

Cover•More

*Worry Less.*



# Privacy Policy for State Travel Insurance policyholders

**New Zealand**

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# About Cover-More's Privacy Policy

**Cover-More is committed to the safe and careful use of your personal information. We take reasonable steps to protect any personal or sensitive information you provide to us from misuse, interference, loss, unauthorised access, modification or disclosure. We handle information in an open and transparent way.**

## **1. Cover-More**

Cover-More Group Limited is an Australian Securities Exchange listed travel insurance and assistance group of companies. Cover-More (NZ) Limited is part of the Cover-More Group.

In this Privacy Policy when we refer to "Cover-More", "we", "our" or "us", we mean Cover-More (NZ) Limited.

## **2. The purpose of the Privacy Policy**

This Privacy Policy ("this Policy") outlines how we manage your personal information. It also describes generally the type of personal information held and for what purposes, how that information is collected, held, used and disclosed and how it may be accessed.

This Policy will be reviewed at least annually, to ensure it remains up to date. It was prepared in December 2014 and it may be amended from time to time by posting the amended version on our website.

### **Further information**

For further information on privacy in New Zealand, please visit the website of the Office of the Privacy Commissioner at [privacy.org.nz](http://privacy.org.nz).

# Your personal information and its collection

## 3. What is personal information?

Personal information is information that can identify or reasonably identify you.

The provision of your personal information is voluntary. However, if you choose not to provide us with the information we have requested, we may not be able to provide you with our services or products or properly manage and administer services and products provided to you or others.

We will only collect personal information to assist or enable us to perform one or more of our functions or activities. We collect the personal information we need to provide travel insurance and travel related products and services, including assistance when you are travelling.

The type of information Cover-More collects and holds varies depending on the type of product or service we provide to you. For example, Cover-More will hold different information about you if you have a travel insurance policy than if you make a claim on a policy or require assistance when travelling. This information may include information about a permanent or temporary medical condition that you have or health information in general.

Cover-More regularly collects, holds, uses and discloses health information and is committed to protecting the privacy of this type of information to a higher degree than that of other personal information.

Cover-More may collect and hold the personal information (including health information) regarding:

- Your travel plans
- Information about your medical history and the medical history of any other person you wish to insure
- Health information about anyone who requires assistance under their travel insurance policy
- Information about the medical history of any person that results in a claim that we have to assess
- Information about claims you make or wish to make under your policy
- Your bank account details so that we may process the payment of your claim
- The last eight digits of your credit card so that we may recover any monies payable under the travel insurance provided by the credit card company
- Other information required to administer the product or services you have requested including determining a claim
- Any details contained within identity documents provided to us including government identifiers such as a passport number
- The type of medical and non-medical assistance you have been provided with either by us, our service providers or your own medical practitioner
- Employment and income information for cancellation and loss of income claims
- Background and credit checks (for authorised representatives and suppliers only), and
- Any information contained within the Cover-More corporate mobile application where you have authorised us to do so.

## 4. How we collect your personal information

Cover-More collects personal information from and on behalf of customers, business partners, suppliers, employers (relating to corporate policies), other insurers and third party service providers.

We will, if it is reasonable or practicable to do so, collect your personal information directly from you. This may happen when you fill out an application form for travel insurance, become one of our representatives, make a claim or request assistance. This may occur over the phone, via email, a website or through one of our agents or partners.

In certain cases we collect your personal information from third parties. For example, we may need to collect personal information from your representative (such as a legal guardian), your travel consultant, the primary policy holder or any of the other organisations referred to below under Use and disclosure and identified in APPENDIX 2: Entities Cover-More typically discloses to and/ or collects from.

However, we may also collect your personal information from third parties who assist us in assessing and processing your claim, or who may assist us in providing medical assistance services, making international payments or investigating your claim. For example, we may need to collect personal information from your representative (such as but not limited to a legal guardian/ emergency contact), your travel consultant, the primary policy holder or interpreters, loss adjustors, investigators and international payment facilities. For further information about third parties, we may indirectly collect information from, please [click here](#).

