



Hospitality  
Industry  
Insurance

# HOSPITALITY INDUSTRY INSURANCE PRIVACY POLICY

we help people get their lives back



# 1. INTRODUCTION

Hospitality Industry Insurance ('**HII**') is a specialised insurer referred to in this Privacy Policy as HII, us or we. We are a joint venture owned by Employers Mutual Limited (EML) and our industry partners Australian Hotels Association NSW Holdings Pty Ltd and ClubsNSW Insurance Holdings Pty Ltd. Hospitality Industry Insurance cares about the privacy and security of your personal information and are committed to comply with the Privacy Act 1988 (Cth) (the Act).

References to Corporate Grouping in this Privacy Policy (Policy) mean companies that HII is in a grouping with and Mutual Management Pty Ltd, Employers Mutual Limited and their respective related bodies corporate, subsidiaries and associated entities (these terms when used in this Policy have the same meaning as in the *Corporations Act 2001* (Cth)).

We are committed to ensuring that your personal information is protected.

## 2. OUR PRIVACY POLICY

Our Policy provides you with general information about how HII manages your personal information. When you acquire a product or submit a claim with us you will receive further information about our privacy practices in a privacy statement (**Privacy Statement**). The Privacy Statement will give you specific information about how we will manage the personal information. A Privacy Statement will be delivered to you in a number of ways, including hard copy/paper or via electronic means.

## 3. PERSONAL INFORMATION WE COLLECT AND HOLD

**Personal Information** means any personal information or an opinion about you, whether or not the information or opinion is true, and whether or not the information or opinion is recorded in a material form.

The types of Personal Information we may collect include:

- your name;
- contact details and address;
- your tax file number;
- bank account details;
- gender; next of kin or emergency contact details; and/or
- any personal information which is either required or needed to be able to provide all the services you require in relation to your policy or claim.

We may also collect sensitive information such as your:

- health status;
- race or ethnic origin; and/or
- membership of a political, professional or trade association (union).

## 4. WHAT HAPPENS IF YOU DO NOT PROVIDE US WITH YOUR PERSONAL INFORMATION?

If we are not able to collect Personal Information about you, we may not be able to provide you with a range of policy or claims services for example:

- be able to assess, investigate or manage your claim;
- set up and administer your policy; or
- provide the claimant/policy holder with any entitlements under the policy.

## 5. WAYS WE COLLECT YOUR PERSONAL INFORMATION

We collect Personal Information including:

- directly from you, for example:
  - o written and/or web forms;
  - o written and/or web forms; through contact over the telephone, mobile or other messaging technology;
  - o via the internet including websites and social media; and/or
  - o in person to person contact.
- from publicly available sources of information; and/or
- from other persons or organisations for example:
  - o our policy holders and their agents;
  - o people involved in claims, including witnesses; and
  - o companies in our Corporate Grouping.

We collect your Personal Information during the information life cycle, when you acquire a policy from us, when you make a claim or exercise a right under the policy, or when a complaint is made using the above methods.

## 6. COLLECTION, USE, AND DISCLOSURE OF PERSONAL INFORMATION

### 6.1. COLLECTION OF PERSONAL INFORMATION

We may collect your Personal Information for the purposes of:

- identifying you and conducting appropriate checks;
- assessing and determining liability, managing, and investigating your workers compensation claim;
- engaging with your employer to manage your workers compensation claim;
- managing, training, and developing our employees and representatives;
- managing complaints and disputes, and reporting to dispute bodies;
- obtaining feedback about your customer experience;
- seeking recovery due to any claim we or our customers may have against another party;
- engaging with medical professionals and other treatment, rehabilitation and care providers regarding your claim;
- providing Personal Information to regulators including the State Insurance Regulatory Authority ('SIRA'); and
- getting a better understanding of you, your needs and how you interact with us so we can
- engage in product and service research, development, and business strategy, including managing the delivery of our services and products and the ways we communicate with you.

### 6.2. USE AND DISCLOSURE

We will hold, use, and disclose your Personal Information for the purposes we collected it, as well as purposes that are related, where you would reasonably expect us to do so. We may also disclose your Personal Information in other ways, for example:

- you have expressly or impliedly consented to the use or disclosure;
- we believe the use or disclosure by us is reasonably necessary for an enforcement activity conducted by or on behalf of an enforcement body;
- we reasonably believe that the collection, use, or disclosure is necessary in order for us to take appropriate action in relation to the matter; or
- we are required or authorised by law to disclose your Personal Information, for example, to a court in response to subpoena, or to the Australian Taxation Office, and Centrelink.

