



VISION RE PARTNERS
ACCELERATING YOUR VISION

PRIVACY POLICY

As at 19 April 2024

Vision Re Partners Pty Ltd ACN 637 403 109

1. PURPOSE OF THIS POLICY

This Privacy Policy applies to the collection, use, disclosure and handling of personal information by Vision Re Partners Pty Ltd ACN 637 403 109 and its associated entities, including Vision Advisore Pty Ltd ACN 649 154 487 and Vision Re Partnerships Pty Ltd ACN 656 284 463 (collectively **Vision, we, us** or **our**) including personal information collected via our website available at www.visionrecap.com and any of its regional or other domains or properties, and includes any related service, tool or application, specifically including mobile web, any iOS application and any Android application, or other access mechanism (**Vision RECap Site**).

This Privacy Policy is designed to tell you what will happen to the information you provide through the Vision RECap Site or through any other form of communication with us, our associates, our wholly owned subsidiaries or contractors. Please be sure to read this entire Privacy Policy before using the Vision RECap Site or submitting personal information to us.

Vision is committed to protecting the privacy of individuals and is bound by the Australian Privacy Principles set out in the *Privacy Act 1988 (Cth) (Act)*. We will only collect, use or disclose personal information in accordance with the Act and this Privacy Policy.

2. PERSONAL INFORMATION

This Privacy Policy concerns any personal information or sensitive information of yours which is provided to us.

Personal information is any information about an identified individual or an individual who is reasonably identifiable, whether the information is true or not and whether the information is recorded in a material form or not.

Sensitive information is any personal information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health, genetics, biometrics or biometric templates.

We generally do not wish to be informed of a person's sensitive information. We, in any event, will collect, use or disclose sensitive information about you only as allowed by law, for example where we have received your consent to do so or the collection is required by law.

3. CONSENT

By using the Vision RECap Site or otherwise providing us directly, or through others, with your personal information, you agree with the terms of this Privacy Policy and consent to the collection, use, and disclosure of that information in accordance with this Privacy Policy, the Act as amended (including the Australian Privacy Principles) and other applicable privacy laws.

4. COLLECTION OF PERSONAL INFORMATION

We collect personal information that is necessary for our business activities and in order to provide and develop our services. We may do this in a number of ways, including:

- (a) directly from individuals, when you provide it to us (including through your use of the Vision RECap Site) or our agents or contractors (including verbally or through email communication);
- (b) when you complete any forms, applications or use any 'contact us' pages on our Sites;
- (c) from publicly available resources;
- (d) by analysing records of your use of our services and Sites; or
- (e) through other methods for collecting information.

4.1. Collection under the law

We may also collect your personal information when legally required to do so under law. For example, where we provide you with certain services, we may be required to collect additional personal and sensitive information under the *Income Tax Assessment Act 1936 (Cth)*, *Insurance Contracts Act 1984 (Cth)* and *Anti Money Laundering and Counter Terrorism Financing Act 2006 (Cth)*.

4.2 PASSIVE INFORMATION COLLECTION

As you navigate through the Vision RECap Site, certain information can be passively collected (that is, gathered without you actively providing the information) through various technologies, such as cookies, internet tags or web beacons and navigational data collection.

The Vision RECap Site may use and combine such passively collected anonymous information to provide better services to website visitors, customise the website based on your preferences, compile and analyse statistics and trends and otherwise administer and improve the website for your use. Such information is not combined with personally identifiable information collected elsewhere on the Vision RECap Site unless you have consented.

5. TYPE OF INFORMATION COLLECTED AND WHY

The type of personal information we collect may include (but is not limited to), your name, date of birth, address, postcode, telephone numbers, email address and information on usage and preferences regarding Vision's products and services.

We may also collect personal information about you for the purposes of verifying your identity. This may be done through requesting a copy of any identification documentation such as your drivers' licence, passport or other means of identification or background checks.

We may also collect information about assets that you nominate through the Vision RECap Site. This information may include details of the nature and life of the asset, its condition and any additional information that could impact the risk, insurability or value of an asset. As part of this process, we may be required to share this information with third parties for reporting, operational and insurance related purposes.

If we are not able to collect personal information about you we may not be able to provide you with products, services and assistance to the extent that they require us to collect, use or disclose personal information.

The personal information you provide us may be used for a number of purposes connected with its business operations, which include to:

- (a) verify identity;
- (b) facilitate the provision of products and services;
- (c) address or respond to any requests;
- (d) inform customers of existing and proposed products and services;
- (e) better understand customer needs;
- (f) identifying individuals or companies responsible for workflows or tasks;
- (g) develop and improve the quality and scope of the products and services Vision provides; and
- (h) seek feedback.

