



CAPRICORN MUTUAL LIMITED PRIVACY POLICY - reviewed OCTOBER 2023

We are bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) and the Information Privacy Principles contained in the Privacy Act 2020 (NZ). Any reference in this Privacy Policy to the "Privacy Act" is a reference to either or both of those acts as applicable.

We will protect your personal information under with these Privacy Principles and will only use or disclose personal information we hold about you under this Privacy Policy or as otherwise notified to you. We believe that respect for your privacy forms part of the ongoing trust we wish to develop with you.

"Personal information" is information about an individual either identified in the information or whose identity can be ascertained from the information.

This Privacy Policy applies to personal information that we collect from or about you. It also applies to personal information that we collect about you from third parties.

We can provide you with a copy of this Privacy Policy upon request.

For this Privacy Policy, we have referred to personal information as 'information'. Unless otherwise required by the context, reference to 'information' does not include information that is not personal information (whether about you, your business or otherwise).

CAPRICORN MUTUAL LIMITED PRIVACY POLICY	1
Who is covered by this Privacy Policy?	2
Collection of your information.....	2
Using Your Personal Information	5
Disclosing Your Personal Information.....	6
Taking Care of Your Personal Information	8
Accessing Your Personal Information	8
Dealing with us anonymously	9
Correcting Your Personal Information	9
Resolving Your Privacy Issues	9
Changes to this Privacy Policy	10
Contact Us	10

Who is covered by this Privacy Policy?

This Privacy Policy applies to Capricorn Mutual Limited (ACN 104 601 194, AFSL 230038) and its wholly owned subsidiaries (referred to in this privacy policy as “we”, “us” or “our”) including, but not limited to, CML New Zealand Limited and Capricorn Isle of Man Limited.

This Privacy Policy does not apply to Capricorn Society Ltd (ABN 29 008 347 313). The Privacy Policy of Capricorn Society Limited is available on its website (www.capricorn.coop).

This Privacy Policy applies to in respect of our business operations, and products and services we provide, including:

- Your Membership with us;
- Any protections we may issue to you;
- Any claims you may make under any protections issued to you;
- The Weather Alert service provided by us in association with third party providers;
- Your ability to purchase products and services from us using any trade credit account provided to you by Capricorn Society Limited.

By providing us with personal information, you consent to it being used by us for the purposes set out or permitted in this Policy or as otherwise authorised.

Collection of your information

Why do we collect your information?

We collect your personal information so that we can perform various functions and activities – especially the provision of the Membership, protections, and associated services that you may request from us or that may be available to you as our Member.

We also collect your personal information where the law requires us to do so.

If you do not provide us with personal information we request, we may not be able to:

- Assess or accept your application for Membership or protections, determine the amount of contributions applicable to you or assess any claims you may make;
- Manage and administer our relationship with you;
- Let you know about other products or services or benefits associated with being a Member that may be of interest to you;
- Verify your identity and protect against fraud; or
- Allow you to attend a CML or Capricorn Society event or workplace.

Collecting information from you

We collect most information directly from you when you apply for or use one or more of our products and services. For example, you provide us with information when you complete an application for a protection, deal with us over the phone or use our website.

We may collect and hold information from you such as your:

- Name, personal and business contact details including addresses, phone numbers, fax numbers and email addresses;
- Date of birth;

- Financial information relating to you personally or any business you are involved in such as asset and liability statements;
- Information about property and assets you own or use personally or in any business you are involved in such as buildings, vehicles, plant and equipment;
- Information such as renewal dates, current premiums and levels of protection, annual payroll, annual turnover, gross profit and details of previous claims history; and
- Certain health details to determine contributions and assess claims.

We may collect this information from you by way of application form, meeting directly, via telephone, by correspondence, or by email.

Collecting publicly available information

We may also collect information about you that is publicly available, including from:

- Phone directories and trade directories;
- Websites; and
- Public registers such as the companies register, business names register and the personal property securities register in Australia and New Zealand.

Collecting information from third parties

We may also collect information about you from third parties, for example:

- Capricorn Society Ltd, as in our capacity as a preferred supplier of Capricorn Society Ltd we may receive information on you if you are a Member of Capricorn Society Ltd;
- Capricorn Mutual Management Pty Ltd and Capricorn Risk Services Pty Limited, in their capacity as our authorised representatives and outsourced managers of many of our operational functions, including relating to the sale, issue and administration or the protections we provide and the handling of any claims made under them;
- Repairers, investigators, assessors, lawyers or recovery agents with regards to your Membership and protections and any claims you may make;
- Our related companies so we can better manage your relationship with us as a whole; and
- Marketing companies, event organisers, mail houses and other services providers if we use them to assist us in providing our products and services.

