

## Compare the Market and Compare the Meerkat Privacy Policy

### INTRODUCTION

This Policy contains important information about how we manage personal information. It applies to all of the services offered by Compare the Market Pty Ltd ACN 117 323 (**CTM, we, us, our**) and the platforms through which we interact with you, including the [www.comparethemarket.com.au](http://www.comparethemarket.com.au) and [www.comparethemeerkat.com.au](http://www.comparethemeerkat.com.au) (**websites**), your CTM Customer Account, CTM's social media accounts (**social media**) and the Compare the Market call centre (**call centre**).

We may modify this Policy at any time, and if we do, we'll publish it on the websites. We are bound by the *Privacy Act 1988* (Cth) and the Australian Privacy Principles contained within that Act.

The Services we provide include comparison services in relation to car insurance, home & contents insurance, health insurance, electricity & gas plans, travel insurance, pet insurance, life and income protection insurance, home loans, international money transfers, business insurance, roadside assistance and fuel.

The services we offer may change from time to time.

### PERSONAL INFORMATION WE COLLECT

#### Personal Information

Depending on your interaction with us, the information that we collect may include (but is not necessarily limited to) your name, address, date of birth, gender, insurance history, employment information, marital status, proof of identification information (e.g. driver's licence, passport details), bank account details, social security information, Medicare number, details about the risk you want to insure, details regarding your financial circumstances and future requirements, details about your property values, and your contact details.

In some cases we may collect information that is usually non-personally identifiable (such as location data, data about personal attributes or online identifiers) but that, taken together with other collected data, may identify you, either directly or indirectly.

Where practicable, we will allow you to deal with us anonymously or by using a pseudonym.

#### Sensitive Information

If you wish to compare certain products (such as health insurance or life insurance), we may also, where necessary, collect sensitive information from you. Sensitive information includes any information about your racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information. Currently, we may collect information about your trade or profession, your health fund memberships, and certain other health information, in order to provide our service for certain products.

### HOW WE COLLECT AND HOLD PERSONAL INFORMATION

We collect personal information from you:

- Directly and voluntarily;
- Automatically;
- Via third party sources.

#### Information provided voluntarily by you

We collect personal information you provide to us, including when you:

- Create or use a customer account on our website or through our mobile application;
- Interact with our website or call centre to obtain a quote or make an application for products and services;
- Interact with our social media, including communicating with us via social media platforms;
- Subscribe to electronic communications;
- Enter promotions or competitions, depending on the entry requirements;
- Submit an enquiry or complaint, provide feedback or make a customer service request;
- Download software and mobile applications, where you may provide your name, contact details and other information for the purposes of accessing and using the service;
- Participate in surveys, market research or audience testing.

We have implemented an automated messaging system (**chatbot**) on our Compare The Market Facebook account. If you decide to communicate with us via Facebook, the chatbot will collect your personal information and refer those details to us to enable us to respond to your enquiry. If you do not want to interact with our chatbot, you can communicate with us directly at <https://www.comparethemarket.com.au/contact-us/>.

Any personal information that you provide to obtain a comparison (other than compulsory third party insurance) or to purchase products or services on the websites or through the call centre is collected and managed by CTM. Personal information that you provide to purchase products or services on third party websites which are linked to our website is collected and managed by those third parties (see our Website Terms and Conditions, available on the websites, for more information about those third party websites).

### **Information collected automatically**

We generate and maintain a record of information when you visit our website. CTM uses cookies or similar types of technology to automatically collect information including your IP address, the device you use to access our website or social media, your location, the sites you visit immediately before or after our website and the frequency and duration of your interactions with our website.

We may track activity relating to your interaction with our email communications and with links embedded in email communications and our website or social media.

This type of information is usually collected, used and stored by CTM or its marketing company to measure the effectiveness of our advertising and how visitors use the website in order to:

- provide you with a better and more customised service and a more effective website;
- collect information on how many visitors the websites receive, how those visitors use the websites, where they came from and where they go; and
- determine whether you have made purchases of certain products elsewhere, after using the websites.

