

# **Privacy Policy for Clients, Insureds and Claimants**

Please read this Privacy Policy carefully. It describes how Richard Oliver Underwriting Managers Pty Ltd ("ROUM") handles personal information about You which ROUM collects in connection with the services ROUM provides. It also explains certain legal rights You have in connection with Your personal information which is handled by ROUM. This Privacy Policy may be revised from time to time to reflect changes in law or changes in ROUM's business operation. This Privacy Policy was last updated on 1 August 2021.

## 1 What is the purpose of this Privacy Policy, and does it apply to me?

This Privacy Policy explains how **ROUM** handles personal information about **You**. Generally speaking, this Privacy Policy will apply to **You** if **You** directly or indirectly benefit from the services **ROUM** provides (typically insurance-related) in Australia.

- 1.1 In many countries around the world (including Australia), there are laws that require organisations that handle personal information to comply with certain legal requirements, including the requirement to be open and transparent about the way in which personal information is handled.
- 1.2 Whilst **ROUM's** core business offerings are specialist lines of commercial insurance and **ROUM** does not handle as much personal information as insurers/brokers who handle personal insurance for individual clients (e.g. motor or household policies) do, **ROUM** still needs to handle personal information.
- 1.3 The purpose of this Privacy Policy is to inform **You** how **ROUM** handles personal information about **You** which **ROUM** might obtain in connection with its business activities. This Privacy Policy will apply to **You** if **ROUM** obtains **Your** personal information in connection with **ROUM's** business activities.
- 1.4 Please note that this Privacy Policy does not apply to **You** if **You** are an employee, contractor, or any other type of worker engaged by **ROUM**.
- 1.5 Nothing in this Privacy Policy alters any existing relationship between **You** and **ROUM**, or creates any new relationship between **You** and **ROUM**. Nothing in this Privacy Policy affects any right **You** have under any applicable law which regulates the way in which **ROUM** handles **Your** personal information.

### Who at ROUM is responsible for the handling of my Personal Information?

2.1 The company responsible for the proper handling of **Your** personal information is **ROUM**, whose details are as follows:

Richard Oliver Underwriting Managers Pty Ltd Level 4 555 Bourke Street Melbourne VIC 3000 Australia

ACN: 006649341 ABN: 66 006 649 341



2.2 **ROUM** is a leading provider of professional and innovative insurance and risk management solutions. Further information regarding **ROUM's** business can be found on **ROUM's** website at <a href="http://www.roum.com.au/">http://www.roum.com.au/</a>.

#### 3 What Personal Information about me does ROUM collect?

Personal information collected by **ROUM** will vary depending on many factors, but may include a broad range of personal information, including personal information of a sensitive nature such as details of **Your** bank account, finances, and information concerning **Your** health.

- 3.1 The type and amount of personal information about **You** which **ROUM** collects will vary depending on various factors, including **Your** personal circumstances, the nature of **Your** relationship with **ROUM** (or **ROUM's** client), and the relevant services provided by **ROUM**, but may include any combination of the following:
  - 3.1.1 **Your** contact details such as name, postal address, email address, and telephone number:
  - 3.1.2 **Your** gender, date/place of birth, marital status, dependents, nationality, country of residence, occupation, hobbies, habits, and other similar demographic information;
  - 3.1.3 **Your** unique identifiers such as bank account number, credit card number, tax file number, passport number, and driver's licence number;
  - 3.1.4 Information about **Your** finances, such as details of **Your** income, assets, investments, debts, creditworthiness, tax status, and existing pension/insurance arrangements;
  - 3.1.5 Information about **Your** physical and mental health, including **Your** medical history, description of illness or injury suffered, and any specific treatment received;
  - 3.1.6 Information about **You** which **ROUM** is obliged to check for legal or regulatory reasons, such as information relating to **Your** identity, any directorship of companies **You** hold, and **Your** criminal history (including allegations of crimes);
  - 3.1.7 Other information about **You** which **ROUM** handles in connection with the services **ROUM** provides to **You** or a client of **ROUM**, such as **Your** personal circumstances that need to be described in arranging any insurance for **You** or a client of **ROUM**, details of incidents giving rise to any insurance claim in which **You** are involved, and facts and circumstances involving **You** in respect of which **ROUM** is asked to advise a client; and
  - 3.1.8 Other information about **You** which **ROUM** collects as part of its day-to-day business operation, such as information about **Your** visit to **ROUM's** office, **Your** attendance at meetings and events hosted by **ROUM**, and **Your** correspondence with **ROUM's** brokers and advisors.
- 3.2 Please note that personal information which **ROUM** collects may include sensitive information such as **Your** racial/ethnic origin, religious/philosophical/political views or affiliations, membership of trade union or professional/trade association, sex life, criminal record, and health. **ROUM** will collect **Your** personal information only if and to the extent it is necessary for one or more of the purposes described in Section 4 below.