### **6.3. COLLECTION, USE, AND DISCLOSURE OF PERSONAL INFORMATION BETWEEN COMPANIES**

We will collect and disclose your Personal Information to other companies that form a part of our Corporate Grouping. If HII company collects your Personal Information, other companies in the Corporate Grouping may use and disclose your Personal Information for the purposes described in the

### **6.4. COLLECTION, USE, AND DISCLOSURE OF PERSONAL INFORMATION FOR MARKETING**

Marketing is an important part our business. We want to collect, use and disclose your Personal Information so we can keep you up to date with products and services we offer and companies in our Corporate Grouping can offer you. We may use the following marketing strategies including mail, electronic messaging, SMS, telephone and other internet based marketing including targeted online advertising and online behavioural marketing. We may also disclose your Personal Information to third party marketing service providers who may combine the Personal Information we disclose with the information they may already hold on you in order to provide you with relevant advertising about our products and services.

For more information on how we will deal with your Personal Information for the purpose of marketing, please refer to your relevant Privacy Statement. Details on how you can exercise your marketing preferences will be detailed in the relevant Privacy Statement or you can contact us using the details in the 'Contact Us' section of this Policy.

HII does not engage in marketing to claimants.

### **6.5. OVERSEAS DISCLOSURE**

Sometimes we need to provide your Personal Information to, or get Personal Information about you from, persons or organisations located overseas for the same purposes as in '*Collection of personal Information*'. We may disclose your Personal Information to the Philippines, Malaysia, Vietnam and Nepal for the purposes of data processing and administration.

From time to time we may need to disclose your Personal Information to and collect your Personal Information from other countries not listed here. If we do, we will always collect and disclose your Personal Information in accordance with privacy laws.

Your Personal Information may be transferred to other countries, which may not have similar privacy or data protection laws and may in certain circumstances compel the disclosure of Personal Information to a third party such as an overseas authority for the purpose of complying with foreign law or regulatory requirements.

## 6.6. HOW WE HANDLE YOUR PERSONAL INFORMATION

There are a range of parties to whom we disclose and collect your Personal Information that are not you; we have detailed these in the ***Ways we collect your Personal Information*** section of this Policy. These may be parties related to HII or third parties.

We may disclose your Personal Information to, and collect your Personal Information from:

- other companies within the Corporate Grouping and other business divisions within those companies and our Joint Ventures;
- the policy holder;
- your employer;
- where your employer has arranged a policy of insurance through an intermediary, their intermediary, brokers or other financial service providers;
- our representatives or agents;
- hospitals and medical, health or wellbeing professionals;
- rehabilitation, employer or vocational professionals;
- other insurers, reinsurers, insurance investigators, claims and insurance reference services and loss assessors;
- government, statutory or regulatory bodies and enforcement bodies like the Australian Tax Office, Centrelink, SIRA and Independent Review Office (IRO);
- clubs, associations, unions, and other industry relevant organisations;
- research and development organisations assisting in customer, product, business or strategic initiatives;
- data warehouses, strategic learning organisations, data partners, analytic consultants;
- social media and other virtual communities and networks where people create, share or exchange information;
- legal and other professional advisers or consultants;
- a third party that we have contracted to provide claims management, financial services, or administrative services – for example:
  - information technology providers, including complaints management systems;
  - administration or business management services, consultancy firms, auditors, and business management consultants;
  - marketing agencies and other marketing service providers; and
  - print, mail, and digital services, imaging, and document management services;
- publicly available sources of information;
- any other organisation or person where you have asked them to provide your Personal Information to us or asked us to obtain Personal Information from them, for example your partner, spouse, parent, or guardian.

## 7. SECURITY OF YOUR PERSONAL INFORMATION

We may hold your information in:

- computer systems;
- electronic databases;
- digital records;
- telephone recordings; and
- in hard copy or paper files.