Where you provide information to your agent or travel consultant to pass onto us as part of the policy application or claims process, we rely on you having provided them with your consent to pass this information to us. In addition, when you provide information, including sensitive information about other individuals on your travel insurance policy, we rely on you to inform them of the information you are providing, how we will use, hold, collect and disclose this information and on you obtaining their consent.

If you are a travel consultant or third party service provider we may obtain information from a credit reporting agency or your agency group head office.

Where your company is the applicant on a corporate policy we may receive your details from your employer.

In addition, we collect information when you visit our website, Facebook page and other pages that we own and manage.

We may also collect information by other means and will take reasonable steps to inform you if and when we do.

Your personal information will be held by Cover-More, Level 18, 125 Queen Street, Auckland 1010 and IAG New Zealand Limited (“IAG”), the owner of the “State” brand, 1 Fanshawe Street, Auckland 1010, and by their data storage providers, which may include cloud-based storage providers.

## 5. What personal information does Cover-More collect?

We will only collect personal information where it is necessary for us to perform one or more of our functions or activities. We collect the personal information we need to provide travel insurance and travel related products and services, including assistance when you are travelling.

The type of information Cover-More collects and holds varies depending on the type of product or service we provide to you. For example, Cover-More will hold different information about you if you have a travel insurance policy than if you make a claim on a policy or require assistance when travelling. This information may include information about a disability, or medical condition that you have or health information in general.

If you contact us by telephone, these calls may be recorded for training, quality and business purposes and we will use personal information to identify you for security purposes.

For the type of personal information Cover-More generally collects and holds please refer to **APPENDIX 1: Information Cover-More typically collects, uses and holds.**

## 6. Protecting your personal information

We take reasonable steps to securely store your personal information so that it is protected from loss, unauthorised use, access, modification or disclosure and from other misuse. We store personal information in different ways, including in paper and electronic form, on both Cover-More premises and its data centres and our service providers premises and data centres, which include IT service providers and document storage and management providers.

We maintain reasonable administrative, technical, and physical safeguards for the protection of personal information. Our security measures include, but are not limited to:

### Administrative safeguards

- Access to your personal data is limited to authorised personnel who have a legitimate need to know based on their job. In the case of third-party contractors who process personal information on our behalf, similar requirements are imposed.
- Only allowing access where the individual seeking access has satisfied our identification requirements, such as a security check on the commencement of a call
- Confidentiality requirements for our employees and suppliers
- Secure Document storage
- Training and education is provided to all group employees in the handling of personal information

### Technical safeguards

- Security measures for systems access
- Antivirus and anti-malware software, and regularly updated virus definitions
- Third parties who we hire to provide services and have access to personal information agree to implement privacy and security practices that we deem adequate
- Personal information provided on computer servers is secured in a restricted and controlled network environment
- When transferring credit card numbers, via payment gateways the data is encrypted
- Employing firewalls and intrusion detection systems

### Physical safeguards

- Third-party contractors who process personal data on our behalf agree to provide reasonable physical safeguards
- Employing physical and electronic means such as alarms and cameras to protect against unauthorised access to buildings
- Effectively and securely destroying data no longer needed, for example, by shredding or pulping in the case of paper records
- Our security procedures and policies are audited on a regular basis to ensure they are updated in accordance with current legal requirements and current levels of security technology.

While Cover-More has security measures in place to protect your data, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, neither Cover-More nor IAG can warrant or ensure the security of any information you transmit to Cover-More or IAG, or Cover-More or IAG transmit on your behalf, or to you, in the course of providing services over the Internet. Neither Cover-More nor IAG will be liable for any unauthorised access to your personal information caused by malicious third party action, or other causes outside Cover-More's or IAG's reasonable control.

## **7. Using unique identifiers**

Cover-More does not adopt or assign any unique identifiers. In certain circumstances we may be required to collect government identifiers such as your National Health Index number. We do not use or disclose this information other than when required or authorised by law to fulfil our obligations to the agency which assigned the identifier, or unless you have voluntarily consented to the disclosure of this information, or where the use and disclosure of the information is necessary for the provision of emergency assistance.

## **8. Non completion of online quotes**

If you do not complete an online quote request for any reason Cover-More may contact you on the contact details supplied to offer help completing it.