#### 4 Why does ROUM collect my Personal Information?

**ROUM** collects personal information mainly to provide its services (e.g. to arrange insurance, to handle insurance claims, or to provide risk management advice), but **ROUM** also collects personal information for a variety of other related business purposes.



- 4.1 **ROUM** collects and uses **Your** personal information primarily for the following purposes:
  - 4.1.1 to provide services which **You** personally request (e.g. where **You** request **ROUM** to arrange insurance for **Your** own business purpose, including where such request is made indirectly through another broker);
  - 4.1.2 to provide services which **You** did not personally request but is nevertheless arranged for **Your** benefit (e.g. where a client of **ROUM** requests **ROUM** to arrange any insurance which might directly or indirectly benefit **You**, including where such request is made indirectly through another broker); and
  - 4.1.3 to provide services which **You** did not personally request but were requested by **ROUM's** client and requires **ROUM** to interact, directly or indirectly, with **You** (e.g. where **You** bring a claim against **ROUM's** client and **ROUM** is required to handle the claim under the relevant insurance policy).
- 4.2 **ROUM** also collects and uses **Your** personal information for the following related purposes:
  - 4.2.1 to enable underwriters, actuaries, insurers, reinsurers, other brokers, claims handlers, surveyors, loss adjustors/assessors, accident investigators, specialist risks advisors, banks and other lenders (including premium finance providers), health professionals, lawyers, accountants, auditors, consultants, and other like third party professional advisors and service providers to provide their services (to the extent their involvement is inherent in or necessary in connection with the services provided by **ROUM**):
  - 4.2.2 to enable affiliates of **ROUM** and non-affiliated third party services providers (e.g. IT services providers, administrative support service providers, etc.) to provide services that directly or indirectly support **ROUM's** business operation and the services provided by **ROUM**;
  - 4.2.3 to comply with legal or regulatory requirements imposed on **ROUM** or a client of **ROUM** (including the requirement to conduct 'Know-Your-Client' checks, antimoney laundering/sanctions screening, and other like due diligence checks);
  - 4.2.4 to improve or develop the products and services **ROUM** provides to its clients in general (e.g. improving internal business processes, providing analysis on trends in the insurance market, benchmarking insurance products, devising ways to simplify/streamline the insurance placement process or claims handling process, designing new types of insurance products, etc.); and
  - 4.2.5 to contact **You** and generally maintain the relationship between **You** and **ROUM** in connection with the services provided by **ROUM**, and to keep **You** informed about the products and services offered by **ROUM** which might be of interest or benefit to **You**.
- 4.3 For the purpose of improving or developing **ROUM's** products and services (see Section 4.2.4 above), **ROUM** may use **Your** personal information to create and analyse statistical data, and the outcome of such analysis might be shared with third parties. However, such analysis will be conducted solely on an aggregated and anonymous basis and under no circumstance will any specific personal information relating to **You** or any information from which **You** could be identified be included in such analysis.
- Your personal information will be used for relationship maintenance/marketing purpose (see Section 4.2.5 above) only if You are Yourself a client of ROUM or if You are the business contact at ROUM's client (i.e. You fall within the category of persons described in Section 5.2.1 or 5.2.2 below). For further information regarding ROUM's direct marketing practice, please refer to Section 7 below.