We manage the storage of Personal Information in several ways. Personal Information may be managed or administered internally by a company in our Corporate Grouping or managed by a third party storage provider with whom the Corporate Grouping has a contractual relationship and be either

managed locally and/or overseas. We take reasonable steps to protect your Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. The ways we do this include:

- limiting physical access to our premises;
- restricting electronic and physical access to personal information we hold;
- having in place standby systems and information backups to deal with major business interruptions;
- maintaining technology security products;
- requiring any third party providers to have acceptable security measures to keep your personal information secure; and
- destroying or de-identifying personal information.

Our information handling and provision of online services aligns with security best practice ISO 27001 standards for information management. Our security program follows a continual improvement process which includes incorporation of updates to legal and regulatory requirements. All program reviews focus on enhancements to security information management policies, procedures and appropriate technical control deployments such as data loss prevention, anti-malware protection and network security configurations. HII's systems and information technology infrastructure are regularly audited both by internal and independent external parties and regulatory bodies.

HII trains its employees and representatives in their privacy obligations, and provides authorised persons with user identifiers, passwords or other access codes to control access to your Personal Information.

## 8. ANONYMITY AND PSEUDONYMITY

The Australian privacy regime provides the option of not identifying yourself, or of using a pseudonym, unless we are required or authorised by law or a court/tribunal to identify you, or it is impracticable to deal with you anonymously or by a pseudonym.

## 9. ACCESS AND CORRECTION OF PERSONAL INFORMATION

You have the right to request access to, and correct, the Personal Information we hold about you. Privacy Laws provide for specified circumstances where access may be refused. We will provide reasons for any refusal in writing.

If you would like to request access to, or correct the Personal Information we hold about you, please contact us using the details in the '*Contact Us*' section of this Policy. A fee may be incurred for these requests. We will advise you of an estimated fee and payment options when we acknowledge your request which is normally provided within 5 business days. We normally respond to your request within 30 days of receiving your request, however, if we require more time, we will contact you in writing and provide reasons for the further time we require.

We take reasonable steps to ensure the Personal Information we hold is accurate, complete, and up to date. We may refuse your request to correct your Personal Information. If we decide to refuse your request, we will provide reasons for this refusal in writing. You have the right to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading if we refuse to correct your Personal Information. We will take appropriate and reasonable steps to associate that statement with all recordings associated with that information. You can contact us to request the correction to the Personal Information we hold by contacting us the details in the '*Contact Us*' section of this Policy.

## 10. COMPLAINTS HANDLING

If you have a complaint about how we collect, hold, use or disclose your Personal Information or a privacy related issue such as refusal to provide access or correction, please use our complaints process outlined below so that we can help. It is important to follow the complaints process in order to resolve your complaint effectively and efficiently.

If you wish to make a complaint about a breach of this Policy or the Act, you can contact us using the contact details below:

**By email:** [Privacy@hii.au](mailto:Privacy@hii.au)

**By letter:** HII Privacy Officer, Level 3, 345 George Street Sydney NSW 2000

**By telephone:** (02) 8251 9000 and ask to speak with the HII Privacy Officer

Firstly, HII will acknowledge your complaint and explain how we will work with you to resolve it. At this point we may refer your complaint directly to our Privacy Officer. Whilst we're usually able to resolve complaints on the spot or within 5 business days, we'll let you know if we need more time.

If you are not satisfied with our response to a complaint, you can contact us to discuss your concerns or contact the Australian Information Commissioner (OAIC):

**By email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**By website:** [www.oaic.gov.au](http://www.oaic.gov.au)

**By telephone:** 1300 363 992

**By letter:** Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW, 2001

## 11. CONTACT US

Your Case Manager is the best person to contact in the first instance but do not hesitate to contact the HII Privacy Officer:

**By email:** [Privacy@hii.au](mailto:Privacy@hii.au)

**By website:** [www.hii.au](http://www.hii.au)

**By telephone:** (02) 8251 9000 and ask to speak with the HII Privacy Officer

**By letter:** HII Privacy Officer, Level 3, 345 George Street Sydney NSW 2000

## 12. CHANGES AND GETTING A COPY OF THE POLICY

We encourage you to review and check our website regularly for any updates to this Policy. We will publish the updated version on our website and by continuing to deal with us, you accept this Policy as it applies from time to time. If you would like a copy of this Policy, please contact us.





# CONTACTS

CORPORATE OFFICE  
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