# Use and disclosure

## 9. How we use and disclose your personal information

We use and disclose your personal information to provide you with the relevant product or service you have requested including: assessing your travel insurance application; identifying you; to manage and administer the product or service; assessing and paying a claim; or to provide you with assistance when travelling.

We may use and disclose your information for another purpose. We will obtain your approval if we use or disclose your information for another purpose except where:

- you are not identified by this use or disclosure; or
- the source of the information is publicly available; or
- the other purpose is directly related to the purpose for which the information was collected; or
- the use or disclosure is required for legal reasons or to prevent or to lessen a serious threat to the life and safety of an individual or the public in general.

For a list of the types of uses of your personal information and disclosure by Cover-More please refer to **APPENDIX 3: Cover-More's list of uses and disclosure of personal information**.

IAG and its related companies may also use the information to send you material about other products or services as described below, in the **Marketing other products and services** section.

## 10. Your personal information and our related companies

When assessing your claim, we may refer to information provided by our third party medical and non-medical assistance providers, who include related entities.

We may also use related entities to process and assess your travel insurance application or claim and to administer your insurance policy. These related entities may be based in New Zealand or overseas in Australia, the United Kingdom, Malaysia, China or India.

## 11. Collection of information by IAG

From time to time (for example, when you apply for insurance with a State representative over the telephone), your personal information may be collected by IAG. That information will be passed onto Cover-More who will manage, use and disclose this information as set out in this Policy. IAG may also from time to time collect information from Cover-More and/or other suppliers and business partners.

If you contact IAG by telephone, these calls may be recorded for training, quality and business purposes and IAG will use personal information to identify you for security purposes.

IAG will maintain reasonable administrative, technical, and physical safeguards for the protection of personal information.

In addition to passing the information onto Cover-More, IAG will use the information and disclose it to third parties for the purposes set out in the **Marketing other products and services** section. Your personal information may also be used by IAG for planning, product development and research purposes, market analysis and research, and product analysis and development.

You have the right to request access to information held by IAG about you and you may ask for it to be corrected in accordance with the Privacy Act 1993. IAG's contact details are set out in the **Contact us** section.

## 12. Marketing other products and services

IAG and its related companies may from time to time provide information to you regarding other products and services offered by IAG, its related companies and/or its affiliates. You authorise IAG and its related companies to use your name, phone number, email address and address to advise you of those other products and services. If you do not wish to receive this information please call 0800 80 24 24 or email [personal@state.co.nz](mailto:personal@state.co.nz).

Neither Cover-More nor its related companies or affiliates (including the insurer, Zurich Australian Insurance Limited trading as Zurich New Zealand) will provide information to you regarding other products and services (whether offered by Cover-More, its related companies or its affiliates or otherwise) unless they have obtained the prior written agreement of IAG.

## 13. When we share your information with other parties

We will share (disclose) your personal information with third parties if it is required to fulfil service or product obligations to you, or if it is required under law or in an emergency situation.

We will also share your personal information with IAG and its related companies for the purposes discussed above in the Marketing other products and services section

Before discussing the progress of a claim or the medical and non-medical assistance that we provide with third parties (other than the parties involved in providing such a service), for example, a relative or companion, we will obtain appropriate consent from you, your parent or guardian, power of attorney or executor (as relevant).

For a list of the types of entities Cover-More generally discloses your personal information to please refer to **APPENDIX 2: Entities Cover-More typically discloses to and/or collects from.**

## 14. Transferring personal information overseas

By purchasing a policy through us, you are consenting to us sending your information to overseas parties if required to provide you with medical and non-medical assistance or to progress and assess your claim.

The countries we typically disclose your personal information to under these circumstances are generally located in the geographic regions you travelled during the duration of your policy.

# Your privacy on the internet

## 15. Collection of other information

Cover-More may also collect non-personally identifiable information such as the type of browser, or operating system you use, your domain name, IP address, access times, referring website addresses and page views. Our Internet Service Provider (“ISP”) automatically identifies your computer by its IP address. When you visit pages on our website, our ISP may log your IP address. We do not link IP addresses to any personally identifiable information. Your IP address is used to gather broad demographic information only. A User Transaction ID is created each time you enter our website. This ID is used to keep track of your dealings with us, and other requests.