4.5 Please note that **ROUM** will never use **Your** personal information for any purpose not described above without **Your** prior consent (or the prior consent of the relevant client of **ROUM**, where applicable).

#### 5 How does ROUM obtain my Personal Information?

Personal information handled by **ROUM** is typically provided by a client of **ROUM**. However, depending on the circumstances, **ROUM** might collect personal information from other third parties who are relevant to the services **ROUM** provides, and **ROUM** might also collect personal information directly from **You**.

- 5.1 Where **ROUM** is required to handle **Your** personal information, **ROUM** generally obtains **Your** personal information indirectly from a client of **ROUM** (typically a company, partnership, public authority, or other like body corporate) which receives services that affect **You**. For example, **ROUM** might indirectly receive **Your** personal information from a client of **ROUM** where the client asks **ROUM** to:
  - 5.1.1 arrange any insurance that benefits the client's directors, officers, employees, customers, guests, visitors, or other persons that interact with the client;
  - 5.1.2 handle claims made against the client under any insurance policy;
  - 5.1.3 advise the client on the management of its business risks and insurance arrangements; or
  - 5.1.4 manage any aspect of the client's business affairs on behalf of the client (e.g. in connection with the set-up and operation of a captive insurance programme);
- 5.2 Occasionally, it will be necessary for **ROUM** to obtain **Your** personal information directly from **You**. For example, this could be the case where:
  - 5.2.1 You are employed or otherwise engaged by a client of ROUM and Your job involves any direct interaction with ROUM (e.g. if You are a Risk Manager or a Finance Director of a client of ROUM, and You are involved in making insurance purchase decisions):
  - 5.2.2 You directly interact with ROUM as a client of ROUM in respect of Your own business, profession, or trade (e.g. where You act as a sole trader, sole practitioner, or business proprietor and receive ROUM's services in connection with Your business needs):
  - 5.2.3 You are an individual to be insured by a client of ROUM or a beneficiary of any insurance a client of ROUM arranges for Your benefit and ROUM is required to collect Your personal information directly from You in order to make the necessary arrangements for ROUM's client;
  - 5.2.4 **You** bring any insurance claim against a client of **ROUM** and where **ROUM** is involved in the direct handling of such claim; or
  - 5.2.5 **ROUM** needs to talk to **You** or correspond with **You** in order to provide risk management consultancy or other like advisory services to **ROUM's** clients.
- 5.3 Depending on the circumstances, **ROUM** may also obtain **Your** personal information from other sources such as:
  - 5.3.1 publicly accessible registers and databases (such as registers of companies/directors, bankruptcy, and court judgments), credit reference agencies, providers of identity verification services, providers of insurance claims validation services, operators of insurance fraud and other business risk screening databases, and other like providers of due diligence services; and



- 5.3.2 underwriters, actuaries, insurers, reinsurers, other brokers, claims handlers, surveyors, loss adjustors/assessors, accident investigators, specialist risks advisors, banks and other lenders (including premium finance providers), health professionals, lawyers, accountants, auditors, consultants, and other like third party professional advisors and service providers, as well as third parties that have referred **You** to **ROUM** and other like third parties who interact with **ROUM** in connection with the services **ROUM** provides.
- 6 Do I have to give my Personal Information to ROUM or allow ROUM to handle my Personal Information?

**You** do not have to provide personal information requested by **ROUM**, and **You** do not have to allow **ROUM** to handle **Your** personal information. However, such refusal can potentially disadvantage **You** and additionally, **ROUM** might handle **Your** personal information regardless of **Your** wishes where the law allows **ROUM** to do so.

