JenBro Insurance

JenBro policy

Privacy Policy.

What we collect, why we collect it, who we share it with, and how to reach us.

In this Privacy Policy, 'we', 'us' and 'our' means JenBro Insurance.

We respect the privacy of your personal information. This Privacy Policy sets out how we collect, store, use and disclose your personal information, which we do in accordance with the Privacy Act 2020.

01 What personal information we collect

In New Zealand, under the Privacy Act 2020, "personal information" means information about an identifiable individual. We collect certain types of personal information about you, including:

- **Insurance information:** information in relation to applications for, provision and administration of insurance, such as employment details, health information, details of previous insurances and past insurance claims, criminal records and information required for provision of insurance policy(s) or insurance premium funding.
- **Contact information:** name, phone number, email address and physical address
- **Identity information:** Date of birth, passport details, drivers licence details
- **Financial information:** financial, billing and invoicing information
- if you visit our website, we will collect personal information that you submit, such as via online forms; and
- any other personal information you otherwise provide to us.

If you do not provide us with the information that we need, we or any of our third-party service providers may not be able to provide you with products or services.

02 How we collect your personal information

We may collect personal information in several ways, including:

- directly from you via our website, telephone, in writing or email; and/or
- indirectly from third parties.

You authorise us to contact such third parties for the purposes of providing you with the information or services that you have requested.

Indirect source	Types of personal information	Purpose of collection
Your employer	Insurance Information, Contact Information, and Identity Information.	To contact you and provide you or your employer with services, including to review applications for, provision, and administration of insurance.
Insurers, reinsurers, underwriters or premium funders	Insurance Information, Contact Information and Identity Information	To review applications for, provision, administration and invoicing of insurance.
Creditors, credit reporting agencies and collection agencies	Insurance Information, Contact Information, Identity Information and Financial Information	To review applications for, provision, administration and invoicing of insurance and reinsurance.
Financial advisers or authorised representatives	Insurance Information, Contact Information, Identity Information and Financial Information	To contact you and provide you with services, including to review applications for, provision, administration and invoicing of insurance.
Recruiters or referees	Insurance Information, Contact Information and Identity Information	To assess your application and suitability for a role with us.

We may also indirectly collect personal information from third parties not listed in the table above. This will be where authorised by you, as required or authorised by law, or from sources that make that information publicly available.

03 Our purposes for using and disclosing your personal information

We use and disclose your personal information for the purposes of providing our services to you and related purposes. Such purposes include:

- assessing and managing your insurance application and policy;
- managing and processing payments;
- communicating with you about our products and services;
- conducting market or customer research;
- administering claims;
- developing, establishing and administering alliances and other arrangements with other organisations in relation to the promotion, administration and use of our services;
- telling you about our other service offerings which we believe may be relevant (if you have requested to receive this);
- statutory or regulatory reporting;
- internal or external audit; and
- any other purpose notified to you at the time your personal information is collected.

04 Disclosure of your personal information

We will disclose your personal information to:

- insurers, reinsurers, other insurance intermediaries, insurance reference bureaus and industry bodies;

- assessors appointed by insurers to assess or investigate your claims;
- others named on your policy as co-insureds;
- service providers engaged to provide services to you in relation to your insurance (such as providing repairs);
- third parties who help manage our business and provide our services, including our third party service providers, such as payment system operators, IT suppliers, lawyers, accountants, other advisers and financial institutions;
- any other entities notified to you at the time of collection; and
- courts, law enforcement, regulators and other government agencies to comply with all applicable laws, regulations and rules.

Other than when required or permitted by law, as specified in this Privacy Policy or where you have provided your consent, we will not disclose your personal information.

Where we disclose your personal information to a third party, it will collect, store, use and disclose your personal information in accordance with its privacy policy.

Fire and general insurance companies

The privacy policy of each member of the Insurance Council of New Zealand is available at ibanz.co.nz/Privacy-Statements/10642.

Life and health insurance companies we work with

Fidelity Life	**Fidelity Life privacy statement**
AIA	**AIA NZ privacy statement**
nib	**nib NZ privacy policy**
UniMed	**UniMed privacy statement**

Please let us know if you would like further information about the specific insurance provider that we disclose your information to.

Nothing in this Privacy Policy prevents us from using and disclosing to others de-personalised aggregated data.

05 Transfer of personal information overseas

We may disclose your personal information to third party service providers and/or insurers who may process your personal information either on our behalf or otherwise for one or more of the above-stated purposes.

Some of the third party service providers to whom we disclose personal information are located in countries outside New Zealand. In this regard, unless exempted by the Privacy Act 2020, we would have sought your express authorisation to do so prior to the transfer of your personal information overseas. Overseas disclosure of your personal information will only be made for one or more of the purposes specified in this Privacy Policy.