### **Cookies**

Cover-More does not use cookies to collect information which can personally identify you.

A cookie is a small, text-based file used frequently on some websites and portals. They are designed to assist and streamline the exchange of information between your computer’s browser and our computer systems. Other cookies used by Cover-More collect information about the use of our websites. The information collected includes where visitors connect from, what version of browser they use and their path through the site. It helps us to provide personalised features and keep our content fresh and relevant.

If you do not want information collected through the use of cookies, you can configure your cookie preferences and options through your browser.

### **Web beacons**

Our web pages may contain electronic images, known as web beacons or spotlight tags. These enable us to count users who have visited certain pages of our website. Web beacons and spotlight tags are not used by us to access your personal information, they are simply a tool we use to analyse which web pages customers view, in an aggregate number.

### **Links to other websites**

Our web sites may contain links to non-Group web sites. Whilst such links are provided for your convenience, you should be aware that the information handling practices of the linked web sites might not be the same as ours.

# Dealing with Cover-More

## 16. The accuracy of your personal information

Cover-More takes reasonable steps to ensure that the personal information collected, used or disclosed is accurate, up to date, complete, relevant, and not misleading.

If you believe your personal information is not accurate, up to date, complete, relevant or is misleading, please contact the Cover-More customer service team on 0800 500 225 and ask us to correct your information.

## 17. Gaining access to and correcting your personal information

You can request access to your personal information from Cover-More in most cases without restriction or charge. If charges are applicable for providing access we will disclose these charges to you prior to providing you with the information. In limited circumstances, a request for access may be denied, or restricted access given. We will provide reasons in writing for the denial of or limitation on access.

To arrange access please contact us (see the [Contact us](#) section). In some cases we may be able to deal with your request over the telephone. Where we are not able to deal with your request over the telephone, we will advise you of our timeline for responding to your request. If your request to be treated as urgent we may require you to provide us with your reasons for the request being treated as urgent.

Access to the requested information may include providing you with copies of the original documentation, providing you with the opportunity for inspection of the documentation at our premises or providing you with a summary of the documentation.

We will correct personal information if we discover, or you are able to show that the information is incorrect. If you seek correction and Cover-More disagrees that the information is incorrect, we will provide you with our reasons for taking that view and advise you on the further steps you may take.

## 18. Resolving your privacy issues

Please contact us if you have concerns about the way in which we have handled your personal information or would like to discuss any issues about our Privacy Policy. You are always welcome to speak directly to our staff and they will do their best to resolve your issue. We also have a complaints process including external dispute resolution and a nominated Privacy Officer who can be contacted as detailed in the [Contact us](#) section.

If you are not satisfied with our final decision, you can direct your complaint to the Privacy Commissioner, either on 0800 803 909 or by email to [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz)

## 19. Your travel consultant or broker and your personal information

We require our agents and partners to handle your personal information in a manner consistent with this policy. Your travel consultant or broker is authorised to arrange your travel insurance.

We rely on you having provided your agent with your consent if you would like us to share information about your claim or existing medical condition assessment with them. You may choose to deal directly with Cover-More if you prefer not to provide them with information about existing medical conditions and health related matters included in your claim.

## **20. Contact us**

### **Cover-More**

#### **Customer Service**

PO Box 105-203

Auckland City

Auckland 1143

Email: [enquiries@covermore.co.nz](mailto:enquiries@covermore.co.nz)

Phone: 0800 500 225

or

#### **The Privacy Officer**

Cover-More Insurance Services Pty Ltd

Private Bag 913

North Sydney NSW 2059

Australia

Email: [privacy.officer@covermore.com.au](mailto:privacy.officer@covermore.com.au)

### **IAG**

Email: [personal@state.co.nz](mailto:personal@state.co.nz)

Phone: 0800 80 24 24

# APPENDIX 1: Information Cover-More typically collects, uses and holds

In general, Cover-More may collect and hold the following personal information:

