



# General Insurance Privacy Notice from CommBank

## 1. About this Privacy Notice

This Privacy Notice explains how and why the Commonwealth Bank of Australia (ABN 48 123 123 124, AFSL 234945) (**CommBank**) and its subsidiaries (collectively, **CommBank Group, we, us**) collects, holds, uses, and shares personal information in relation to car and home insurance products provided by Hollard Insurance Partners Limited (ABN 96 067 524 216, AFSL 235030) (**Hollard**). Hollard is the issuer and underwriter of those insurance products.

## 2. Importance of providing accurate information

If we ask for your personal information and you don't provide it to us, or the information you provide us is inaccurate or incomplete, we may not be able to provide you with products or services that you are requesting, such as helping you to obtain a quote or complete an application for insurance.

In addition, if you do not provide accurate and complete information in connection with your insurance, you may not meet your responsibility not to make a misrepresentation to Hollard under the *Insurance Contracts Act 1984* (Cth). That could result in Hollard being unable to provide you with products and services, and it may affect your eligibility when making a claim.

## 3. What types of personal information we collect

Type of Information	What kinds of personal information might be involved
<b>Identity and contact details</b>	This may include your name, address, email address, phone number, and date of birth.
<b>Insurance Information</b>	Information in connection with your application or your policy, such as: <ul style="list-style-type: none"><li>• the risk you would like to insure; and</li><li>• premiums, claims, complaints, queries or feedback, including their status, scope, progress, and value.</li></ul>
<b>Customer insights</b>	We may combine the data that we hold about you to get a more integrated view of you as a CommBank Group customer. This includes combining your information from internal and external sources (for example, about other products you hold provided by the CommBank Group or our referral partners, or census or Australian Bureau of Statistics data). We may analyse this data to generate data insights which we may use for the purposes described in 'How we use your personal information'.

Type of Information	What kinds of personal information might be involved
<b>Behavioural information</b>	Information we generate about how you use our products, services, and digital platforms.
<b>Interactions including call recordings</b>	We may monitor and record calls and other interactions with us, like when you visit a branch, or use web chat, the CommBank app or NetBank. We will let you know if we are doing this.
<b>Sensitive information</b>	There may be times where the information we collect to support you will be sensitive information under privacy laws. The types of sensitive information we collect may include: <ul style="list-style-type: none"> <li>• health and other medical information; and</li> <li>• criminal history.</li> </ul>
<b>Information about your personal circumstances and relevant information about other policyholders</b>	Such as other owners of the car or home you wish to insure.

#### 4. How we collect personal information

We collect information directly from you most of the time, such as when you contact us to provide a product or service via our digital channels, our branch network, or call centres. We may also collect information from Hollard, in particular insurance information described in section 3.

There may also be times where we collect information about you from third parties, such as:

Type of Information	Examples of third parties
<b>Third parties acting on your behalf or on our behalf</b>	<ul style="list-style-type: none"> <li>• A solicitor, executor, administrator, attorney, guardian, or trustee</li> <li>• Third party service providers who capture data on our behalf</li> </ul>
<b>Publicly available sources</b>	This may include social media platforms, particularly if you use it to make a complaint.

#### 5. How we use personal information

We use your personal information to develop an integrated view of you as a CommBank Group customer, and to work with Hollard to develop and deliver general insurance products and services. Examples of the activities we may undertake are set out below.

Purpose	What use cases this might involve
<b>Serve you as a customer</b>	We use information to provide products and services to you, including to: <ul style="list-style-type: none"> <li>• manage our relationship with you;</li> <li>• support you with your applications, claims lodgement, and requests while you hold a policy;</li> <li>• respond to complaints or other service inquiries; and</li> <li>• contact you to tell you about something important.</li> </ul>

<b>Purpose</b>	<b>What use cases this might involve</b>
<b>Improve your customer experience and our products and services</b>	<p>We use your information to improve the way we and Hollard provide products and services. For example, we may:</p> <ul style="list-style-type: none"> <li>• work with Hollard to design, price, provide, optimise, and improve products, services, and digital features;</li> <li>• personalise the way content, services, and offers are presented or delivered to you;</li> <li>• integrate your insurance policy with CommBank Group banking products and services; and</li> <li>• review customer feedback, interactions, and how digital features are being used.</li> </ul>
<b>Perform Analytics Activities</b>	<p>We may develop customer insights as set out in the 'What type of personal information we collect' section of this notice. We may use and share those insights with Hollard to support the activities that we and Hollard undertake.</p>
<b>Manage risk</b>	<p>Such as to:</p> <ul style="list-style-type: none"> <li>• support the management of our information security and network controls;</li> <li>• monitor and review call recordings, online chats and other business activity for quality assurance, training and compliance purposes</li> <li>• comply with our legal obligations; and</li> <li>• manage regulatory risk, validate information provided to us, and detect, prevent, and investigate suspicious or fraudulent activity.</li> </ul>

## 6. Disclosure

The information we hold about you may be disclosed directly to Hollard for the purposes set out in this Privacy Notice in section 5 above. We may also share your information with other third parties, including:

<b>Who we share information with</b>	<b>Examples of who those third parties might be</b>
<b>Other policyholders or third parties entitled to cover or benefits under your policy</b>	Another person named on your insurance policy
<b>Your Authorised Representatives</b>	Solicitor, executor, administrator, attorney, guardian or trustee
<b>External Service Providers</b>	We may share your information with our external service providers, for instance, providers of certain outsourced functions such as technology, mailing, and legal services, auditors, and accountants.
<b>Dispute resolution service providers</b>	External dispute resolution schemes or mediators
<b>Government and law enforcement agencies</b>	We may share your information with regulatory bodies, government agencies and law enforcement bodies to comply with our obligations

## 7. Marketing

From time to time, we may also use your personal information to tell you about products and services that you might be interested in, including offers from our business and referral partners, but we will stop if you tell us to.

We may contact you by various means, including by mail, telephone, email, SMS, push or in app notification, or other electronic means, such as through social media, targeted advertising, through CommBank Group websites.

If you do not want to receive direct marketing offers from us, you can opt-out by following the instructions provided in the marketing message.

## 8. Overseas Disclosure

From time to time we may send personal information to service providers or other third parties who operate or hold data outside of Australia. Where we send information overseas, we make sure that appropriate data handling and security arrangements are in place.

Australian law may not apply to some of these entities. We may also send information overseas to complete a particular transaction or where this is required by the laws and regulations of Australia or another country.

## 9. CommBank provision of transitional services to Hollard

The home and car insurance products provided by Hollard, are provided by a company that used to be named Commonwealth Insurance Limited (CIL). Ownership of CIL was transferred to Hollard Australia in October 2022, and CIL was renamed to Hollard Insurance Partners Limited. To support the change in ownership, a number of IT systems and services will be provided by CommBank to Hollard for a transitional period until Hollard can migrate to separate infrastructure and operations under its new ownership.

During the transitional period, personal information held by Hollard may continue to be hosted and accessed by Hollard within the CommBank IT environment. Hollard will have limited access for the purposes of providing its products and services to you.

## 10. Further information, including how to access and update your information or lodge a complaint

Go to [commbank.com.au/privacy](https://commbank.com.au/privacy) for our Privacy Statement or ask for a copy at any branch. It tells you:

- More about how we collect, use, store and share your personal information;
- How to access your information (under "Accessing your Information") and correct it if it's wrong;
- How to update your preferences about how we contact you or ask not to receive direct marketing; and
- How to make a privacy-related complaint (including about our compliance with the Australian Privacy Principles) and how we'll deal with it.