

PRIVACY POLICY

PURPOSE

The purpose of this policy is to:

- create clarity;
- ensure that privacy centric behaviours are observed; and
- prevent unwanted behaviours that lead to privacy risk

SUMMARY

At AMI we understand that protecting the personal information of our policyholders is a critically important pillar of the trust relationship. We will do everything that we can to ensure that personal information is processed in ways that align to policyholder instructions and that the information is secured during processing and when the data is at rest. We only partner with entities that take privacy as seriously as we do.

KEY PRINCIPLES

Ami has appointed the AMI CEO as Information Protection Officer (IPO). The IPO is responsible to review the nature and extent of privacy risk, adequacy and effectiveness of controls and implementation of management actions for instances of inappropriate use of personal information.

Privacy principles are embedded into key controls. These include:

- Periodic risk assessments to proactively identify and understand privacy risks
- Privacy notice that details the purposes for which Personal Information is collected, used, retained and disclosed
- Consent for use where the collection, use and disclosure are not linked to the other processing grounds such as legitimate purpose
- Retention and Disposal processes to ensure we only retain necessary Personal Information to fulfil the stated purposes or comply with legislation and to destroy or depersonalise personal information when we do not need to retain it.
- Access processes so that Personal Information can be reviewed and updated
- Disclosure processes to ensure that Personal Information is only disclosed to third parties where this has been consented to or is necessary to complete the legitimate purpose
- Processes to secure Personal Information against unauthorised access and cross border transfers
- Ongoing training and awareness

PRIVACY NOTICE

The privacy notice issued to policyholders as part of the disclosure information is extracted below:

We collect and process your personal information (and related third party information that you provide to us of parents, children, spouses, insureds) to be able to provide services and products. You confirm that you have permission to share their personal information with us.

Important to note:

- We have an obligation to ensure that your information is updated and accurate so we may contact you from time to time to ensure this information remains accurate however it remains your obligation to advise us of material changes that may impact your cover and our ability to communicate with you.
- We take every precaution to ensure that your information is secure, and we require the same duty of care with all third parties that we contract with.
- You may withdraw your consent at any time but please note this may impact our ability to provide ongoing services to you.
- You may also object, correct or request details of the information we hold about you from our compliance officer or information protection officer.
- All information you provide us with will be treated as confidential unless we are legally obliged to disclose such information or if it is necessary to give effect to your instructions.

We use your information (that you have provided to us) to:

- Submit applications to Product Providers
- Submit and assess claims
- Perform customer relationship management
- Comply with regulatory compliance requirements
- Assess your credit record (where this is an underwriting or product requirement)
- Keep you informed of product changes and additional services and products (you may opt out of this at any time)

We may share your information with:

- Third parties that provide service to us (Systems providers, Compliance Officers, Legal representatives, Support services, Marketing assistance providers, financial planning systems & Regulators)
- Product Providers

POLICY ADOPTION AND APPROVAL

Adopted by AMI CEO Christelle Colman in May 2022