- Name and address
- Date of birth
- Contact details, which may include your telephone number and email address
- Your gender
- Personal information of any other person you wish to insure, including date of birth, gender and name
- Your travel plans
- Information about your medical history and the medical history of any other person you wish to insure
- Personal information, including health information, about anyone who requires assistance under their travel insurance policy
- Information about the medical history of any person that results in a claim that we have to assess
- Information about claims you make or wish to make under your policy
- Your bank account details so that we may pay your claim
- The last eight digits of your credit card so that we may recover any monies payable under the travel insurance provided by the credit card company
- Other information required to administer the product or services you have requested including determining a claim
- Any details contained within identity documents provided to us including government identifiers such as a passport number and National Health Index number
- The type of medical and non-medical assistance you have been provided with either by us, our service providers or your own medical practitioner
- Employment and income information for cancellation and loss of Income claims
- Background and credit checks (for authorised representatives and suppliers only).

## APPENDIX 2: Entities Cover-More typically discloses to and/or collects from

Below are the types of entities Cover-More may collect your personal information from and may disclose your personal information to. This is not an exhaustive list.

- Our Insurer
- Other insurers, including your insurer if not Cover-More
- IAG New Zealand Limited and its related companies
- Reinsurers
- The co-insured on any insurance policy, so we may confirm details of the insurance
- Your travel agent, broker or the consultant who sold you the travel insurance
- Your employer (if a corporate policy)
- Claims administrators
- Investigators, in relation to claims
- Translators, for claims and assistance
- Goods replacement suppliers to settle your claim
- Banks and foreign currency providers to settle your claim
- Transportation and accommodation providers
- Travel consultants and wholesale travel agencies
- Any company who we may claim against
- Medical practitioners and specialists
- Medical providers such as hospitals
- Emergency assistance providers
- Security providers and consultants
- Family members in the event of a medical emergency
- Witnesses, when making a claim
- Record management and storage businesses
- Companies who perform statistical analysis on our behalf
- Customer survey businesses\* and mystery shopping agencies
- Accreditation or certification organisations
- Our professional advisors including lawyers, accountants, tax advisors and auditors
- Debt collection agencies and other parties that assist with debt-recovery functions
- Police and law enforcement bodies to assist in their functions
- Courts of Law or as otherwise required or authorised by law

- Regulatory or government bodies for the purposes of resolving customer complaints or disputes both internally and externally or to comply with any investigation by one of those bodies
- Insurance reference bureaus
- Data retrieval agencies
- Credit providers or credit reporting agencies (if you are our representative or supplier)
- Printing, mail and distribution companies
- Loyalty programs.

\*Cover-More may only disclose to or collect from these businesses with the prior written agreement of IAG New Zealand Limited (the owner of the "State" brand).

## APPENDIX 3: Cover-More's list of uses and disclosure of personal information

We use and in some instance disclose your personal information when we, or third parties appointed by us, provide the following services:

- To identify you and other policy holders
- Arranging and managing your travel insurance with us
- To assess an application for a product, including assessing any existing medical conditions
- Evaluating, managing, processing and paying an insurance claim
- To recover monies due by other insurers
- Evaluating the emergency care and assistance you require and other customer care activities
- Providing medical and non-medical assistance, including settling costs on your behalf
- Dealing with enquiries or complaints
- To monitor and improve the services provided by us and our agents or service providers, the products we provide or our operations<sup>^</sup>
- For planning, product development and research purposes and to seek feedback on products and services (including those products and services offered by others on our behalf)<sup>^</sup>
- Carrying out market analysis and research and product analysis and development<sup>^</sup>
- Enhancing our services for our website visitors
- Conducting internal investigations in relation to crime and fraud prevention, detection or prosecution
- Training our staff
- To identify and develop products or services<sup>^</sup>
- Carrying out accreditation or certification activities
- For any other purposes that would be reasonably expected
- Processing orders or applications to become a customer for our additional products and services, such as Global SIM
- Carrying out credit checks, credit reporting and compliance checks on our representatives and suppliers
- Carrying out debt-recovery functions.

<sup>^</sup>Cover-More may only use or disclose your information in this way with the prior written agreement of IAG New Zealand Limited (the owner of the "State" brand).