

# PRIVACY POLICY

## **Allianz Partners NZ Privacy Policy**

Your privacy is important to us. This Privacy Policy sets out how Allianz Partners\* collects, stores, uses and discloses personal information obtained from you and others.

This Privacy Policy is intended to provide transparency about our personal data processing activities for individuals (sometimes called 'data subjects') in respect of whom we collect, store, use, and disclose their personal information (activities collectively referred to as 'processing'). Privacy rights and obligations are governed in New Zealand by privacy legislation. In addition, certain European law applies to any processing activities that fall within its scope, namely the General Data Protection Regulation (the 'GDPR'). GDPR requirements are outlined below under the heading 'GDPR'. Where we collect or process your personal information, we will provide you with a Privacy Notice or other privacy disclosure documentation which is a summary of the matters set out more fully in this Privacy Policy.

## What is 'personal information'?

Personal information is information about an identifiable individual.

## What kinds of personal information do we collect and hold?

The personal information processed by us generally includes your name, address, date of birth, gender, contact details including phone number and email address, as well as additional information specific to the product or service provided to you including (but not limited to) medical information, country of origin, residency status, visa type, and health and/or property information. For some products and services, we process personal information that is sensitive information. This includes information about your health and pre-existing medical conditions, genetics and membership of any professional associations or groups, where it is relevant to the product or service we provide.

For employment applications, we collect your name, address, nationality, contact details (including emergency contact details), current and past employment information, educational qualifications and professional associations. We also collect information about and proof of your residency status, the name and contact details of your referees and other information required for recruitment purposes. Where we seek your consent to conduct a background check, we also collect details of your proof of identity from you.

We maintain strict security measures in order to protect your personal information. On this website any personal information provided by you is held securely by us and any credit card data is held by third parties.

## How do we collect your personal information?

Where it is possible, we collect your personal information directly from you in person, in writing, over the telephone, by facsimile, through our or our agents' and partners' online services and website forms and/or by electronic messages including email and SMS. In some circumstances, we may also collect it from:

• your agents or representatives, for example your insurance broker, your legal advisers, your family members or travelling companions who act on your behalf or who apply for a travel or other

- insurance policy or other services that cover or apply to you, or from other persons authorised by you to deal with us;
- third parties who you have asked or permitted to provide your personal information (including sensitive information) to us, including your referees, universities and other educational institutions that you attend, doctors, hospitals, your vet in the case of pet insurance and medical assistance providers;
- third parties from whom you purchase goods and services including insurers, and other entities who engage us to provide or offer additional products and services such as ticket insurance;
- our agents (including travel agents) and service providers, some of whom are located in countries other than New Zealand;
- insurers and the Insurance Claims Register;
- people who are involved in a claim or assist us in assessing, investigating, processing or settling claims, including third parties claiming under your policy, witnesses, medical service providers, external claims data collectors and verifiers, and your employer;
- third parties who may be arranging insurance cover for a group that you are a part of;
- law enforcement, dispute resolution, statutory and regulatory bodies;
- marketing organisations, including through the use of purchased lists;
- industry databases;
- publicly available sources such as the Internet and telephone directories; and/or
- the general public when it is unsolicited and may be relevant to a particular policy, service, or fraud investigation.

Unless we are required or permitted by law to collect sensitive information about you, we will only do so where you have given consent.

If you nominate individuals to be covered by your insurance policy (including family members or partner or spouse) or under a group insurance policy, or you, in other circumstances, provide us with personal information about other individuals, you should have explicit authority to act on their behalf or first obtain the individuals' consent to do so and direct them to this Privacy Policy and make them aware of the content of any Privacy Notice we provide to you.

The collection of information is required pursuant to the common law duty to disclose all material facts relevant to the insurance sought and is mandatory. If you do not agree to the above or will not provide us with personal information, we may not be able to provide you with our services or products, process your application, issue you with a policy or process your claims.

If you decide to complete or partially complete an online application form, where permitted by law, the information that you enter into the online form may be used by us to contact you to see if you are interested in our products or services.

We record telephone calls for administration and quality assurance purposes. If you do not want your call or personal information recorded, please advise us and we will attempt to make alternate arrangements suitable to you.

## Website tracking

We may collect information about your visit to our site using cookies and tracking information. This is to assist us to measure and improve our website. Examples of information that we collect include: day and time of your visit, whether you have visited our website previously, whether you used a search engine to find us and some geographical information about what country you are in.

We use analytical web tools such as Google Analytics to collect visitor information so that we can better understand how to improve our products and services for you. One of the primary methods used by this tool is the placement of cookies. Cookies are small information files that an end user's web browser places on their computer when a website is visited. This does not identify you personally but allows us to use the site to ensure any advertising is shown to the most appropriate party. For information on disabling these cookies, please go to the privacy settings section within your browser. In addition to the session cookie, Google Analytics uses other data collection methods such as appending query strings to an image request. We store the data generated by Google Analytics securely and do not share it with third parties.