We will take appropriate steps to ensure that transfers of personal information are in accordance with applicable law and carefully managed to protect your privacy rights, such as by ensuring disclosures are limited to recipients who are subject to privacy laws which are recognised as providing a comparable level of legal protection as the Privacy Act 2020 or where we can be satisfied that alternative arrangements are in place to protect your privacy rights.

06 Your obligations when you provide personal information of others

You must not provide us with personal information of any other individual unless you have the express authorisation of that individual to do so. If you do provide us with such information about another individual, before doing so you:

- must tell that individual that you will be providing their information to us and that we will handle their information in accordance with this Privacy Policy;
- must provide that individual with a copy of (or refer them to) this Privacy Policy; and
- warrant that you have that individual's consent to provide their information to us.

If you have not done this, you must tell us before you provide any third party information.

07 Your obligations when we provide you with personal information

If we give you, or provide you access to, the personal information of any other person, you must only use it:

- for the purposes we have agreed to; and
- in compliance with applicable privacy laws (including the Privacy Act 2020) and this Privacy Policy.

You must also ensure that your agents, advisers, employees and contractors meet the above requirements.

08 Accuracy, access and correction of your personal information

We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date whenever we collect, use or disclose it. However, we also rely on you to advise us of any changes to your personal information.

Please contact us using our contact details below as soon as possible if there are any changes to your personal information or if you believe the personal information we hold about you is not accurate, complete or up-to-date.

You can make a request to access your personal information or to have it corrected by contacting us using the contact details below. If you make an access request, we will provide you with access to the personal information we hold about you unless otherwise required or permitted by law. We will notify you of the basis for any denial of access to your personal information. We may charge a fee where permitted by law.

09 Security of your personal information

We take reasonable steps to protect any personal information that we hold from misuse, interference and loss, and from unauthorised access, alteration and disclosure. However, data protection measures are never completely secure and, despite the measures we have put in place, we cannot guarantee the security of your personal information. You must take care to ensure you protect your personal information. You should notify us as soon as possible if you become aware of any security breaches. Where required by law, we will notify you of any notifiable privacy breach concerning your personal information.

10 Updates to this Privacy Policy

We reserve the right to amend our Privacy Policy from time to time to ensure we properly manage and process your personal data.

11 How to make a complaint

If you wish to make a complaint about a breach of this Privacy Policy or any breach of applicable privacy laws, you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint together with any supporting evidence and information. You can also complain to the Privacy Commissioner (see www.privacy.org.nz).

12 How to contact us

If you wish to gain access to your personal information, want us to correct or update it, have a complaint about a breach of your privacy or any other query relating to our Privacy Policy, please contact us.

Email	**andy@jenbro.co.nz**
Phone	**027 3000 324**

13 Our policy

We do this

- ✓ Ensure that client information is only used, retained or disclosed:
  - for the purpose of giving Financial Advice to the client;
  - for another purpose that is directly related to giving the Financial Advice;
  - if the use, retention or disclosure is required or permitted by law; and
  - for another purpose if the client has agreed.
- ✓ Inform clients how their information will be collected, used, retained or disclosed by providing a privacy notice.
- ✓ Ensure that client information is retained only for as long as it is required for one or more of the above reasons (consistent with our record-keeping policy).
- ✓ Allow clients to access and correct their personal information, unless an exception under the Privacy Act applies.
- ✓ Ensure that when the client information is no longer needed, it is returned to the client or disposed of securely.
- ✓ The Managing Director is the company's Privacy Officer and has a requirement to understand their responsibilities under the Privacy Act.
- ✓ Regularly train our people so they understand what we need to do to ensure compliance with privacy laws, spot and report privacy breaches, and manage privacy requests and corrections.
- ✓ Ensure that physical and electronic security measures and protocols are maintained so that only authorised personnel of our FAP have access to client information.
- ✓ If a privacy breach occurs that is likely to cause harm, we inform the individual and the Office of the Privacy Commissioner as soon as reasonable.
- ✓ Obtain consent from clients for their information to be provided to regulatory bodies should it be required for supervisory purposes.

- ✓ Obtain consent before sending any electronic marketing messages and provide an unsubscribe mechanism.
- ✓ When outsourcing and personal information is transferred offshore, we have contractual protections in place to provide the same protections under the NZ Privacy Act.

We don't do this

- × Leave client documents in an unsecure environment.
- × Use client information for any purpose other than that for which it was provided to us.
- × Breach client confidentiality by disclosing, verbally or in writing, client information to third parties without client consent.
- × Breach the information security protocols we have in place restricting who has access to client information, be it in physical or electronic form.
- × Hold client information for longer than is required for the purposes of the relationship and/or meeting legal requirements.

14 Implementation

- All staff receive induction and annual retraining on the contents of this policy.
- Formal client consent to provision and use of information on file.
- IT security and information access protocols in place.
- Secure document storage and destruction facilities in place.

15 Ensuring compliance

- Ongoing monitoring of staff activity and behaviour.
- Annual staff attestations to policy adherence.
- Review and audit of client files annually.
- Annual review of IT access protocols.