



Privacy policy

Date of preparation: 1 October 2022

About this Policy

We at MLC Limited (**MLC Life Insurance**) are committed to protecting your personal information. As a provider of life insurance services, respectful and appropriate use of personal information is critical to our business.

This Privacy Policy sets out general information about how we manage your personal information and how you can contact us about this Privacy Policy or your personal information that we hold.

In this Privacy Policy, **MLC Life Insurance, we, us** and **our** means MLC Limited (ABN 90 000 000 402).

Types of personal information we collect and hold

We collect and hold a range of personal information about our customers, business partners, and people.

The kinds of personal information that we may collect, and hold includes:

- name, contact details (including address, email, phone number and social media handles), date of birth and gender
- information about your interactions with us including complaints
- personal information which is required to acquire a product or service from us and as may be needed during the lifecycle of that product or service
- information required to underwrite an application for an insurance product or assess and manage an insurance claim, including previous insurance records and claims history, medical and other health records, information about beneficiaries and nominated representatives, employment, and income

- financial details such as your tax file number and bank account details, super or other insurance policy information
- sensitive information (see 'Sensitive Information' section below)
- if you are a business partner, information about your business relationship with us
- information relating to your use of our online services (see the 'Online services' section below), and
- any other information we think is necessary for you or others to acquire our products or for us (or our service providers or representatives) to provide services or fulfil our obligations to you.

Sensitive information

Sometimes we need to collect and hold sensitive information about you, for example when you are applying for an insurance product or when we are assessing a claim made by you for a benefit under your insurance product. This will generally include information about your health, activities that may impact your health, your health history, fitness and physical activities. We may also give you the ability to provide your voiceprint to identify yourself to our call centres.

Sensitive information is information about a person's health (this can include genetic or biometric information), racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information.

We only collect and hold sensitive information with your consent or in other limited situations which the law allows.

How we collect personal information

We often collect personal information when you engage with us directly. For example, we might collect your personal information when you fill out a form with us, call us, meet with one of our representatives or use our website. See the 'Online services' section below for more information about our collection of personal information online.

Sometimes we collect information about you from other sources that may include:

- medical practitioners or medical facilities
- our representatives and distributors, insurance brokers, referrers, other insurers and reinsurers
- your relatives, representatives and financial adviser
- your employer
- the trustee of your super fund when you hold insurance through a super fund
- your bank or other financial institution when you hold consumer credit insurance
- third parties who assist in the administration of our products
- service providers such as information brokers, investigators, lawyers, financial advisers and their support staff, doctors and other medical and occupational experts
- credit reporting agencies or information providers

- social media platforms (eg if you log in for our services using your social media profile)
- devices (including wearable devices) in relation to which you agree to provide personal information to us, and
- external dispute resolution bodies, and public sources, including statutory or government organisations, and public registers.

If you provide us with personal information about another person, you should obtain their consent to do so, having informed them of this Privacy Policy where appropriate.

Why we collect personal information

We may collect, hold, use and disclose your personal information to:

- provide you with the products and services you've asked for or under which you may receive cover or benefits (eg group insurances) or other products and services
- process and underwrite your application (including deciding whether or not to provide cover) or determine your eligibility under group insurances
- administer products and services which includes calculating your insurance premiums, answering your requests and managing complaints and disputes, managing claims and making payments, varying products and services, conducting market research, taking legal action relating to our products and services and managing our relevant product portfolios
- enable information about our products and related products and services to be made available through online services provided by us or the organisations to which we disclose your personal information

- develop and improve our products and services
- assist us in running our business including performing administrative and operational tasks (such as training and managing staff, risk management, planning, research and statistical analysis, and systems development and testing), and
- prevent or investigate any fraud or crime, or any suspected fraud or crime.

We may also collect, hold, use and disclose your personal information:

- as required by legislation or codes that are binding on us
- for any purpose for which you have given your consent, and
- to combine the information that we hold about you with information about you collected from or held by external sources to enable the development of consumer insights about you so that we can better serve you. We may also use external parties to undertake the process of creating these insights.

What if you don't want to provide us with your personal information?

If you don't provide your personal information to us, we may not be able to:

- provide you with the product or service you want
- manage or administer your product or service
- determine your eligibility for a benefit payment
- personalise your experience with us
- verify your identity or protect against fraud, or
- let you know about other products or services that might better meet your needs.

Direct marketing and how to opt out

Unless you opt out we may, to the extent permitted by law:

- use or disclose your personal information to let you know about products and services that we believe may be of interest to you
- market our products to you through third party channels (such as social networking sites), or via other companies who assist us to market our products and services
- conduct these marketing activities via email, telephone, SMS, Instant Messaging, mail, or any other electronic or other means, including targeted advertising through MLC Life Insurance or non-MLC Life Insurance websites
- disclose your personal information to our related companies or to our trusted partners so they can tell you about their products and services
- disclose your personal information to companies outside MLC Life Insurance who assist us to market our products and services to you, and
- disclose your personal information to third parties such as brokers or agents, or for the purpose of connecting you with other businesses or customers.