We also use third party remarketing cookies e.g. through Google Adwords. These cookies allow us to display tailored advertising to you on different websites across the internet based on your prior visits to our site. We do not collect any identifiable information about you through this remarketing process. You can opt out of Google's use of cookies by visiting Google's Ads settings http://www.google.com/settings/ads.

We also utilise other external companies for the following purposes:

- for web hosting services for this website; and/or
- to gather non-personal information (using cookies) in order to evaluate the website's effectiveness, for example online marketing activities.

#### **Email**

We retain the content of any email that you send to us to enable us to provide our products and services, or if we believe we have a legal requirement to do so. Your email message content may be monitored by our employees for security issues including where email abuse is suspected, and our response to you may be monitored for quality assurance issues.

## For what purposes do we process your personal information?

We process your personal information for the purposes of providing our products and services and managing our business. This may include:

- arranging, evaluating and managing insurance products (including travel insurance products, pet insurance and overseas student and visitors cover);
- managing our rights and obligations in relation to the insurance services;
- managing and offering renewals and continuity of our products and services;
- · assessing risks and monitoring product performance;
- · assessing, investigating, processing and settling claims;
- marketing (where permitted by law or with your consent) our services and products and those of our related companies, brokers, intermediaries and business partners that may interest you;
- conducting customer research and data analytics in relation to our service and products, and improving or developing our service and products;
- handling complaints and disputes, and managing litigation;
- training our employees, agents and representatives;
- IT systems maintenance and development;
- · detecting, investigating and preventing fraud;
- · recovering from third parties;
- identifying and contacting individuals who do business with us;
- assessing and processing employment applications and managing employment disputes; and/or
- screening measures to comply with economic sanctions obligations.

## Who do we disclose your personal information to and why?

We may disclose your personal information to others for the purposes specified in the section above. This may include disclosure to:

- our related and group companies;
- our distributors and agents;
- · insurers and reinsurers;
- the Insurance Claims Register;
- government, law enforcement, dispute resolution, statutory, regulatory or enforcement bodies and agencies;
- · external data collection and verification agencies;
- loss adjusters and assessors;
- repairers and suppliers;
- claims handlers, cost containment providers, investigators and recovery agents;



- your travel agent;
- your broker;
- · transportation providers;
- medical and health service providers, case managers and rehabilitation consultants;
- our advisers (including legal, actuary and accounting advisers) and service providers, including marketing organisations and debt collection agents;
- professional and other organisations;
- your employer;
- parties that we have an insurance scheme or other arrangement in place with under which you purchased your policy or obtained a service;
- the agent and contractor of any of the third parties above; and/or
- other third parties as required by law.

## Disclosure to overseas recipients

In some instances and in order to provide our products or services or to efficiently conduct our business activities, your personal information might be disclosed to other companies and business units in the Allianz Partners Group and the Allianz SE Group, to our business partners, and to reinsurers and service providers that may be located overseas. The countries in which these recipients may be located will vary from time to time, but may include France, Singapore, India, Canada, Germany, Australia, United Kingdom, United States of America, Thailand, and other countries where the Allianz Group has a presence (a list of which is available on the Allianz Group website www.allianz.com) or engages subcontractors.

We disclose your personal (including sensitive) information to recipients outside of New Zealand when it has been collected for travel insurance arranged or managed by us and you require our medical assistance, travel, or related services. We will use reasonable endeavours to ensure people we disclose your personal information to outside New Zealand are required to protect it in a way that provides comparable safeguards to those set out under New Zealand privacy law, such as via contractual data protection obligations, Allianz Group binding corporate rules or because they are subject to laws of another country with comparable protections. However, you acknowledge that sometimes overseas recipients of your personal information may not be required to protect it in a way that provides comparable safeguards to those provided under the New Zealand privacy law. You authorise us to disclose your personal information to overseas recipients as described in this Privacy Policy.

# Direct marketing and your privacy

Where permitted by law or with your consent, we may contact you by telephone, normal mail, email, electronic messages such as SMS, and via other means with promotional material and offers of products or services from us, our related companies, as well as offers from our business partners that we consider may be relevant and of interest to you. Where we contact you as a result of obtaining your consent, you can withdraw your consent at any time by calling our Contact Centre on 0800 800 048 or by contacting us – see below.

