

Privacy Policy

Privacy

This Privacy Policy sets out how COTA Membership Services (CMS) collects, stores, uses and discloses personal information. CMS is committed to protecting your privacy in accordance with the Privacy Act. This policy describes our current policies and practices in relation to the handling and use of personal information.

COTA collects and holds personal information in relation to individual membership such as your date of birth and address. In addition we may hold information which you have provided relating to products or services you have participated in or purchased from us.

COTA values and will always protect your privacy. For example, we never have and never will pass on your details to a third party other than to product and service providers which are bound to us by confidentiality and non-disclosure agreements.

Where required by law, we will provide you privacy information (in the form of a Privacy Notice or other privacy disclosure documentation) specific to the products or services you want to obtain from us or specific to your dealings with us.

What is 'personal information'?

Personal information is 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.

What kinds of personal information do we collect and hold?

The personal information collected and maintained by CMS generally includes your name, date of birth, gender, address, contact details and information specific to the membership product or service you decide to purchase from us or your dealings with the specific CMS business.

Any personal information which we keep about you such as your address or date of birth enables us to continue to deliver and enhance the products and services we provide. We recognise and support your right to privacy in relation to this information and will continue to handle it with care and in accordance with legal requirements.

For employment applications, we collect your name, address, 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.

How do we collect your personal information?

COTA Membership Services (CMS) collects and holds personal information in relation to memberships and other services it offers. Where it is possible, we collect your personal information directly from you in person, in writing, over the telephone, by facsimile, through our online services (including our virtual online assistant and any online chat functions) and/or by electronic messages. In some circumstances, we may also collect it from:

- third parties who you have asked to provide your personal information to us, including your referees and your insurer;
- our service providers;
- law enforcement, dispute resolution, statutory and regulatory bodies;
- marketing organisations, including through the use of purchased lists;
- publicly available sources such as the Internet and telephone directories; and/or

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

If you decide to complete an online application form, the information that you enter into the online form will only be collected by us if you submit your online application. If at any stage you cancel your application prior to submitting your application, the information you have entered up to that point will be automatically deleted.

Website tracking

We may collect information about your visit to our site 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 and state you are in.

We may use 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. 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 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 may retain the content of any email that you send to us 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; our response to you may be monitored for quality assurance issues.

For what purposes do we collect, hold and use your personal information?

COTA needs this information to administer your membership and to manage products you may purchase or other services you may use. This information has been given to us on a strictly confidential basis and will only be used for the purposes for which it was provided, and in provision of those products and services. We disclose personal information to third parties who we believe are necessary to assist us and them in providing the relevant services and products.

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

- arranging and administering your membership;
- conducting customer research and analytics in relation to our service and products, and improving our service and products;
- handling complaints and disputes;
- training our employees, agents and representatives;
- marketing our services and products and those of our related companies and business partners that may interest you;
- identifying and contacting individuals who do business with us; and/or
- assessing and processing employment applications.

Personal information (including sensitive information) collected for workers compensation claims will only be used in connection with the business of providing workers compensation claim services or for purposes required by workers compensation regulators or by law.

Who do we disclose your personal information to and why?

CMS may, from time to time, provide you with information about products and services offered by COTA Australia, COTA Insurance, members of the COTA Federation, other affiliates of CMS and the products and services which we have designed and developed for people 50 and over. Unless you request otherwise you authorise COTA to contact you with information which we think may be relevant or of interest to you.

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

- our related companies;
- government, law enforcement, dispute resolution, statutory, regulatory or enforcement bodies and agencies;
- external data collection and verification agencies;
- repairers and suppliers;
- your employer;
- the agent and contractor of any of the third parties above; and/or
- other parties as required by law.

We may also disclose your personal information (but not sensitive information) to others we have business arrangements with to enable them to offer their products and services to you.

We will not disclose your sensitive information for any purpose, other than the purpose for which it was collected, or a directly related secondary purpose, unless you otherwise consent.

Disclosure to overseas recipients

In some instances, your personal information might be disclosed to other companies, business partners and service providers (including providers of our virtual online assistant and any online chat function) that may be located overseas.

We regularly review the security of our systems used for sending personal information overseas. Any information disclosed may only be used for the purposes of collection detailed previously and for system administration.

Direct marketing and your privacy

From time to time, we may use your personal information to advise you about or offer you other products or services that may be relevant and of interest to you. If you do not want to receive these offers from us (including product or service offerings from us on behalf of intermediaries and/or our business partners), please email info@cotamembership.org.au or call the telephone number in the 'Contact Us' section of our website.

In some instances, we may disclose your personal information (but not sensitive information) to others we have business arrangements with to enable them to offer their products and services to you.

We do not use or disclose sensitive information for the purposes of direct marketing.

Personal information, which is not sensitive information, that is collected for workers compensation insurance and compulsory third party insurance in South Australia will not be

used or disclosed to others for direct marketing, customer or market research purpose unless required by the regulator.

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 our or your agent, or our service providers, they may also hold copies of your personal information.

Where it has been collected for the purposes of providing a product or service, the product or service provider 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

CMS aims to ensure that your personal information is accurate, up to date, complete and relevant. You can seek access to and correct your personal information by contacting us.

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 using the following contact details:

Phone

1300 1400 50
CST 9am-5pm
Monday-Friday

Email

info@cotamembership.org.au

You may not access or correct personal information of others unless you have been authorised by their express consent or otherwise under law, or unless they are your dependents under 16 years.

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 or process your membership application. In cases where we do not agree to give you access to some personal information, we will give you reasons why.

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 on the above contact details or in writing to:

The Compliance Officer
COTA Membership Services
16 Hutt Street,
Adelaide, SA 5000

Or by email to: info@cotamembership.org.au

We will respond to your query or complaint as soon as possible and will try to resolve any complaint within 14 working days. If this is not possible, we will contact you within that time to let you know how long we estimate it will take to resolve your complaint. Any unresolved complaints should be referred to the Privacy Commissioner.

In Australia:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
www.oaic.gov.au

If you would like to make a complaint about CMS, its products or its services, you should first contact us with your complaint by phone or in writing using one of the contact methods detailed below:

In writing to:

The Complaints Officer
COTA Membership Services
16 Hutt Street,
Adelaide, SA 5000

Or by email to: info@cotamembership.org.au

By phone on: 1300 1400 50 (Mon–Fri 9am-5pm CST)

We will investigate the matter(s) raised and respond to your query or complaint directly as soon as practical and will try to resolve any complaint within 14 working days. If this is not possible, we will contact you within that time to let you know how long we estimate it will take to resolve your complaint.

If you are unhappy with the resolution of your complaint or with the way that CMS has handled your complaint you can request that the complaint be escalated further. Depending on the specific nature of the complaint it will be escalated to the appropriate internal or external channel. Details of the appropriate channel and process will be provided to you at the time of escalation, based on your specific situation and the type of complaint being made.

Changes to this Privacy Policy

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.

Please note this Privacy Policy is valid exclusively for CMS. COTA Insurance and Membership Services (IMS), COTA Australia and members of the COTA Federation are separately incorporated bodies and, as such, their policies may vary. For more information please visit the relevant COTA body for details and contact information.