You can let us know at any time (see 'Contact Us') if you wish to opt out of receiving direct marketing communications from us and, we will process your request as soon as practicable.

You can also opt out by following the instructions in particular direct marketing communications you receive.

Disclosure of personal information

To make sure we can meet your specific needs and for the purposes described in 'Why we collect personal information', we may disclose your personal information to other third parties, including:

- our parent company, Nippon Life Insurance Company (Nippon) and our other related bodies corporate
- those involved in providing, managing or administering any aspect of your product or service or any product (eg group insurance) under which you receive or may receive benefits
- service providers such as information brokers, investigators, lawyers, financial advisers and their support staff, doctors and other medical and occupational experts
- representatives of MLC Life Insurance or other parties who sell our products or services
- super and managed funds organisations, and their advisers and service providers
- if your insurance is held in a super product, to entities (and their representatives or service providers) involved in issuing, maintaining and providing administration support relating to these products
- medical professionals, medical facilities or health authorities who verify any health information you may provide
- reinsurers, claim assessors and investigators
- brokers or referrers who refer your application or business to us
- in accordance with instructions from your nominated financial adviser
- organisations we sponsor and loyalty program partners, including organisations we have an arrangement with to jointly offer products or have an alliance with to share information for marketing purposes

- police and other enforcement bodies and government agencies where we are required or authorised by law to help detect and prevent illegal activities
- other government or regulatory bodies (including the Australian Securities and Investment Commission, the Australian Prudential Regulatory Authority, AUSTRAC and the Australian Tax Office) as requested or as required or authorised by law (in some instances these bodies may share it with relevant foreign authorities)
- media or social networking sites that provide us with opportunities to place messages in front of you
- service providers that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems
- joint venture partners that conduct business with us
- organisations that assist with our product planning, analytics, research and development
- mailing houses and telemarketing agencies and media organisations who assist us to communicate with you
- other organisations involved in our normal business practices, including our agents and contractors, as well as our accountants, auditors or lawyers and other external advisers, and
- where you have given your consent.

Depending on the product or service we provide to you, we may disclose your personal information to organisations outside Australia, in countries such as France, Germany, Hong Kong, India, Italy, Japan, New Zealand, the Philippines, Singapore, South Korea, Switzerland, UK and USA.

We may store your information in cloud or various other types of remote, networked, or electronic storage. As electronic or networked storage can be

accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

MLC Life Insurance Staff

We are committed to protecting your privacy as an employee in line with the MLC Life Insurance Employee Privacy Policy. A copy of the Employee Privacy Policy is available to employees on the MLC Life Insurance intranet site.

Job Applicants

If you are applying for a job at MLC Life Insurance, or you are a prospective candidate or referee for a job applicant, we may collect your personal information for recruitment purposes including to assess your suitability for a current or future employment or contractor position.

If we don't obtain the personal information, we are seeking from you we may not be able to process your application for a role or let you know of new career opportunities in your field of experience.

We may collect your information from, and/or disclose your information to, other organisations for any purposes for which we use your information. Where your personal information is disclosed, we will seek to ensure that the information is held, used or disclosed consistently with the Privacy Act and any other applicable privacy laws and codes.

The types of organisation we may disclose your information to include:

- those involved in managing, validating or administering your application, employment or engagement such as third-party suppliers, our related bodies corporate, organisations providing education and training or psychometric testing, organisations providing video-interviewing services, professional associations, printers, posting services and our advisers;
- employment agencies, referees, counselors and assessment agencies;
- organisations that conduct background checks or monitor employee conduct;
- academic institutions, health service providers, law enforcement agencies and your current, previous and prospective employers;
- organisations involved in maintaining, reviewing and developing our business systems, procedures and infrastructure including testing or upgrading our computer systems; and
- those involved in a corporate re-organisation or a transfer of all or part of the assets or business of MLC Life Insurance.

We may also disclose your information:

- to your representatives including your legal advisers;
- as required or authorised by law, for example, to government or regulatory bodies (in some instances these regulatory bodies may be overseas); and
- where you have given your consent.

Online services

When you use our websites at mlcinsurance.com.au and vivowellbeing.com.au, our Customer or Adviser Portal, LifeView digital platform, mobile applications, email communications, social media profiles and other online

services (together, 'Online Services'), we may collect information about your location or activity including information accessed, IP address, telephone number, device identifiers, social media profile information and whether you've accessed third party sites. We do this to verify you, identify ways we can improve our services for you, maintain the continuity of your online sessions, recall your details and preferences, understand you better, and for the other purposes described in this policy.