- 6.1 It is not mandatory for **You** to provide any personal information **ROUM** asks **You** to provide or for **You** to consent to **ROUM** handling **Your** personal information in any particular way. **You** can also at any time revoke any consent **You** give in respect of the processing of **Your** personal information by **ROUM** if **You** change **Your** mind.
- 6.2 However, if **You**:
  - 6.2.1 refuse to provide **Your** personal information which **ROUM** requests;
  - 6.2.2 do not consent to **ROUM** handling **Your** personal information in accordance with this Privacy Policy; or
  - 6.2.3 revoke any consent regarding the handling of **Your** personal information by **ROUM You** have previously given,

then such refusal or revocation of previously given consent might prevent **ROUM** from performing its services, and this might in turn, depending on **Your** circumstances, adversely affect **You** (e.g. through delays in placement of insurance or assessment/payment of insurance claims).

- 6.3 Please note that due to the nature of services **ROUM** provides and the relevant legal and regulatory requirements that govern them, **ROUM** is unlikely to be able to deal with **You** if **You** refuse to properly identify **Yourself** or if **You** insist on using pseudonym in dealing with **ROUM**.
- 6.4 If **You** consent to the collection and processing of **Your** personal information by **ROUM** but later revoke **Your** consent, **ROUM** will endeavour to comply with **Your** request but there may be circumstances where **ROUM** will not be able to comply with **Your** request (e.g. if **You** revoke **Your** consent to the disclosure of **Your** personal information to third parties, **ROUM** will not be able to 'undo' a disclosure that has already taken place).
- 6.5 Additionally, where there is a relevant legal exemption that applies to the way in which **ROUM** collects and processes **Your** personal information, **ROUM** reserves the right to rely on such legal exemption to collect and process **Your** personal information regardless of **Your** wishes but only if and to the extent it is necessary to do so for one or more of the purposes described in Section 4 above (e.g. where **ROUM** is required by law to validate **Your** identity for fraud prevention purpose or compelled by law to disclose **Your** personal information to regulators or law enforcement agencies, or where **ROUM** would otherwise be prevented from providing the services as requested by **ROUM's** client).

#### 7 Does ROUM use my Personal Information for Marketing?

**ROUM** does not engage in direct marketing that targets consumers in general. However, depending **Your** relationship with **ROUM**, **You** might receive marketing communications from **ROUM**. Where this is the case, **ROUM** will always respect **Your** marketing preference.



- 7.1 **ROUM** does not engage in direct marketing activities that target consumers in general, but if **You** are **Yourself** a past or current client of **ROUM** (or a prospective client referred to **ROUM** by a third party), or if **You** are a **ROUM's** business contact at a past, current, or prospective client of **ROUM**, **You** might from time to time receive marketing communications from **ROUM**, e.g. information regarding a new product or service offered by **ROUM**, or invitation to a seminar or conference hosted by **ROUM** which might be of interest to **You** (see Section 4.4 above).
- 7.2 Where **ROUM** sends any such marketing communication to **You**, **ROUM** will ensure that such marketing communications are sent in compliance with the applicable laws, and in particular, ensure that there is an easy way for **You** to stop receiving (i.e. "opt-out" from) such marketing communications in the future.
- 7.3 **ROUM** will also comply with any applicable law that specifically regulates the use of **Your** personal information for direct marketing purposes, including any applicable rules concerning the use of a 'Do-Not-Call' registry or similar facility.
- 7.4 **ROUM** will never sell, rent, or otherwise share **Your** personal information with operators of marketing databases, or any other non-affiliated third party solely for such third party's own marketing purposes without **Your** prior consent (or the prior consent of the relevant client of **ROUM**, where applicable). For further clarification regarding how **ROUM** shares **Your** personal information with third parties, please see Section 8 below.
- 8 Does ROUM share my Personal Information with third parties?

**ROUM** shares personal information with third parties mainly to provide its services (e.g. to arrange insurance, to handle insurance claims, or to provide risk management advice), but **ROUM** also shares personal information for a variety of other related business purposes.

