

## Introduction

Asteron Life Limited ("**us**", "**we**" "**Asteron**") is committed to protecting your personal information and complying with applicable privacy and data protection laws, including the *Privacy Act 2020* and *Health Information Privacy Code 2020*. This privacy policy ("**Policy**") sets out the minimum standards for how we deal with personal information collected, used, stored, and disclosed by Asteron.

When we refer to "personal information", we mean any information about an identifiable individual, including information that is reasonably capable of identifying an individual ("**Personal Information**").

We will comply with the terms of this Policy and applicable privacy and data protection laws when handling your Personal Information.

If you do not provide us with consent to handle your Personal Information, we may no longer be able to provide our services to you.

This Policy may be amended from time to time and any updates will apply from the time that they are made available on our website.

## Personal Information we collect

The Personal Information that we collect may include:

- identifying information and contact details such as your full name, date of birth, physical address, email address and telephone number;
- your emergency contact details;
- details of your family where relevant to the services that we provide to you, for example, if your children and spouse share a policy with you;
- details of insurance coverage information including policy numbers, discounts and other benefits;
- financial information including your bank account details, income, payment history, credit history and KiwiSaver / superannuation details;
- other insurer information, including ACC information;
- your employment status and employment information relating to the services we provide to you;
- medical information including your medical history, photographs, reports and opinions of health professionals;
- details of your claims history including assessments and prior approvals;
- government identifiers such as licence numbers, IRD numbers, passport numbers and ACC claim numbers; and
- your interactions with us, including voice recordings and transcripts of telephone calls, email and other communications, completed online or hard-copy forms and your online preferences.

## How we collect Personal Information

We typically collect your Personal Information directly from you. We may also collect Personal Information indirectly where you have authorised this or where we are permitted or required to do so under applicable privacy and data protection laws. This includes through cookies on our website, your interactions with social media pages, your online presence and via authorised third parties, including employers, guardians/attorneys, medical providers, financial advisers and public sources.

We may also collect Personal Information indirectly from third parties where this is relevant to the services that we provide you, including from:

- your previous or existing employer;
- persons authorised by you such as advisers, lawyers or accountants;
- medical, health or other treatment or rehabilitation providers;
- credit information providers;
- publicly available sources of information such as internet search engines or social networking services;
- market research organisations through surveys or telephone polls;
- third-party brokers such as insurance and mortgage brokers;
- credit reporting bodies; and
- agencies such as the Inland Revenue Department or the Department of Internal Affairs (relating to the official death register).

Asteron will ensure that the collection of any Personal Information is lawful, fair and not unreasonably intrusive. Collection of your personal information will be limited to what is necessary in the circumstances to meet the purposes that the Personal Information is collected for, as set out below.

If you are providing us with information about anyone else, you must make sure it is accurate and, where practicable, you must tell them Asteron are collecting their information and that they agree to this policy.

## Why we collect Personal Information

We may collect Personal Information for the following purposes and any directly related purposes, including to:

- identify you (including electronic identity verification);
- ensure Personal Information about you is up to date, including in the case of death;
- determine your eligibility to receive our products or services, including through consideration of third party information such as medical information, credit information or third party insurer information,
- manage our relationship with you, including communicating with you via text message, email, telephone or hard copy correspondence to answer your queries, provide you with information, or address any complaints or disputes;
- administer and provide you with our products and services, including dealing with you, an insured person or a third party in connection with an insurance proposal, policy, payment, or claim;
- recommend updates to insurance policies to ensure adequate coverage of services beneficial to you;
- provide you with marketing communications and invitations and offers for products and services including products or services that third-party business partners believe may be of interest to you;

- conduct business processing and governance functions including auditing, recording keeping, data analytics, training, and complying with our legal and regulatory obligations;
- meet our legitimate business interests, include the re-structuring or sale of our business or the conduct of legal proceedings;
- develop and improve our products, services, and internal operations, including through our website and social media channels; or
- as otherwise permitted or required under law including any applicable privacy and data laws.

We may also use AI technologies to enhance our services and provide a better user experience. Our AI systems may process personal data to personalise content, improve customer support, and analyse user behaviour. We ensure that all Personal Information processed by AI is handled securely and in compliance with applicable privacy and data protection laws.

If the purpose for which any health information about you is collected does not require us to collect your identifying information, we will not require that you provide your identifying information to us.

## Storing Personal Information

We hold your Personal Information only so long as is necessary in accordance with the Privacy Act 2020.

Your Personal Information may be stored by us in New Zealand, Australia and Japan. Where we store your Personal Information, we will ensure that the information is protected by reasonable security safeguards, in accordance with the Privacy Act 2020 (as modified by the Health Information Privacy Code 2020), to protect personal information from misuse, interference, damage and loss from unauthorised access, modification or disclosure.