Some of the information is collected using cookies. A cookie is a piece of information that allows our system to identify and interact more effectively with your browser. The cookie helps us to maintain the continuity of your browsing session and remember your details and preferences when you return. You can configure your web browser software to reject cookies however some parts of our Online Services may not have full functionality if you do. See allaboutcookies.org for instructions on deleting and rejecting cookies for many common browsers.

We also collect de-personalised information from the online interactions of customers that use our Online Services. Much of this data collection is done through the use of cookies and is used to improve our services and enhance customers' online experience with us (eg website statistics) and does not identify individual customers but does identify internet browser. Where we do identify you (such as where customers are logged onto our online services), we treat any use or disclosure in accordance with this policy.

Some of our Online Services may allow you to submit content (such as feedback and comments on our services) for public sharing. If you choose to do this, your content may be viewed by other users of the Online Services and may be stored and disseminated on an ongoing basis by search engines and other third parties, even after you remove the content or set

it to "private". We may use your content submitted for publication for promotional purposes or any other purpose.

Third parties may collect personal information about your online activities over time and across different online services, including our Online Services. In some cases, we may allow third parties to collect information (which may include personal information) through our Online Services, eg through embedded content, embedded videos, embedded social network buttons or automated advertising technology. Some of these third parties may combine the information they collect with other information that they have collected about you from other online services. All such third-party providers' handling of the information is subject to their own privacy policies, terms and practices and is not covered by this policy. For example, our Online Services may use Google services such as Google Analytics and Google Maps from time to time. For more about how Google collects and processes data, please see Google's privacy policy and their information at google.com/policies/privacy/partners

Storage and security of personal information

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure, including control of access to our buildings and electronic security systems, such as firewalls and data encryption on our websites.

We may store personal information physically or electronically with third party data storage providers or our service providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate steps to protect that information and restrict the uses to which they can put that information.

Your privacy rights

Accessing your personal information

You can access your personal information that we hold on request, subject to any legal restrictions or exemptions.

To request access to your personal information, please contact our Privacy Officer (see 'Contact Us' below). We may charge you a small fee to cover our costs when giving you access, but we'll always check with you first.

If we decline your request for access, we will tell you why in writing. If you have concerns, you may complain. See 'Making a privacy complaint' below.

Updating your personal information

Please contact us if your details have changed or if you think there is something incorrect with the information, we hold about you.

We'll try to accommodate your updating of information requests where we can. If we can't, then we'll let you know in writing. If you disagree, you may ask us to make a note of your requested correction with the information.

Reviews and updates to this policy

MLC Life Insurance may review and, if necessary, update this Privacy Policy. If we do so, we will publish an amended Privacy Policy on our website. Changes may be made for reasons including, but not limited to the following:

- we make significant changes to our business processes which are not covered by this Privacy Policy
- there are significant changes to privacy legislation, and/or

- there are significant changes to our information handling practices, for example, due to technological advances.

This Privacy Policy supersedes and replaces all previous Privacy Policies and/or privacy summaries that you may receive or access. This Privacy Policy is also available upon request by contacting us.

Contact us for general inquiries or to obtain copies of records or this Privacy Policy

Call us on 13 65 25

8:30am to 6pm (AEST/AEDT)

Monday to Friday

Outside of Australia? You can call us on

+612 9121 6500

Email us

Attention: Privacy Officer

enquiries.retail@mlcinsurance.com.au

Write to us

Attention: Privacy Officer

MLC Life Insurance

PO Box 23455

Docklands VIC 3008

Making a privacy complaint

If you have a concern or complaint about your privacy we'd like an opportunity to put it right.

Please call us on **13 65 25** (Toll free **1800 062 061**) or for international calls **+61 2 9121 6500** (charges apply) between 8.30 am and 6 pm (AEST/AEDT), Monday to Friday to discuss your concerns with us. For hearing impaired customers, please call **1300 555 727**. For customers requiring interpreting or translation services, please call **131 450**.

If we are unable to resolve your concerns to your satisfaction, we will put you in contact with our Internal Complaints Resolution Team or you can write to:

The Complaint Manager
MLC Life Insurance Resolve
PO Box 23501
Docklands VIC 3008,

or alternatively send your concerns to **resolve@mlcinsurance.com.au**

For more information, please visit **mlcinsurance.com.au/support/customer/complaint**

If we haven't responded to your complaint within 30 days or you're not satisfied with the resolution provided by our Internal Complaints Resolution Team, then you can lodge a complaint with:

The Australian Financial Complaints Authority (AFCA)
GPO Box 3
Melbourne VIC 3001
Email: info@afca.org.au
Phone: 1800 931 678 (free call)

Or

The Office of the Australian Information Commissioner at **oaic.gov.au/privacy/privacy-complaints** or by calling **1300 363 992**.