- 8.1 **ROUM** will share **Your** personal information with third parties only if and to the extent it is necessary and appropriate for one or more of the purposes set out in Section 4 above. Specifically, **ROUM** may share **Your** personal information with the following types of third parties:
  - 8.1.1 underwriters, actuaries, insurers, reinsurers, other brokers, claims handlers, surveyors, loss adjustors/assessors, accident investigators, specialist risks advisors, banks and other lenders (including premium finance providers), health professionals, lawyers, accountants, auditors, consultants, and other like third party professional advisors and service providers, as well as third parties that have referred **You** to **ROUM** (to the extent their involvement is inherent in or necessary in connection with any of the services provided by **ROUM**);
  - 8.1.2 clients of **ROUM** who receive services which is arranged for **Your** benefit, or otherwise requires **ROUM** to interact, directly or indirectly, with **You** (to the extent sharing of **Your** personal information with such clients is necessary and appropriate in the context of the relevant services **ROUM** provides, see Section 4.1.2 and Section 4.1.3 above such a client may, depending on the circumstances, be **Your** employer);
  - 8.1.3 affiliates of **ROUM** and non-affiliated third party services providers (e.g. IT service providers, administrative support service providers, etc.) that provide services that directly or indirectly support **ROUM's** business operation and the services provided by **ROUM**;
  - 8.1.4 credit reference agencies, providers of identity verification services, providers of insurance claims validation services, operators of insurance fraud and other business risk screening databases, and other like providers of due diligence services (to the extent necessary to comply with legal or regulatory requirements imposed on **ROUM** or a client of **ROUM**); and



- 8.1.5 regulators, police, courts/tribunals, and other like public authorities who have jurisdiction over **ROUM** (to the extent necessary to comply with any legal or regulatory requirements imposed on **ROUM** or a client of **ROUM**).
- 8.2 Please note that where **ROUM** shares **Your** personal information with regulators, police, courts/tribunals, and other like public authorities, **ROUM** may, depending on the circumstances, be forbidden from advising **You** (or the relevant client of **ROUM**) of the fact that **Your** personal information was disclosed to or requested by such third parties.
- 8.3 In all other cases, **ROUM** will not share **Your** personal information with other third parties without **Your** prior consent (or the prior consent of the relevant client of **ROUM**, where applicable) unless **ROUM** has a legal ground on which to do so (e.g. where any applicable law requires **ROUM** to do so, or where **ROUM** is compelled to do so by a court order).

#### 9 Does ROUM transfer my Personal Information overseas?

Due to the international nature of **ROUM's** business operation and the insurance market in which **ROUM** operates, **Your** personal information may be shared with third parties that are located in countries that do not have laws that protect personal information in the same way laws of Australia do.

- 9.1 Due to the global nature of **ROUM's** business operation, and the complex and international nature of the many specialist lines of insurance **ROUM** handles, **ROUM** may need to transfer **Your** personal information across international borders to destinations where the law governing the protection of **Your** personal information may not be equivalent to the law that applies in Australia.
- 9.2 **Your** personal information may be transferred across international borders by **ROUM** to affiliates of **ROUM** and non-affiliated third parties described in Section 8.1 above, who could be located anywhere in the world. As a minimum, such third party recipients based overseas will include affiliates of **ROUM** that are based in the UK, USA, Philippines and India (who provide IT systems support and administrative/operational support to **ROUM**).
- 9.3 Please note that where ROUM shares Your personal information with ROUM's affiliates or any other third party located overseas, Your personal information will be shared only to the extent it is necessary to allow such overseas recipients to perform their relevant task. Some overseas recipients might receive all of Your personal information (e.g. ROUM's affiliates that supports ROUM's IT systems) whilst some overseas recipients will only receive limited amount of Your personal information (e.g. those who assist ROUM in performing ID verification etc. will typically only receive basic personal information such as name and date of birth).
- 9.4 Whenever **ROUM** transfers **Your** personal information across international borders, **ROUM** will take all appropriate steps that are within **ROUM's** control to take so as to ensure that such transfer complies with the applicable legal requirements.

