Protocol (IP) address of your computer when you visit our website.

## **How to opt out**

If you no longer want to receive communications from us that are non-account related or legally required, you may request to opt-out from receiving such marketing communication by emailing us on [help@swiftcompare.com.au](mailto:help@swiftcompare.com.au). We will not charge you for any request to opt-out and will process your request in accordance with our legal obligations.

## **Complaints and further information**

If you believe your privacy has been interfered with and wish to make a complaint, please contact us at [help@swiftcompare.com.au](mailto:help@swiftcompare.com.au). We will investigate your complaint and notify you of the outcome.

If you are dissatisfied with the outcome of your complaint, or you do not receive a response to your complaint within 30 days, you may make a complaint to the Office of the Australian Information Commissioner (OAIC). Complaints to the OAIC must be made in writing. Where possible, complaints to the OAIC should be made through the online Privacy Complaint form, available at [www.oaic.gov.au/privacy/making-a-privacy-complaint](http://www.oaic.gov.au/privacy/making-a-privacy-complaint).

*Dated April 2020*