

## Privacy Policy

### Our Commitment

We recognise that your privacy is very important to you. We are committed to protecting the privacy of your Personal Information in accordance with the Privacy Act 1988 (Cth). The Privacy Act details Australian Privacy Principles that set minimum standards for how private sector organisations such as us should collect, use, disclose, store, and provide access to Personal Information.

We are committed to complying with the Australian Privacy Principles.

### Currency and Status of Our Privacy Policy

Our current Privacy Policy is detailed below. It is current as of and from December 2021. We suggest that you read it thoroughly.

This policy may change from time to time and all changes will be posted on our website so please check it periodically. You can call us on 0424 850 786 or email our privacy officer at [info.vasfs@gmail.com](mailto:info.vasfs@gmail.com) and/or write to VAS Financial Pty Ltd, Level 1/5 Everage Street, Moonee Ponds, VIC 3039 and request a copy of our most recent policy.

### Definitions in this Privacy Policy

'Our', 'Us' and 'We' refers to VAS Financial Pty Ltd, ABN 68 666 396 078, of Level 1/5 Everage Street, Moonee Ponds VIC 3039, Australia, and its related Companies, including all of our Authorised Representatives. 'Personal Information' is any 'information or an opinion about an identified individual, or an individual who is reasonably identifiable':

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

'Related Companies' has the same meaning as related bodies corporate and the meaning in section 50 of the Corporations Act 2001 (Cth). 'You' and 'Your' refers to Our customers and prospective customers. It also refers generally to users of Our websites.

### Types of Personal Information We collect

The Personal Information we collect depends on the products and services we offer you or you use or apply for. Typically the details we collect and hold include your name, contact details (address, phone and email address), and date of birth. Third parties are prohibited from using your personal information for purposes other than those for which it is supplied.

### Why We collect Your Personal Information

We collect Personal Information to provide, offer and administer our various products and services, or otherwise as permitted by law. Such purposes include responding to your enquiries, providing you with assistance you request of us, maintaining and administering our products and services ; providing you with marketing information regarding other products and services (of ours or a third party); quality assurance and training purposes; performing administrative operations any other purposes identified at the time of collecting Your information. If you do not consent to us collecting and using all or some of the Personal Information we request, we may not be able to provide you with our products or services. It may also prevent us from maintaining or administering your policy or the provision of information regarding our products or services or those of any third party.

### How We collect Your Personal Information

We collect your Personal Information from you in various ways and at several different points, including via telephone, our website, hard copy forms or email. Unless it is unreasonable or impracticable for us to do so, we collect your Personal Information directly from you. There may, however, be occasions where we collect your Personal Information from someone else. This may include our distributors or referrers, agents or Related Companies, service providers, another party involved in a claim, family members, anyone you have authorised to deal with us on your behalf, and/or our legal or other

advisers. If you provide Personal Information to us about another person, we rely on you to have made or make them aware that you will, or may, provide their information to us and the types of third parties we may provide it to, the relevant purposes we and any of the third parties will use it for and how they can access it. If you have not done, or will not do, either of these things, you must tell us before you provide the relevant Personal Information.

### **Sharing and Disclosing Your Personal Information**

We never sell, rent or trade Your Personal Information. We may share your Personal Information with our related companies and other third parties who provide services to us or on our behalf. We will not share your Personal Information with any unrelated party except under the following circumstances:

- in accordance with this Privacy Policy;
- as provided in any collection notice we give you;
- where you have provided your consent – which may be given expressly or may reasonably be implied by your conduct or our existing business relationship;
- for purposes related to: research, planning, service development, security, testing and risk management;
- where a product or service you apply for is provided or supplied by or through a third party;
- where a third party, such as a mailing house, carries out activities on our behalf;
- if disclosure is otherwise required in order to provide you with a particular product or service;
- in order to ensure our ability to continue providing products and services;
- if disclosure is required for the purposes of conducting business analysis in order to improve our products and services;
- if disclosure is required by law or requested by statutory, regulatory or ombudsman authorities or law enforcement agency;
- to an insurance broker or agent acting on your behalf or who you have designated to act on your behalf;
- Our professional advisors including our accountants, auditors and lawyers, contracted advisors and service providers;
- Where a third party acquires, or considers acquiring, an interest in us;
- Where we are authorised, required or permitted by law to use or disclose information;

By proceeding to acquire our services and products you agree that you cannot seek redress under the Act or against us (to the extent permitted by law). Related and unrelated third parties to whom your Personal Information is disclosed are required to keep the information confidential and only use it for the same purposes we are permitted to use it.

### **Quality and Security of Your Personal Information**

We aim to ensure that your Personal Information is accurate, complete and up to date. During the course of your relationship with us we will ask you to inform us of any changes to your Personal Information. You should however contact us at any time to update your Personal Information or advise us that the information we have is not accurate or complete.

We are committed to keeping your Personal Information secure and will use all reasonable precautions to protect it from loss, misuse, interference and unauthorised access, modification or disclosure including:

- physically securing external and internal premises;
- maintaining computer and network security such as user identifiers and passwords to control access to computer systems;

- restricting access to your Personal Information to employees or those who perform services on our behalf who are authorised to handle your Personal Information and on a 'needs to know' basis;
- entering into confidentiality agreements with relevant employees and third parties; • appropriate training of staff;
- retaining your Personal Information for no longer than it is reasonably required to service a policy or continue to provide any products and services to you, unless we are required by law to retain it for longer;
- taking reasonable steps to destroy personal Information that We no longer require or which was unsolicited and We identify that we would not have otherwise collected it from You.

#### **Access to and correction of Your Personal Information**

You may generally access the information we hold about you and request corrections. This right is, subject to the exceptions detailed in the Australian Privacy Principles. For example, we may refuse access where the:

- information may have an unreasonable impact on the privacy of others; • request is frivolous or vexatious;
- information relates to existing or anticipated legal proceedings and would not be accessible by the process of discovery in those proceedings;
- information would reveal our intentions in relation to negotiations in such a way as to prejudice those negotiations.

If we refuse you access, or to give access in the manner requested by you, we will let you know why in writing. Where providing access would reveal evaluative information in connection with a commercially sensitive decision-making process, we will provide an explanation for the decision rather than direct access to the information. In most cases, you may access your Personal Information at no cost to you by contacting our privacy officer at [info.vasfs@gmail.com](mailto:info.vasfs@gmail.com) or in person at Level 1/5 Everage Street, Moonee Ponds VIC 3039 or call our privacy officer on 0424 850 786. In all cases you will be asked to verify who you are before your Personal Information is provided. All requests for Personal Information will be handled in a reasonable period of time.

#### **How to contact Us about Privacy**

If you have any questions, suggestions or complaints about our privacy practices (including a complaint about a breach of the Privacy Act or Australian Privacy Principles) or this Privacy Policy, you can either email our privacy officer at [info.vasfs@gmail.com](mailto:info.vasfs@gmail.com) or write to VAS Financial Pty Ltd, Level 1/5 Everage Street, Moonee Ponds VIC 3039 or call our privacy officer on 0424 850 786.

We will respond to your question, suggestion or complaint as soon as possible. If you are not satisfied with our response to your enquiry or complaint you can contact the Privacy Officer and request that it be reviewed by a senior staff member who will endeavour to resolve your dispute within 30 days. If you are still not satisfied we will tell you about any external dispute resolution avenues which may be available to you.

You can obtain information on privacy issues in Australia by visiting the Office of the Australian Information Commissioner's website located at [www.oaic.gov.au](http://www.oaic.gov.au) or by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or by calling at 1300 363 992

Dated: December 2023