#### 10 How will my Personal Information be kept by ROUM?

**ROUM** will keep most of **Your** personal information in electronic form (typically on IT systems maintained by **ROUM's** affiliates), although some of **Your** personal information could be kept in paper form. **ROUM** will keep **Your** personal information for as long as there is a need for **ROUM** to keep **Your** personal information for one or more of the purposes **Your** personal information was originally collected. **Your** personal information will be handled by **ROUM** securely at all times.

10.1 Most of the personal information **ROUM** collects will be entered into and held by the relevant parts of the IT systems used by **ROUM** (such as client relationship management system, email system, broking system, or accounting system). Such IT systems are typically operated and supported by affiliates of **ROUM** that are located in the UK, USA, and India, but certain specialist IT systems are maintained by third party service providers.



- 10.2 Some personal information **ROUM** collects will be kept in paper form (e.g. where **Your** personal information is included in forms, letters, or files and notes kept by **ROUM's** brokers and advisors, etc.). However, depending on the circumstances, **ROUM** might destroy the paper copies after they have been scanned into **ROUM's** IT systems. Personal information held in paper form will ordinarily be kept on **ROUM's** premises until it is moved to document archives operated third party service providers.
- 10.3 Whether it exists in electronic form or paper form, **Your** personal information will be retained by **ROUM** for as long as they are required for one or more of the purposes specified in Section 4. Please note that for legal and regulatory reasons, **ROUM** will often need to retain **Your** personal information even after **ROUM** stops performing the relevant services which requires **ROUM** to handle **Your** personal information.
- 10.4 In particular, please note that due to the way in which insurance works, **ROUM** may need to retain **Your** personal information for long periods. For example, if **ROUM** arranges an insurance which provides cover for *incidents that take place during the term of the policy* as opposed to cover for *claims that are made during the term of the policy*, then **ROUM** may need to keep the relevant records (including personal information) for many years even after the policy is terminated, because a valid claim can potentially be made many years after such a policy has expired.
- 10.5 Please be assured that **ROUM** treats information security very seriously. Regardless of how **Your** personal information is kept, the privacy and confidentiality of **Your** personal information under **ROUM**'s control will be protected in accordance with the strict standards which applies to **ROUM** and all of **ROUM**'s affiliates, and is enforced by a dedicated team of experienced security experts.
- 10.6 Encryption, anti-malware, firewalls, back-up/disaster recovery systems, restriction of access to premises/IT systems, careful selection of personnel as well as relevant third party service providers, and other technical and organizational measures as appropriate will be used to prevent and detect unauthorized or accidental access, loss, disclosure, or other like incident that might affect **Your** personal information, regardless of whether **Your** personal data is held physically or electronically.
- 10.7 In the unlikely and unfortunate event Your personal information under ROUM's control becomes compromised due to any information security breach (e.g. unauthorised access, loss, or disclosure/alteration, including where this is caused by contractors), ROUM will act promptly to identify the cause of such information security breach, and remediate and mitigate the consequences of such information security breach. Where appropriate, ROUM will also notify You (and/or the relevant client of ROUM, where applicable) in accordance with any applicable law which requires ROUM to notify You about such incidents.

#### 11 Does ROUM monitor my interaction with ROUM in any way?

To ensure the secure handling of **Your** personal information and to comply with the relevant legal and regulatory requirements, **ROUM** records and monitors access to its facilities and premises, and in some cases, communications between **You** and **ROUM's** brokers and advisors as well.

