

# AUS Privacy policy

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# Privacy policy

DUAL Australia Pty Ltd ("DUAL", "we", "us", "our"), is part of Howden Group Holdings and we are an Underwriting Agency.

At DUAL, we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth) (Privacy Act). This Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal and sensitive information. For further information on what constitutes personal and sensitive data, please refer to Appendix 1. This policy also deals with how you can complain about a breach of the privacy laws, how you can access the personal information we hold about you and how to have that information corrected.

## 1. What information do we collect and how do we use it?

We collect your information to issue an insurance quotation or a policy, or to assess a claim made on an insurance policy that we have issued. We collect such information from you (the person seeking insurance) or your insurance broker or representative.

The information we collect can include a broad range of information ranging from your name, address, contact details, age and gender to other information about your personal affairs including your claims history, assets, liabilities, occupation, financial situation and your health and well-being. For further information on what constitutes personal and sensitive data, please refer to Appendix 1.

## 2. What are the purposes for which we collect information?

We collect information from you when you complete quote and contact forms on our website or contact us directly (such as via email) to provide information.

We use your information to assess the risk of providing you with insurance, verify your identity, carry out fraud and credit checks, assess and evaluate risks, provide quotations, and issue policies, on behalf of the insurers we represent. Once we have provided you with your policy, we will use your information to administer your policy, deal with your queries, manage the renewal process and deal with complaints. We may do so by mail or electronically, unless you tell us that you do not wish to receive electronic communications. We will also need to use your information for purposes associated with our legal and regulatory obligations as an insurance intermediary.

We will also use your information to assess the merits of, validate and manage, any claims, including settlements and dealing with claims-related complaints. If you are also an insured person, we will use information related to your claim to inform the renewal process and potentially any future policy applications.

### Marketing

We may collect, use, store, and share your personal information to communicate with you through various channels, including email, phone, SMS, mail, social media, and digital advertising. This may be done to:

- Provide you with updates, newsletters offers, and information about our products and services that may be of interest to you.
- Share relevant offers and information from our partners, affiliates, agents, and other organisations we work with or promote.

We will always give you the option of electing not to receive these communications and you can unsubscribe at any time by notifying us that you wish to do so.

Where necessary, we may use your information internally to help us improve our services, resolve any problems or to meet our legal and regulatory obligations.

### 3. What if you don't provide some information to us?

We can only assist in providing you with insurance or assessing an insurance claim if we have all relevant information. If you do not provide us with the information we ask for, we may not be able to provide you with insurance or assess an insurance claim that you have made or provide you with any other services we offer. In addition, when applying for insurance, you have a duty to provide an insurer with the information it needs to decide whether to provide insurance and if so, on what terms. If you do not provide us with all relevant information, you may breach this duty.

### 4. How do we hold and protect your information?

We strive to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

We hold the information we collect from you in electronic form in our document management system, and some information that we collect is stored in hard copy by an external data storage provider which we hold for as long as reasonably necessary. We also use external electronic data storage and data processing providers located in California in the United States and Sydney in Australia for the purpose of storing back-up data and maintaining our customer database to ensure we can maintain our service to you if network interruption occurs.

While we take reasonable measures to protect your personal information when it is in our hands, we are unable to guarantee the security of the internet as a whole. If you are interacting with us online, please ensure that you are doing so in a secure environment. In addition, if you use email to send and receive your personal information, please be aware that the information may be less secure in transit.

### 5. Who may we share your information with?

We provide your information to the insurers we represent when we issue and administer insurance policies. Some of these insurers may be located outside Australia. DUAL uses Lloyd's of London, therefore disclosure is almost always to the United Kingdom, where your information is protected by safeguards that are comparable to the Privacy Act.

When providing you with a quotation or insurance terms, we will tell you where the relevant insurer is located, if they are outside of Australia and if so, where they are located. DUAL will take reasonable steps to ensure that the overseas recipient does not breach any privacy principles and is subject to any law or binding scheme that protects your personal information. If they are not regulated by laws that protect your information in a way similar to the Privacy Act, we will seek your consent -to disclose your information to them.

We are part of the Howden Group Holdings Limited. We may provide your information to other entities in the Howden Group who are based in the United Kingdom, if it is necessary for us to do so to obtain information technology, claims and financial administration support services.

We may need to provide your information to other third parties such as:

- Other companies within DUAL Group and/or the wider Howden Group;
- Brokers, business partners, insurers, intermediaries including but not limited to other insurance brokers and managing general agencies;

- Suppliers and agents involved in delivering products or services to you, such as risk management assessors, complaints management providers, mailing houses, media partners, payment service providers, customer relationship managers, claims experts, loss adjusters, uninsured loss recovery agencies and third-party administrators;
- Service Providers and external data storage providers, who help manage our IT and back-office systems;
- other insurers or another party involved in a claim – for example to recover monies on a claim you have made;
- our regulators, as well as other regulators and law enforcement agencies in the E.U. and around the world;
- other companies in the event of a corporate sale, merger, re organisation, dissolution or similar event;
- Solicitors and other professional services firms (including our auditors).

However, we will take all reasonable steps to ensure that they protect your information in the same way that we do.

We may also provide your information to others if we are required to do so by law or under other circumstances which are permitted by the Privacy Act.

