



PRIVACY POLICY v2.0

In this Privacy Policy, 'we', 'us' and 'our' means O'Reilly Mitchell Empire Limited T/As Serenity Insurance Brokers. We respect the privacy of your personal information. This Privacy Policy sets out how we collect, store, use and disclose your personal information, which we do in accordance with the Privacy Act 2020.

What personal information we collect

In New Zealand, under the Privacy Act 2020, "personal information" means information about an identifiable individual. We collect certain types of personal information about you, including:

- information in relation to the application for, provision and administration of insurance, such as your contact details, date of birth, employment details, health information, details of previous insurances and past insurance claims and criminal records;
- financial, billing and invoicing information;
- if you visit our website, we will collect personal information that you submit, such as via online forms; and
- any other personal information you otherwise provide to us.

If you do not provide us with the information that we need, we or any of our third-party service providers may not be able to provide you with products or services.

How we collect your personal information

We may collect personal information in a number of ways, including:

- directly from you via our website, telephone, in writing or email; and/or
- indirectly from third parties, if necessary. For example, your employer, referees, insurers, premium funders and other third-party service providers or publicly from available sources.

You authorise us to contact such third parties for the purposes of providing you with the information or services that you have requested.

Our purposes for using and disclosing your personal information

We use and disclose your personal information for the purposes of providing our services to you and related purposes. Such purposes include:

- assessing and managing your insurance application and policy;
- managing and processing payments;
- communicating with you about our products and services;
- conducting market or customer research;
- administering claims;
- developing, establishing and administering alliances and other arrangements with other organisations in relation to the promotion, administration and use of our services;



- telling you about our other service offerings which we believe may be relevant (if you have requested to receive this);
- statutory or regulatory reporting;
- internal or external audit;
- utilizing proprietary technology platforms, algorithms, and secure software systems to analyze markets, process your information, and optimize your insurance placements; and
- any other purpose notified to you at the time your personal information is collected.

Disclosure of your personal information

We will disclose your personal information to:

- **specific insurers and reinsurers** we engage with to assess, manage, and underwrite your policies (see '*Indirect Collection by Insurers*' below);
- other insurance intermediaries, insurance reference bureaus and industry bodies;
- assessors appointed by insurers to assess or investigate your claims;
- others named on your policy as co-insureds;
- service providers engaged to provide services to you in relation to your insurance (such as providing repairs);
- third parties who help manage our business and provide our services, including our third party service providers, such as payment system operators, IT suppliers, lawyers, accountants, other advisers and financial institutions;
- any other entities notified to you at the time of collection; and
- courts, law enforcement, regulators and other government agencies to comply with all applicable laws, regulations and rules.

Indirect Collection by Insurers (Privacy Act 2020 - IPP3A) When we arrange, manage, or process your insurance, we collect your personal information and pass it onto insurers. Under the Privacy Act 2020, these insurers are collecting your information "indirectly" from us.

To assess your insurance application, issue your policy, and manage any claims, we will disclose your personal information to specific insurers. Depending on your insurance needs, this includes, but is not limited to:

- **NZI (a business division of IAG New Zealand Limited):** Information is collected and held by NZI. You can view their privacy policy and contact details at www.nzi.co.nz.
- **Vero Insurance New Zealand Limited:** www.vero.co.nz
- **QBE Insurance (Australia) Limited - New Zealand Branch:** www.qbe.com/nz
- **Chubb Insurance New Zealand Limited:** www.chubb.com/nz-en



- **AIG Insurance New Zealand Limited:** www.aig.co.nz
- **DUAL New Zealand Limited:** www.dualnewzealand.co.nz
- **Delta Insurance New Zealand Limited:** www.deltainsurance.co.nz
- **Market Lane Insurance Group:** www.marketlanegroup.com.au
- **The Barn Underwriting Agency:** www.thebarnagency.com.au
- **Zurich New Zealand:** www.zurich.co.nz
- **Star Insurance Specialists:** www.starinsure.co.nz
- **Agile Underwriting Services:** www.withagile.com
- **HDI Global Specialty SE - New Zealand:** www.hdi.global/en-nz
- **Allianz New Zealand Limited:** www.allianz.co.nz
- **360 Underwriting Solutions New Zealand** www.360uw.co.nz
- **Insure Direct** www.insuredirect.co.nz
- **Berkshire Hathaway Specialty Insurance** www.bhspecialty.com/nz/
- **Overseas Underwriters and Syndicates:** Information may also be collected and held by Certain Underwriters at Lloyd's of London (UK) and various other specific underwriters based in Singapore and Australia. Due to the syndicated nature of these markets, the specific managing agents and capacity providers vary. General privacy information can be found at www.lloyds.com. Specific privacy policies and contact details for the exact underwriters taking on your risk will be provided to you at the time of quoting or binding.