## Disclosing Personal Information

We may disclose your Personal Information to our related entities or third parties for the purposes outlined above, or for directly related purposes. We may also disclose your Personal Information where this is permitted or required under applicable data or privacy laws or to meet our legal obligations. For example, we may disclose your Personal Information to:

- our related entities including those located in Australia, New Zealand, Japan, United States of America, Bermuda and Taiwan;
- our consultants, agents, contractors and service providers, including our third-party healthcare service providers, auditors, or external advisers;
- third party financial service providers including banks and credit agencies,
- other insurers;
- to any authorised representative, agent, adviser, medical professional, or person acting on your behalf to whom you have provided your express or implied consent;
- with any co-insureds, including to confirm that full disclosure has been made to us or to ensure that the policy owner is aware of the details of all benefits and services claimed on the policy;
- employers or group scheme administrators;
- the Police or other regulator where we are compelled to do so or where we are permitted to do so under the Privacy Act 2020;
- the Department of Internal Affairs; and
- MyTrove (death register information provider).

One of our re-insurers is Swiss Re Life & Health Australia Limited (Swiss Re), meaning Swiss Re may indirectly collect your information. Where Personal Information is provided to Swiss Re, Swiss Re will collect and use the information in accordance with their privacy policy [https://www.swissre.com/australia\\_newzealand/our-business/life-and-health/privacy-policy-anz-life.html](https://www.swissre.com/australia_newzealand/our-business/life-and-health/privacy-policy-anz-life.html), which also permits them to disclose the information to certain third parties. Rights of access to and correction of Personal Information held by Swiss Re is also set out in their privacy policy. More information about Swiss Re can be found on their website [https://www.swissre.com/australia\\_newzealand/](https://www.swissre.com/australia_newzealand/).

We will only disclose Personal Information to third parties overseas, including to our related entities, with your consent or in circumstances where permitted under the Privacy Act 2020 (as modified by the Health Information Privacy Code 2020) including where we believe on reasonable grounds that:

- the third party is subject to the Privacy Act 2020 or privacy laws that provide comparable safeguards to those in the Privacy Act; or
- the third party is required to protect the information in a way that, overall, provides comparable safeguards to those in the Privacy Act 2020.

## Access to and correction of Personal Information

You have the right to request confirmation of whether we hold any of your Personal Information and access to that information. You may also request that your Personal Information be corrected if you think it is inaccurate, incomplete or out of date. Our contact details are listed below.

## Cookies and website information

We use website analytics measurement software to collect visitor information when you use our websites, mobile or tablet applications 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 or in memory when a website is visited. Cookies help us determine the type of browser and settings you are using, where you have been on the websites, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our websites, including presenting web pages according to your needs or preferences. Cookies also give you access to certain pages of the websites without having to log in each time you visit.

For information on disabling these cookies, please go to the privacy settings section within your browser. If you choose to disable cookie acceptance in your browser, you may not be able to access some parts of our websites, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

We also use other external companies for the following purposes:

- for web hosting services for our website,
- to gather non-personal information (using cookies) in order to evaluate the website's effectiveness, for example online marketing activities, and
- to track the traffic and usage on the website.

When you visit our websites, including [www.asteronlife.co.nz](http://www.asteronlife.co.nz), we may collect information from you about your visit to our site to assist us to measure and improve our website. Each time you visit our websites, we may collect information about your visit which may include the following:

- the date and time of visits;

- the pages viewed and your browsing behaviour;
- how you navigate through the site and interact with pages (including fields completed in forms and applications completed);
- general location information; and
- information about the device used to visit our website (including your tablet or mobile device) such as device IDs.

Our Chatbot services available on our website are not anonymous. Information that you enter when interacting with our Chatbot will be monitored and recorded and may be used to help us improve our Chatbot functionality. Any Personal Information provided during your interaction with our Chatbot will be stored, used, and handled in accordance with this Policy. However, we recommend that you do not share sensitive personal information with our bots such as credit card or bank account details.

## External Links

Our website may also contain links or references to other websites that we consider contain content relevant to the information that you were seeking from us. Any links to external website are not subject to this Privacy Policy or our standards and procedures. You should check their own privacy policies before providing your personal information.

## Marketing communications

We will only send you marketing communications if we have a legitimate interest as described above, such as if you have provided your express consent when signing up to our newsletters. If you no longer wish to receive any marketing communications from us, please let us know and we will respect your preference. You can do this at any time by contacting us directly by email or phone (see below for contact details).

## Contact us or make a complaint

If you would like to contact us, including if you would like to access or correct your Personal Information, have any questions, or have a privacy complaint, you can contact us at [contactus@asteronlife.co.nz](mailto:contactus@asteronlife.co.nz)

Alternatively, if you think that your privacy rights have been breached, you can also contact the Office of the Privacy Commissioner on 0800 803 909 or find them online at [www.privacy.org.nz](http://www.privacy.org.nz). The Office of the Privacy Commissioner also provides further information regarding your rights under the New Zealand Privacy Act.