Collecting sensitive information

Occasionally we may collect sensitive information about you

“Sensitive information” is information about a person’s 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 orientation, criminal record, health information, genetic or biometric information.

We will not collect, use or disclosure sensitive information about you unless:

- We are legally required to do so; or
- We need that information for one of our functions or activities and we have your consent.

For example, we may collect these types of sensitive information about you:

- Health information for the purposes of considering your application for Membership and protection or to assess claims.
- Information about your membership of professional and trade associations to assist us represent the interest of Members at an industry level when dealing with government or industry bodies.
- health information related to your Covid-19 vaccination status where required to confirm your compliance with any applicable government mandates, our policies or the policies of third party providers (e.g event venues).

Collecting information required by law

We may collect information from you because we are required or authorised to do so under law.

Unsolicited information

Sometimes we may receive unsolicited information about you. If so, we will check whether or not it is reasonably necessary for our functions or activities and we could have collected it from you had we solicited the information. If it is, we will handle this information as we do with other information we seek from you. If not, and it is lawful and reasonable to do so, we will destroy or de-identify it.

Collecting information prospectively

We may also collect personal information from you or from third parties prospectively, having identified you as a person that may wish to use our products or services in the future.

Collecting information from prospective employees

When you are dealing with us as a prospective employee, Capricorn generally collects and uses information about you to process and evaluate your application for employment, including identification information and your employment history as well as information related to your Covid-19 vaccination status.

Unsuccessful application forms may be kept for up to six months to allow those candidates future opportunities.

Collecting information over the phone

When you call us or we call you, we may record the phone call. We will notify you of this at the start of the call and give you the option to not have the call recorded.

We will not take payments over the phone, and instead will provide you with a secure link to make the payment through our third party provided online payment platform.

Collecting information through our website

When you interact with our website, certain information about your use of our website is automatically collected. This may include information such as the date and time of your visit to the website, the pages accessed, cursor movements on the page, documents viewed, previous sites visited, browser type, browser language, general location information, information about the device you used to visit the website and your IP address.

This information may be collected through "cookies" or similar browser or device tracking technologies. We may link information provided by cookies with other information we hold to identify you personally.

We may use cookies for analytical purposes to improve the content and user experience of our website. When we do this, cookies identify your browser or device, but not you personally.

We may also use cookies for functional purposes, to manage certain features of our website including remembering your preferences and selecting and delivering personalised content to you and measuring the delivery and effectiveness of that content.

We may use service providers, including **Google Analytics**, to help us analyse information about your use of our website. Information that can personally identify you is not collected by or provided to these service providers as part of the service they provide to us. The information generated about your use of our website will be transmitted to and stored by our service providers on servers in the United States and around the world. Our service providers will use this information to provide us reports on website use and other services relating to websites.

You can limit or prevent your information from being collected through using private browsers, and by refusing to accept cookies by selecting the appropriate settings on your browser and by installing add-ons to your browser such as the Google Analytics opt-out browser add-on. More information about how Google uses data is available from Google at: www.google.com/policies.google.com/technologies/partner-sites.

Using Your Personal Information

How Will We Use Your Personal Information?

We may collect, hold, use and disclose personal information we collect about you for several purposes, including:

- To provide you, as a prospective Member, with information on your eligibility for Membership with us and for protections issued by us;
- To enable us to consider any application you make for Membership and protection;
- To assess, investigate and manage claims made under one or more of our protections;
- To allow us to manage our relationship with you, including communicating with you about benefits, events or products and services that you may be receiving or may receive;
- To allow us to help a third party provide to you or manage a product or service to you (for example, our *Weather Alert* service);
- To assist in the management of arrangements with third parties where we have appointed them as authorised representatives or outsourced functions to them that are relevant to the provision of our products or services to you;
- To assist in our general management and administration including for example: risk management, strategic development, systems development, credit management, debt collection, staff training, compliance and research (including market research conducted in collaboration with another party);
- To deal with any enquiries, complaints or concerns with or against us and to manage any legal action that may arise between you and us now and in the future in relation to the provision of our services;
- To prevent or investigate any actual or suspected fraud, illegal act or misconduct;
- To enforce our legal rights;
- To comply with any laws, regulations, codes of practice or payment system requirements; and
- Any other purpose that is permitted by law or that you consent to.

Disclosing Your Personal Information

Who do we disclose your information to?