You can configure your browser so it does not accept cookies, but this may affect the functionality of the websites. We may also collect and store information on your personal device using browser web storage and data caches

### **Information provided by or collected from third parties**

We may be provided with or collect information from third parties about you. This can include where:

- we engage organisations to collect personal information directly and voluntarily from you on our behalf. Where reasonably possible, we require organisations engaged on our behalf to comply with this Policy and all applicable privacy laws and regulations.
- we receive information from our participating suppliers, for example, after you purchased a product from the supplier after interacting with CTM;
- we engage an organisation to conduct market research or audience testing; or
- another person provides information about you, for example, a family member arranging a policy of insurance for a family or couple health policy.

We may use analytics tools, web beacons and other technology to obtain aggregated and non-identifiable information such as usage and user metrics collected by third parties when you interact

with our website and social media. Organisations who collect such information may aggregate information collected from your interactions with us with other information they have also collected elsewhere. Third party organisations typically collect and use information under their own privacy policies. We currently obtain such information via Google Analytics and our third party ad servers.

In accordance with applicable terms of use for social media platforms and associated applications, we may be provided with information about you if you engage with us on social media.

Information for a compulsory third party insurance comparison is collected and managed by the relevant State or Territory authority in accordance with their privacy policy. The State and Territory authorities do not provide your Personal Information to CTM.

If we collect information about you from a third party, we will determine whether we could have lawfully collected that information directly from you and, if not, we will destroy or de-identify that information (provided it's lawful to do so).

## **WHY WE COLLECT, HOLD AND USE PERSONAL INFORMATION**

We generally collect, hold and use personal information for four purposes:

1. service provision;
2. communication;
3. optimization and enhancement; and
4. marketing and advertising.

We may notify you that we also collect, hold and use personal information for other purposes from time to time.

Where required or authorized by law, we may also share your personal information with third parties if we genuinely believe that the sharing of that personal information is required or authorised under law.

### **Provision of services and products to you**

We use your personal information to:

- to provide you with our services and products including via our website or via our call centre;
- to provide to our business partners or participating suppliers so that they can (where you have agreed) provide you with updates or information about their products and services and provide you with reminders;
- to assist with any enquiry you make about home loans;
- to provide to our service providers so that they can provide us with services that assist us to run our business and the websites;
- to reconcile transactions with our business partners or participating suppliers that supply you products because of our services;
- communicate with you about our loyalty program;
- to provide to our service providers who we engage to provide you with your prize if you win a promotion.

In some cases, if you do not provide the information, we will not be able to provide our services to you and you may not be able to claim your prize.

### **Communication**

We use your personal information to provide you with customer support, including dealing with complaints and enquiries. We may also use your information for activities including:

- to send you a summary of your quote and comparison results;
- to administer competitions and promotions;
- to send special offers or reminders;
- to seek your opinions and feedback; and
- to telephone you about the services and products we offer.

If you win a competition that we (or our agents) run, we may also seek your consent to use your name, image (e.g. photograph) and/or voice recordings for the purpose of promoting or marketing the competition and/or our services.

## **Optimisation and enhancement**

We use your personal information to provide, improve and maintain our website and call centres and the Services we offer, including to develop new products and services. Your information may also be used:

- to prevent abuse and fraud;
- in conjunction with other information, for analytical and statistical purposes;
- to personalize and customise your online experience, including advertisements and content; and
- for other administrative and internal business purposes.

CTM may record details or block particular I.P. addresses (and where required provide those details to third parties to assist us) to maintain the integrity of the website where there is suspicious or excessive use of the websites.

If you have a customer account, we may use the information from that account to prefill relevant fields on our website to assist you to complete a quote comparison (or other activity).