These insurers hold your information for the purposes of providing insurance products and services. You have the right to access and correct the personal information they hold about you. By providing your information to us, you acknowledge that we will share your details with these intended recipients.

Other than when required or permitted by law, as specified in this Privacy Policy or where you have provided your consent, we will not disclose your personal information. Nothing in this Privacy Policy prevents us from using and disclosing de-personalized aggregated data.

Storage and Transfer of personal information overseas

We utilize a combination of third-party service providers and highly secure, proprietary distributed storage networks to manage and protect your data. This means your personal information may be processed, routed, or hosted in data centre's located outside of New Zealand, primarily within Australia and Singapore, as well as the United Kingdom, United States of America, India, Malaysia, Philippines, Vietnam, Thailand, Japan, and South Korea.

In this regard, unless exempted by the Privacy Act 2020, we would have sought your express authorisation to do so prior to the transfer of your personal information overseas.



Overseas disclosure and storage of your personal information will only be made for one or more of the purposes specified in this Privacy Policy. We take appropriate steps to ensure that any cross-border data transfers and offshore storage architectures are carefully managed to protect your privacy rights. This includes ensuring data is housed in jurisdictions (such as Australia and Singapore) that are subject to privacy laws providing a comparable level of legal protection as the New Zealand Privacy Act 2020, or ensuring that alternative, robust contractual safeguards are in place.

Your obligations when you provide personal information of others

You must not provide us with personal information of any other individual unless you have the express authorisation of that individual to do so. If you do provide us with such information about another individual, before doing so you:

- must tell that individual that you will be providing their information to us and that we will handle their information in accordance with this Privacy Policy;
- must provide that individual with a copy of (or refer them to) this Privacy Policy; and
- warrant that you have that individual's consent to provide their information to us.

If you have not done this, you must tell us before you provide any third-party information.

Your obligations when we provide you with personal information

If we give you, or provide you access to, the personal information of any other person, you must only use it:

- for the purposes we have agreed to; and
- in compliance with applicable privacy laws (including the Privacy Act 2020) and this Privacy Policy.

You must also ensure that your agents, advisers, employees and contractors meet the above requirements.

Accuracy, access and correction of your personal information

We take reasonable steps to ensure that your personal information is accurate, complete and up to date whenever we collect, use or disclose it. However, we also rely on you to advise us of any changes to your personal information. Please contact us using our contact details below as soon as possible if there are any changes to your personal information or if you believe the personal information we hold about you is not accurate, complete or up to date.

You can make a request to access your personal information or to have it corrected by contacting us using the contact details below. If you make an access request, we will provide you with access to the personal information we hold about you unless otherwise required or permitted by law. We will notify you of the basis for any denial of access to your personal information. We may charge a fee where permitted by law.

Security of your personal information



We take reasonable steps to protect any personal information that we hold from misuse, interference and loss, and from unauthorised access, alteration and disclosure. However, data protection measures are never completely secure and, despite the measures we have put in place, we cannot guarantee the security of your personal information. You must take care to ensure you protect your personal information. You should notify us as soon as possible if you become aware of any security breaches. Where required by law, we will notify you of any notifiable privacy breach concerning your personal information.

Updates of Privacy Policy

We reserve the right to amend our Privacy Policy from time to time to ensure we properly manage and process your personal data.

How to make a complaint

If you wish to make a complaint about a breach of this Privacy Policy or any breach of applicable privacy laws, you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint together with any supporting evidence and information. You can also complain to the Privacy Commissioner (see www.privacy.org.nz).

How to contact us

If you wish to gain access to your personal information, want us to correct or update it, have a complaint about a breach of your privacy or any other query relating to our Privacy Policy, please contact us at louise@serenityinsurancebrokers.co.nz or by calling +64 211 945547.