Consistent with the uses of your information described above, we may disclose information about you to:

- Capricorn Mutual Management Pty Ltd, in its capacity as our authorised representative and manager of the services that we provide;
- Capricorn Risk Services Pty Ltd, in its capacity as our authorised representative and manager of the services that we provide;
- Our related companies, and our employees, officers, assignees, contractors, service providers, mail-houses and external advisers;
- Other businesses or third parties who assist us in providing products and services to you or otherwise provide services to us in relation to our business (including but not limited to a third party assisting us to conduct research for the purposes of services and product improvement), which may be located overseas;
- Any person authorised by you, such as a broker or other person that you have appointed to manage your risk protection requirements;
- Any named party to your Membership and protection;
- Our reinsurers, who may be located overseas;
- A dispute resolution organisation, such as the Australian Financial Complaints Authority (for the purpose of resolving disputes);
- Law enforcement bodies, regulatory bodies and government bodies;
- Our professional advisors, including lawyers and accountants;
- Payment system operators;
- Related companies or agents that provide computer hosting and support services, which may be located overseas including in New Zealand and the Isle of Man;
- Capricorn Society Ltd and all of its subsidiaries for the purpose of permitting the management and administration of any products or services that Capricorn Society Ltd or its subsidiaries may provide to you and market research connected to these products and services; and
- Any other party you consent to.

In the event of a claim we may disclose your personal information to:

- A repairer or supplier for the purpose of repairing or replacing your protected items;
- An investigator, assessor, State or Federal authority, medical practitioners, hospitals or other professional advisers for the purpose of investigating or assessing your claim;
- A lawyer or recovery agent for the purpose of defending an action by a third party against you or recovering our costs including your excess;
- A witness to a claim for the purpose of obtaining a witness statement; and
- Another party in a claim for the purpose of obtaining a statement from them or seeking recovery from them or to defend an action by a third party.

Marketing and your privacy

Our focus is on people and organisations working together for the mutual benefit of all involved. As part of our services to you, we may use your information so that products, services or benefits that we think you may be interested in can be identified and directly marketed to you.

We, or other third parties we have a relationship with may contact you from time-to-time about new or existing products or services that we or they offer.

We consider that directly marketing to you by us or other third parties with which we have a relationship forms an integral part of delivering services to you and is directly related to the primary purpose for which we originally collected your information. Without such a service, the communication between you, us and other third parties which we have a relationship with would be substantially reduced and you would be unlikely to receive the benefits and returns you expect from being one of our Members.

We may provide your information to other third parties for the purposes of that third party directly marketing their products or services directly to you.

You can let us know at any time if you no longer wish to receive marketing materials from us (see "Contact Us"). Also, you can let any third party know at any time if you no longer want to receive marketing materials from them.

Our direct marketing publications all include details on how you can opt-out of receiving such communication..

Overseas Disclosures

We may share your information across the countries we operate in for the purposes set out or permitted in this Policy or as otherwise authorised. We operate in Australia, New Zealand and the Isle of Man.

Our website and some of our products or services, or parts of them, may be hosted by or supported by service providers that operate from across the world. We and our service providers may also use cloud-based software solutions to perform internal processes and provide you with the products and services you request. This means that any information which you provide to us, including by email or through our website or using the products and services we provide, may be transferred, used or stored outside of Australia or New Zealand. We try to ensure that where your information is transferred outside of Australia or New Zealand by us or our service providers, appropriate measures and controls are in place to protect that information.

Your information may be shared, stored, held or used by an overseas person or organisation to provide you with the products or services you have requested or may receive from us, including in these situations:

- When employees in other countries in which we carry out business require the information for operational purposes;
- When we engage businesses in other countries (which may include countries outside of those in which we carry out business) to provide products and services to you or otherwise provide services to us in relation to our business;
- When we obtain reinsurance from reinsurers who are located throughout the world. Our reinsurers may change from time to time;
- When it is needed by related companies or agents that provide computer hosting and support services, including in New Zealand and the Isle of Man;
- When you consent to the disclosure; or

- When obtaining your consent is not practicable and we consider that the disclosure is for your benefit and that you would have consented to the disclosure.

Taking Care of Your Personal Information

How do we take care of your 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 try to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- Physical security of business premises;
- Confidentiality requirements of our employees;
- Record management procedures;
- Security measures for access to our systems;
- Only giving access to personal information to persons who reasonably require access in order to perform their duties;
- Control of access to our buildings; and
- Electronic security systems, such as firewalls and data encryption on our website.