## **Marketing & Advertising**

We use your personal information to market and advertise our business and products and services to you. Your information may also be used to customize and display advertisements and content for you.

We may use various services or organisations to analyse collected data about your interaction with our website, services or other aspects of our business. The information that is collected is not generally personally identifiable as it is aggregated data that does not identify any individual user.

Third party organisations may share user information they collect from our website with other analytics companies that collect, analyse and report on data obtained from their clients. In some cases, the non-personally identifiable information collected from our website or services may be linked with information collected by a third party source to become personally identifiable. We will not link or merge information collected by us with information collected by third party organisations without your consent. However, Google, Facebook or other third parties may merge or link your information if you have provided your consent for them to do that.

By using our website, call centre and services, you consent to:

- a) the collection of data by our ad servers or third party affiliates, or the transfer of information to them, wherever necessary, for optimisation and enhancement of our website and services and to tailor the content and advertising that is delivered to you; and
- b) receiving email or SMS communications from us. If you provide us with a false email or mobile number, we may be unable to provide you with the requested information or your quote summary, and personal information may be accessible to a third party. To safeguard personal information that may be accessible from communications from us, we recommend that you only provide us with contact details over which you maintain access and control.

You can opt out of marketing and advertisements at any time. The process for unsubscribing from our communications is set out below.

## **KEEPING YOUR PERSONAL INFORMATION SECURE**

We generally store personal information on networks in Australia.

We will take reasonable precautions to ensure that the personal information that we have about you is protected against any unlawful use, unauthorised access, modification or disclosure and these precautions include:

- using appropriate information technology and processes;
- using computer and network security systems with appropriate firewalls, encryption technology and passwords for the protection of electronic files;
- securely destroying or “de-identifying” personal information if we no longer require it subject to our legal obligations to keep some information for certain prescribed periods; and

- restricting access to your personal information to our employees and those who perform services for us who need your personal information to do what we have engaged them to do;
- requesting certain personal information from you when you wish to discuss any issues relating to the products and services we provide to you.

While we undertake reasonable steps to protect your personal information, no guarantee can be given that information sent over the internet is always 100% secure. Sending and receiving information over the internet is at the user's own risk, however we will take all reasonable steps to ensure your data security once we receive it.

If we believe or suspect that the security of your Personal Information has been compromised, we may attempt to notify you electronically so that you can take steps to protect yourself from harm.

Where reasonably possible, we will destroy or de-identify your information if it is no longer required for the purpose for which it was collected or any related purpose (subject to any relevant record keeping obligations under Australian law).

### **Disclosure of Personal Information to overseas recipients**

We do not disclose Personal Information of our customers to overseas recipients. Where we engage with overseas entities for the provision of third party services, these providers have Australian based servers which ensure that Personal Information is retained onshore.

In a small number of cases, we hold Personal Information in data storage and cloud computing facilities operated by us (or by third parties for us) that may be in overseas locations. Currently, we maintain a database of personal information (primarily name, email address and phone number) with overseas providers who are in the USA and the EU. Personal Information stored by us in overseas locations is secured in a dedicated database and encrypted to ensure it is not disclosed to overseas recipients.

Please note that some of our participating suppliers may operate call centres that are based overseas, and so if you enquire about a product with them, you may call or be called by one of those call centres. If you provide information to a participating supplier, the collection, storage and use of that information will be managed by the participating supplier and subject to their privacy policy.

### **WHEN WE DISCLOSE PERSONAL INFORMATION**

We do not sell, license or otherwise disclose your Personal Information to third parties unless such disclosure is for the purposes set out in this Privacy Policy.

#### **Participating suppliers**

We may provide your information to participating suppliers to enable suppliers to provide products and services to you. This may include providing your information to a supplier:

- if you wish to obtain a quote for products or services (in some cases, your personal information will be relevant to calculating the cost of the products or services offered to you); and
- if you decide to enter into an agreement with that supplier or wish to obtain further information.

