



## Privacy and Security Policy

1st March 2009

### Privacy Policy

Once Life Pty Limited (**Once**) is subject to the National Privacy Principles in the Privacy Act 1988 (Cth). This Privacy Policy explains in general terms how Once protects the privacy of your personal information under the National Privacy Principles. It also sets out the matters which we are required to disclose to individuals under National Privacy Principles 1.3 and 1.5. The principles set out in this Privacy Policy will apply to any personal information you provide to Once via our website or under any other agreement or arrangement and to information which we collect about you from other sources.

This Privacy Policy does not apply to acts and practices of Once which relate directly to the employee records of our current and former employees.

### How we collect your personal information

We generally collect your personal information directly from you. For example, we may collect personal information about you when you deal with us over the telephone, send us your application or other correspondence (whether by letter, phone, fax or e-mail), visit our website or when you have contact with us in person.

Generally, the type of personal information we collect about you includes your name, mailing address, telephone number, e-mail address and financial and employment information. For our insurance products we will collect health and lifestyle information so that the insurer can assess whether to accept your insurance proposal and, if so, on what terms. In certain circumstances, we may also collect sensitive information about you such as information relating to your criminal record (if any) and the nature of that record;

There may be occasions when we need to source personal information about you from a third party. If we collect personal information about you in this way, we will take reasonable steps to ensure that you are aware of the purposes for which we are collecting your personal information and the organisations to which we might disclose your personal information.

### Our disclosure statement

Once collects personal information (including identification information required to comply with anti-money laundering and counter-terrorism financing laws) for the following purposes:

- to obtain contact details of clients, consultants or employees;
- to decide whether to supply services to potential customers;
- to establish, provide and administer your relationship with us (including products and services provided to you);
- to comply with laws which apply to us (including anti-money laundering and counter-terrorism financing laws);
- to market our services;
- to respond to your queries; and
- to ascertain the suitability of potential employees.

Without your information we may not be able to provide you with products and services or we may delay, block or refuse to make a payment or action an instruction relating to our products and services.

We may disclose your personal information (including identification information required to comply with anti-money laundering and counter-terrorism financing laws) on a confidential basis to:

- our suppliers, contractors and agents for the purpose of providing services to us so that we can supply you;
- our related bodies corporate and other organisations with whom we have alliances or arrangements, and their contractors and agents;
- your employer/accountant (as relevant) and your agents, including your legal adviser, your executor, administrator or attorney;
- entities that provide you with services (Billers) and Billers' agents and contractors;
- (if BPAY applies) BPAY Pty Ltd and participants in BPAY including BPAY Billers
- suppliers of information technology services, so that they may provide those services;
- law enforcement, regulatory and government bodies, government agencies and courts as and when required by law;
- credit reporting agencies, payment systems operators and debt collecting agencies;
- financiers and any person considering purchasing the business or any credit facility (or any part of the business or credit facility);
- any person to whom we may assign your credit contract/s (and their advisers and representatives);
- insurers; and
- professional advisors (lawyers, accountants and auditors) for the purpose of obtaining advice and professional services.

## **How we use and disclose your personal information**

We will use and disclose personal information for the primary purpose for which it was collected. We may also use and disclose personal information for purposes related or ancillary to the main reason we collect it. We may (unless you tell us not to) disclose personal information we collect to third parties for the purposes of allowing them to direct market their products and services.

We engage third party contractors to perform services for us which involves the contractor handling personal information we hold. For example, we engage third party contractors to provide part time services on an ad hoc basis, for example client services and office management. In these situations, we prohibit the third party contractor from using personal information about you except for the specific purpose for which we supply it.

We utilise "cookies" (small files placed on a user's computer by our web page server) on our website ([www.onceonline.com.au](http://www.onceonline.com.au)) which enable us to monitor traffic patterns and to serve you more efficiently if you revisit the site. A cookie does not identify you personally but it does identify your computer. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

## **Gaining access to information we hold about you**

Once will, on request, provide you with access to the personal information we hold about you, unless there is an exception which applies under the Privacy Act 1988 (Cth).

Your request to obtain access will be dealt with in a reasonable time. Once may recover from you its reasonable cost of providing you with access. If Once refuses to provide you with access to the information, Once will provide you with reasons for the refusal and inform you of any exceptions relied upon under the Privacy Act 1988 (Cth).

## **Keeping your personal information up-to-date**

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it.

If you find that the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will take reasonable steps to correct this information, or if necessary, we will discuss alternative action with you.

## **Security of your personal information**

We protect any personal information that we hold from misuse and loss. We also protect it from unauthorised access, modification and disclosure.

Your personal information may be stored either in hardcopy documents, as electronic data, or in Once software or systems.

We maintain physical security over our paper and electronic data stores and premises, such as locks and security systems. We also maintain computer and network security; for example, we use firewalls and other security systems such as user identifiers and passwords to control access to our computer system.

## **Transfer of information to foreign countries**

We may transfer your personal information to our related bodies corporate (or any other third parties acting on our behalf) in foreign countries. If we do so, the Privacy Act 1988 (Cth) will continue to apply and our related bodies corporate (or any other third parties acting on our behalf) have strict privacy policies in place. We will only transfer your personal information to other people outside Australia with your express or implied consent.

## **How to contact us**

If you wish to gain access to your personal information or make a complaint about a breach of your privacy or if you have a query on how your personal information is collected or used, or any other query relating to Once Privacy Policy, please contact our Privacy Officer by emailing:

[privacy@onceonline.com.au](mailto:privacy@onceonline.com.au) or in writing to us at:

The Privacy Officer, Once, GPO Box 3288, Sydney NSW 2001.

We will respond to your query or complaint as soon as possible and will try to resolve any complaint within 5 working days. If this is not possible, we will contact you within that time to let you know how long we estimate that it will take to resolve your complaint.