We can store personal information physically or electronically with third party data storage providers (including those that may be located or host information overseas).

What happens when we no longer need your information?

We will only keep your information as long as we require it for the purposes it was collected for. We are also required to keep some of your information for certain periods of time under law. When we no longer require your information, we will ensure that your information is destroyed or de-identified.

Accessing Your Personal Information

How Do You Access Your Personal Information?

Generally, you may know all the information we hold about you. We will give you access to your information in reasonable time upon your request to us, using the contact details provided in the Privacy Policy.

We will give you access to your information in the form you want it where it is reasonable and practical to do so. We may charge you for our reasonable expenses incurred in giving you access, but we will always notify you before complying with your request for access.

In certain circumstances we cannot give you access to your information. For example, this may include when:

- Giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- The access would have an unreasonable impact upon the privacy of other individuals;
- The request for access is frivolous or vexatious; or
- The access would be unlawful, would prejudice any legal investigations; or

- Giving access would reveal evaluative information generated in a commercially sensitive decision-making process.

If we cannot provide your information in the way you have requested, we will tell you why in writing and attempt to find an alternative way to satisfy your request.

Dealing with us anonymously

If you have general enquiries, you can make this anonymously or by using a pseudonym. We may also offer anonymity regarding surveys and questionnaires. However generally, we will not be able to deal with you anonymously or where you are using a pseudonym if:

- It is impracticable for us to do so; or
- We are required or authorised by law or a court/tribunal order to deal with you personally.

It is impractical for us to offer anonymity or pseudonymity to individuals in relation to our main business activities, including the provision of protections.

Correcting Your Personal Information

How do you correct your personal information?

We try to make sure that the personal information we collect, use or disclose is accurate, complete and up to date. We also try to ensure that personal information we hold is relevant having regard to the purpose for which it was collected.

Contact us if you think there is something wrong with the information we hold about you and we will try to correct it if it's inaccurate, out of date, incomplete, irrelevant or misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We will try and help where we can and, if we cannot, we will let you know in writing.

Resolving Your Privacy Issues

How can you make a complaint?

If you believe that your privacy has been breached, or you do not agree with a decision we have made about your access to or correction of personal information, you can make a complaint to our Privacy Officer and we will endeavour to resolve your complaint by following our internal complaint resolution process.

We will try to address any complaints we receive and provide you with a written response within 21 days.

If you have any concerns, you may complain in Australia to the Office of the Australian Information Commissioner or the Australian Financial Complaints Authority and in New Zealand to the New Zealand Privacy Commissioner.

Need more help?

For further information about privacy issues in Australia and protecting your privacy, you may visit the Office of the Australian Information Commissioner website at www.oaic.gov.au/privacy.

For further information about privacy issues in New Zealand and protecting your privacy, you may visit the Privacy Commissioner's website at www.privacy.org.nz.



If you still feel your privacy issue has not been resolved to your satisfaction, then you can raise your concern with our external dispute resolution scheme through the Australian Financial Complaints Authority, the Office of the Australian Information Commissioner (if you are in Australia), or the Office of the New Zealand Privacy Commissioner (if you are in New Zealand) on the details provided below.

The Australian Financial Complaints Authority

Online: www.afca.org.au
Email: info@afca.org.au
Telephone: 1800 931 678 (free call)
Mail: Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001

The Office of the Australian Information Commissioner

Online: www.oaic.gov.au
Email: enquiries@oaic.gov.au
Telephone: 1300 363 992 or + 61 2 9284 9749
Facsimile: (02) 9284 9666
Mail: GPO Box 5218, Sydney NSW 2001.

The Office of the New Zealand Privacy Commissioner

Online: www.privacy.org.nz
Email: enquiries and complaints can be lodged via the website
Telephone: 0800 803 909
Facsimile: (04) 474 7595
Mail: PO Box 10-094, The Terrace, Wellington 6143.

Changes to this Privacy Policy

We will occasionally review this Privacy Policy. We will let you know of any changes by posting a notification on our website and updating the date of this Privacy Policy. We encourage you to review our Privacy Policy from time-to-time for any changes. Any changes to our Privacy Policy will be effective on the date they are published on our website.

Contact Us

We care about your privacy and always welcome your feedback. Please contact us if you wish to have any questions about the way we handle your information.

Phone: 1800 327 437 (Australia)
0800 401 444 (New Zealand)
Email: privacy@capricornmutual.com
Mail: The Privacy Officer
Capricorn Society Limited
Locked Bag 3003
West Perth WA 6872
Australia