#### **Third party affiliates and service providers**

We may provide your information to our third-party affiliates who carry out services on our behalf or to service providers to enable service providers to perform business functions for us. Whenever possible, we require such third parties to only collect and use Personal Information in accordance with this Policy, and for no purpose other than providing us with our requested services. This may include service providers we engage to supply prizes to you on our behalf.

#### **Co-branding**

If you use a product or service that is co-branded or that is part of a joint promotion involving us and one or more third parties, your information may be collected by each party. Generally, we do not control the management or use of information by third parties. You should consult each respective privacy policy to confirm how each party will manage and use your information.

**Legal requirements**

We may disclose your information if, in our reasonable opinion, we are legally bound to do so or if such disclosure is necessary to prevent harm to ourselves, other users or third parties. We will notify you of such disclosures.

**Change of ownership**

If there is a change of control in respect of our company, your information may become accessible by a third party if we are required to transfer assets to them.

**Interactive platforms**

Any personal information that you submit, display or publish on an online platform or website, including social media, is publicly available and may be read, collected, used and disclosed by us or other users of those platforms subject to the terms of use of those sites. If you decide to interact with us via social media, your limited data from your social media profile may be collected and provided to us or other third parties.

**ACCESS TO YOUR PERSONAL INFORMATION**

You have the right to access and correct your personal information we hold. In certain situations (e.g. if required or permitted by law), we can deny access to some or all the personal information we hold. We will always provide reasons in writing if access is refused. We may charge you a reasonable fee for access to your personal information, but we will advise you of the fee before we process your request. We will always respond to requests for access and/or corrections within a reasonable period and we will give access in the manner requested if it is reasonable and practicable to do so. Please email or write to our Privacy Officer (see Contact Information) if you wish to access or correct your personal information.

If you provide us with information about another person, you must have that person's consent before you provide the information to us. You must also tell the person we have collected their personal information; the person is entitled to access the information we hold; and he or she should refer to this document to understand how we manage their personal information.

**DATA DELETION OR UNSUBSCRIBE FROM MARKETING COMMUNICATIONS**

If you no longer wish to receive marketing communications from Compare The Market or Compare The Meerkat, please use the unsubscribe link contained in all of our email communications. If you use the unsubscribe link in our email communications, you will be removed from the distribution list for email communications, but you may continue to receive communications from us by SMS or phone.

You can contact us by calling 1800 456 981 or email [privacy@comparethemarket.com.au](mailto:privacy@comparethemarket.com.au) to opt out of all communications or request the deletion of your personal information or customer account.

**HOME LOANS – VERIFICATION OF IDENTITY**

If you complete a home loan application through us, we will be required to verify your identity, which we will do in accordance with specific Online Identity Verification Terms which we will present to you at the time that we are carrying out the verification. We will not use any of the identity verification information captured by us in that process for any reason not set out in those terms.

**PRIVACY COMPLAINTS**

If you have a complaint about the way we manage your personal information, including any decision made regarding a request for access or correction of your personal information, please contact our Privacy Officer (see Contact Information):

Our Privacy Officer will endeavour to resolve any privacy complaints and will respond in writing to you regarding the outcome of any investigation. If your privacy concerns are not resolved satisfactorily or you wish to obtain more information on the privacy legislation, you can contact the Office of the Australian Information Commissioner (see Contact Information).

**CONTACT INFORMATION**

<b>Privacy Officer:</b>	<b>Office of the Australian Information Commissioner:</b>
Phone: (07) 3198 8018	Phone: 1300 363 992
Email: <a href="mailto:privacy@comparethemarket.com.au">privacy@comparethemarket.com.au</a>	Email: <a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>
PO Box 301, Toowong QLD 4066	GPO Box 5218, Sydney NSW 2001
	Website: <a href="http://www.oaic.gov.au/privacy">www.oaic.gov.au/privacy</a>