5.1 USING INFORMATION FOR DIRECT MARKETING

Your personal information may be used so that we, our associates, our subsidiaries, agents and contractors can provide you with information about our products and services, such as by way of direct mail or telemarketing, and, where you have opted in, by email, SMS and MMS, or to request your feedback for promotional purposes. If you wish to opt-out of receiving such information, please email us at hello@visionrecap.com.

5.2 OTHER PURPOSES OF COLLECTION

We may also use your personal information for purposes related to those described above which would reasonably be expected by you.

We will not use your information for purposes other than those described above unless we have your consent or as permitted by law (including for law enforcement or public health and safety reasons).

5.3 WHEN WILL YOUR INFORMATION BE SHARED

We may disclose your personal information in certain circumstances, such as where we are required or authorised by law or where you have consented to us doing so.

We also may disclose your personal information to:

- (a) current or potential insurers and their associated third parties for insurance related purposes including but not limited to obtaining policy quotes, reporting incidents, risks, claims, asset information, permits, professional services or associated contractor works;
- (b) others in accordance with a request made by an individual or company;
- (c) related companies and business partners; and
- (d) persons engaged in providing us with professional, business, technology and corporate services, when reasonably required.

Unless you consent, we otherwise will not disclose your personal information to third parties.

5.4 SHARING INFORMATION OUTSIDE AUSTRALIA

We will only send your personal information outside Australia:

- (a) if authorised to do so by law;
- (b) for any of the purposes set out in this Privacy Policy (but only to parties that are subject to obligations in relation to personal information no less onerous than those in this Privacy Policy); or
- (c) if consent is given to us doing so, including where you approve the disclosure of your personal information to overseas parties such as insurers and advisers.

In the course of Vision's ordinary business operations Vision does not disclose personal information to offshore third parties, however Vision uses a cloud-based software system to store your personal information, and as a result some of your information may be held overseas.

Where you have consented to us disclosing your personal information to a third party, you should review that third party's privacy policies. We are not able to control or monitor how third parties use your personal information.

6. ACCESS AND CORRECTION OF INFORMATION

You may request access to any of the personal information we hold about you by contacting us as specified below.

We will take all reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date. To ensure your personal information is accurate, please notify us of any errors or changes to your personal information and we will take appropriate steps to update or correct such information in our possession.

7. STORAGE AND SECURITY OF INFORMATION

We will take all reasonable precautions to safeguard information from loss, misuse, unauthorised access, modification, disclosure or destruction.

We may store your files electronically and retain copies of your files for up to three (3) years for any historical asset data and up to seven (7) years for any claims and or incident data. We implement a range of physical and electronic security measures to protect the personal information that is held, including use of passwords, firewalls and other electronic security measures as well as physical security devices.

You should keep in mind that no internet transmission is ever completely secure or error-free. In particular, e-mails sent to or from our Site may not be secure.

8. NOTIFICATION

8.1 SMS NOTIFICATION

If you provide your mobile number, you consent to us using that information to contact you for administration purposes or in the event of any major incidents related to an asset, including but not limited to natural disaster, fire, flood, death, serious injury or act of terrorism.

8.2 NOTIFIABLE DATA BREACH SCHEME

In the event of any loss or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, we will:

- (a) investigate; and
- (b) notify you and the Australian Information Commissioner as soon as practicable, in accordance with the Act.

9. COMPLAINTS

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe we have not complied with this Privacy Policy or the Act, please contact us as set out below. A representative from Vision will investigate the complaint and determine whether a breach has occurred and what action, if any, to take.

Vision will take any privacy complaint seriously and will aim to resolve any such complaint in a timely and efficient manner (Vision has a target response time of 30 days).

Vision expects our procedures will deal fairly and promptly with any complaints. However, if any person remains dissatisfied, they can also make a formal complaint with the Officer of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia):

Office of the Australian Information Commissioner (OAIC)

Complaints must be made in writing

Director of Compliance
Office of the Australian
Information Commissioner
GPO Box 5218
Sydney NSW 2001
[1300 363 992](tel:1300363992)
www.oaic.gov.au

10. LINKS TO OTHER WEBSITES

The Vision RECap Site may contain links or references to other websites to which this Privacy Policy may not apply. You should check their own privacy policies before providing your personal information.

11. CHANGES TO THIS POLICY

The date of this Privacy Policy is set out at the beginning of this policy. We may change this Privacy Policy at our discretion by posting a new version of this Privacy Policy on any of our websites. Where our changes are material, we will attempt to notify you by way of email to bring these material changes to your attention. We may not notify you if the way in which we use your personal information has not changed, or otherwise where the changes are not material.

By continuing to use the Vision RECap Site, or otherwise continuing to deal with us, you accept this Privacy Policy as it applies from time to time.

12. CONTACT US

If anyone wishes to exercise a right to opt-out of receiving our marketing materials, or if any person has any questions or concerns about this Privacy Policy, privacy issues or queries or our information practices, please contact us at: hello@visionrecap.com.