## **Marketing opt-outs**

In circumstances where we can lawfully send you offers and promotions, if you do not want to receive such offers from us (including product or service offerings from us on behalf of our agents, intermediaries and/ or our business partners) or do not want us to disclose your personal information to our related and group companies and business partners for marketing purposes, you can opt out at any time. To opt out you can send an email to AzPNZ.Privacy@allianz-assistance.co.nz with your request, write to our "Privacy Officer", PO Box 33313, Takapuna, Auckland 0740, or call us on 0800 800 048. You can also click the "unsubscribe" link in any email you receive from us.

We do not use sensitive information for marketing purposes or provide that information to any third parties for marketing.



#### How do we hold your personal information?

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

- in our computer systems or databases, which may involve storing data on storage or computer systems provided by third party suppliers;
- in paper records; and/or
- in telephone recordings.

Where it has been collected from an agent or our service providers, they may also hold copies of your personal information.

We may combine personal information we receive about you with other information we hold about you. This includes information received from third parties and information collected for different products and services.

#### Links to external sites

We may include links to external sites that we consider contain content relevant to the information that you were seeking from us. Where these links occur, we accept no responsibility for the accuracy of the content, the privacy or security of those sites or your reliance on any information contained within any such site.

#### Contacting us about access to and correction of your personal information

Allianz Partners aims to ensure that your personal information is accurate, up to date, complete and relevant. If you would like to seek access to, or revise your personal information, or feel that the information we currently have on record is incorrect or incomplete, please contact us by sending an email to AzPNZ. Privacy@allianz-assistance.co.nz with your request, by calling us on 0800 800 048, or by writing to our "Privacy Officer", PO Box 33313, Takapuna, Auckland 0740.

# Making a complaint

If you believe that we have interfered with your privacy in our handling of your personal information, you may lodge a complaint by contacting us using the above contact details.

We will attempt to resolve your complaint in accordance with our internal disputes resolution process. You can obtain a copy of our Internal Complaints and Disputes Process by contacting us.

If you are unhappy with the resolution of your complaint or with the way that Allianz Partners has handled your complaint, you may be able to refer the matter to the Privacy Commissioner at:

## Office of the Privacy Commissioner

P O Box 10 094 The Terrace, Wellington 6143 www.privacy.org.nz

# **GDPR and Privacy Policy**

With the commencement of the European Union General Data Protection Regulation (the 'GDPR') on 25 May 2018, certain data subjects have additional rights and protections in respect of any processing activities that fall within the scope of that law. You will be covered if you are a resident of an EU country when you purchase one of our products, we provide you with a service in the EU, if we have an established office or operation located in the EU, or if we process your personal data in the EU. Rights and obligations set out in the GDPR include, in general terms, those matters set out in the paragraphs above as required under New Zealand privacy law. For instance, the requirement for openness and transparency about



data processing activities including the provision to you of a Privacy Notice explaining what we do with your personal data, the right of access to correct and update your personal data, the requirement to have proper data security measures in place and the following (some of which are covered under New Zealand law):-

- As well as the right to request access to check, correct and update your personal data, you may
  also request information about its origin, how we hold it and where, the purposes of the processing,
  and details of the entity such as Allianz Partners as the data controller or data processor, and the
  parties to whom it may be disclosed;
- You may request a copy of your personal data in an electronic format for yourself or for someone you nominate;
- You may, in some circumstances, restrict the processing of your personal data and request that it be
  deleted. Where your personal information is used or processed with your specific consent as the
  sole basis for processing (rather than on a contractual basis or legitimate interest), you may
  withdraw your consent at any time;
- We retain your personal data for a period of time to enable us to provide our services, to manage
  any claims that may arise in connection with the provision of our products and services (or those we
  provide on behalf of our business partners), and to improve our product offerings and customer
  service. We only retain data for as long as is necessary for the purposes for which it may be lawfully
  used.

For any queries or complaints concerning processing covered by the GDPR, please contact us by email at AzPNZ.Privacy@allianz-assistance.co.nz

#### **Advertisers and Business Partners**

This Privacy Policy only relates to websites that are hosted and managed by Allianz Partners. You should be aware that we are not responsible for the practices of our advertisers or business partners. Our site may contain links to other sites. You should check their privacy policies before providing personally identifiable information to them or to any other third party.

# Our business lines and trading names

This Privacy Policy applies to the various products and services provided by us, trading as Allianz Partners, either under our brand names or those of our partners, travel and other insurance products (including ticket insurance, student insurance, pet insurance and emergency assistance).

We may make changes to this Privacy Policy from time to time for any reason. We will publish changes to this Privacy Policy on this website.

\*Allianz Partners is the trading name of AWP Services New Zealand Ltd of Level 3, 1 Byron Avenue, Takapuna, Auckland. Allianz Partners has been authorised by the insurer to act on its behalf of to issue and manage insurance products and handle and settle claims in relation to insurance products.