- 11.1 If **You** telephone **ROUM**, **Your** telephone conversation with **ROUM's** brokers and advisors may be recorded for training, quality monitoring, and regulatory compliance purposes. Where this is the case, **You** will be given a separate notice about such recording when **You** telephone **ROUM**.
- 11.2 If **You** personally visit any of **ROUM's** office, **Your** access to and use of **ROUM's** premises and facilities may, depending on the location of the **ROUM** office, be subject to monitoring via CCTV systems for safety and security reasons.
- 11.3 **ROUM** also has the capability to monitor the use of its facilities and IT systems by its staff and visitors in general (including access to restricted areas within **ROUM's** premises, use of WiFi



facility **ROUM** makes generally available to clients, etc.). **ROUM** may make use of such additional monitoring capability to monitor **Your** access to **ROUM's** premises, facilities, and IT systems (or **Your** correspondence with **ROUM's** staff) where this is considered necessary in order to protect the reputation, assets, and confidential/proprietary information, as well as safety/well-being of **ROUM's** clients, workforce, and other stakeholders. Such monitoring forms part of the information security measures deployed by **ROUM** (as described in Section 10 above).

#### 12 Will this Privacy Policy change in the future?

- 12.1 This Privacy Policy was last updated on 1 August 2021. This Privacy Policy may be amended from time to time to reflect changes in law or changes in **ROUM's** business operation, but where such revision becomes necessary in the future, **ROUM** will notify **You** to the extent it is practicable for **ROUM** to do so.
- 12.2 If **You** are a client directly serviced by **ROUM**, **You** will be notified directly about changes to this Privacy Policy but if **You** are a customer or employee of a corporate client serviced by **ROUM** (or a claimant bringing claims against such a client of **ROUM**), it may not be practicable for **ROUM** to notify **You** directly of changes to this Privacy Policy, although **ROUM** will notify its corporate clients about any changes to this Privacy Policy.
- 12.3 As a minimum, changes to this Privacy Policy will be publicised on ROUM's website at <a href="http://www.roum.com.au/">http://www.roum.com.au/</a> (through a link to 'Privacy Notice' that appears in the 'Important Notices' section of the website).

#### 13 Who can I contact about my Personal Information?

If **You** wish to exercise **Your** legal right to access/correct **Your** personal information, or if **You** have any query or complaint regarding the handling of **Your** personal information by **ROUM**, please contact **ROUM** in the first place.

13.1 Under Australia's Privacy Act 1988, **You** have the legal right to access **Your** personal information held by **ROUM** and to ask **ROUM** to correct or delete **Your** personal information (e.g. where it is inaccurate or out-of-date). If **You** would like to exercise this right, or if **You** have any query or complaint regarding the way in which **Your** personal information is handled by **ROUM**, please contact:

Complaints Manager Richard Oliver Underwriting Managers Pty Ltd Level 4 555 Bourke Street Melbourne VIC 3000 Australia

Telephone: (02) 9285 4000

Email: complaints.au@richardoliver.com

- 13.2 Please note that **Your** right to access and correct/delete **Your** personal information could be subject to certain legal exemptions, and where any legal exemption applies, **ROUM** might not be able to comply with **Your** request to access or correct/delete **Your** personal information.
- 13.3 **ROUM** will endeavour to respond satisfactorily to **Your** request to access or correct/delete **Your** personal information, or any question or concern **You** may have regarding **Your** personal information. If **You** are dissatisfied with **ROUM's** response, **You** can complain to **ROUM** (please see Section 13.1), and **Your** complaint will be addressed in accordance with **ROUM's** Complaints Handling Procedure, a summary of which is accessible on ROUM's website at <a href="http://www.roum.com.au/">http://www.roum.com.au/</a> (through a link to 'ROUM Complaints and Disputes Policy' that appears in the 'Important Notices' section of the website).



13.4 If **Your** complaint cannot be resolved satisfactorily through **ROUM's** Complaints Handling Procedure, or if **You** wish to learn more about **Your** rights under Australia's Privacy Act 1988, **You** can contact:

Office of the Australian Information Commissioner Level 3 175 Pitt Street Sydney 2000 Australia http://www.oaic.gov.au/

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au