Australian and overseas insurers acquire reinsurance from reinsurance companies that are located throughout the world. Where necessary, your insurer (as distinct from DUAL as underwriter) will disclose information to reinsurers so that they can decide whether to provide reinsurance to the insurer.

## ComplyAdvantage

We share information concerning your request for a quotation and your insurance policy with ComplyAdvantage, who help us check your identity and assess your insurance risk. They do this by collecting data about you from public sources and private databases. You can find out more about who ComplyAdvantage are, how they obtain and use your data, who they share it with and your data rights relating to their activities in their own Privacy Notice, which is available [here](#).

## KYND / CyberCube

We may share information relating to your cyber insurance quotation or policy with KYND and/or CyberCube, cyber risk assessment providers, to help us evaluate your organisation's cyber risk profile. They use publicly available sources and proprietary data to generate cyber risk insights, which may assist us with underwriting decisions.

They may collect and process data such as your business domain name, publicly accessible technical information, and other relevant indicators of cyber exposure. This process does not require access to your internal systems or devices.

For more information about KYND, including how they collect, use, and share your data, and your rights under applicable privacy laws, please refer to their [Privacy Policy](#).

For more information about CyberCube, including how they collect, use, and share your data, and your rights under applicable privacy laws, please refer to their [Privacy Policy](#).

## 6. How can you check, update or change the information we are holding?

Upon receipt of your written request and providing we have enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. Unless impractical, we will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information, please write to our Privacy Officer at [privacy@dualaustralia.com.au](mailto:privacy@dualaustralia.com.au) or Level 29, 123 Pitt Street, Sydney, NSW, 2000.

We do not charge for receiving a request for access to personal information or for complying with a correction request but in some cases, we may need to charge you for our reasonable expenses incurred in providing you with access (e.g. photocopy, administration or postage costs).

In some limited cases, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

## 7. What happens if you want to complain?

If you have any concerns about how we have handled your personal information or whether we have complied with the Privacy Act, the Australian Privacy Principles or this Privacy Policy, please write to our Privacy Officer at [privacy@dualaustralia.com.au](mailto:privacy@dualaustralia.com.au) or Level 29, 123 Pitt Street, Sydney, NSW, 2000.

We will consider your complaint through our internal complaints resolution process and we will respond with a decision within 30 days of you making the complaint.

If you are not satisfied with our resolution of your complaint, you may also lodge a complaint with the Office of the Australian Information Commissioner (OAIC) as follows:

By phone: 1300 363 992

By using the Privacy Complaint Form of the Office of the Australian Information Commissioner.

By the internet: [www.oaic.gov.au](http://www.oaic.gov.au).

By mail: See the Office of the Australian Information Commissioner website for e-mail and postal details

## 8. Your consent

By asking us to provide you with insurance or insurance terms, or to assess a claim you have made, or by contacting us to request information (including by completing quote and contact forms on our website) you consent to the collection and use of the sensitive information you have provided to us as set out in this Privacy Policy.

## 9. Changes to this Privacy Policy

We will update this Privacy Policy from time to time, to keep it up to date or to comply with legal requirements or changes in the way we operate our business. You can also obtain a copy of the most current version of this Privacy Policy by emailing or writing to us using the contact details below. We encourage you to periodically check back and review this policy so that you remain aware of the information we collect, how we use it, and with whom we share it.

By continuing to use our services or otherwise dealing with us, you accept these changes and this Privacy Policy as it applies from time to time.

## Tell us what you think

We welcome your questions and comments about privacy. If you have any concerns or complaints, please contact [privacy@dualaustralia.com.au](mailto:privacy@dualaustralia.com.au) or Level 29, 123 Pitt Street, Sydney, NSW, 2000.

# Appendix 1

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.

## Categories of Personal Data

Information Type	Details of information we typically capture
Contact Details	Name, address, telephone number, email address
Policy Information	Policy number, relationship to the policyholder, details of policy including insured amount, previous claims.
Personal Risk Information	Gender, date of birth, claims history, motor vehicle registration, financial details pertaining to sale of property including but not limited to Property Value and Mortgage Provider, employment history, qualifications, criminal record, disability
Marketing	Name, email addresses, company name, company account and job title, online account details, IP address
Policy Information	Policy Number, relationship to the policyholder/insured person, policy details, previous claims.
Claim Details	Details of Incident giving rise to claim Including: Health Data – eg. Details of injury, medical report Criminal Data – eg driving offences, police reports Data relating to minors
Financial Information	Bank account detail used for payment, property value
Anti-fraud Data	Address, history of fraudulent claims, details of incident giving rise to claim Criminal Data – eg unspent convictions

## Categories of Sensitive Data

Sensitive Information' is a subset of Personal Information and is defined as:

- information or an opinion about an individual's:
  - racial or ethnic origin; or
  - political opinions; or
  - membership of a political association; or
  - religious beliefs or affiliations; or
  - philosophical beliefs; or
  - membership of a professional or trade association; or
  - membership of a trade union; or
  - sexual orientation or practices; or
  - criminal record; or
- health information about an individual; or
- genetic information about an individual that is not otherwise health information; or
- biometric information that is to be used for the purpose of automated biometric verification or biometric
- identification; or
- biometric templates

Information Type	Details of information we typically capture
Personal Risk information	Health Data – eg. Physical and mental conditions, medical history and procedures, Criminal Data – eg. Driving offences, unspent convictions Data relating to children



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