



**AXA ASIA PACIFIC HOLDINGS  
LIMITED**

**AXA PRIVACY POLICY**

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# 1 Introduction

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At AXA we are committed to complying with the Privacy Act. The AXA Privacy Policy sets out how personal information about individuals is handled by the AXA business. Individuals referred to in the AXA Privacy Policy are customers of AXA.

## Scope of policy

This policy applies to the Australian operations of AXA. This includes the employees, contractors and third party individuals working in Australia for and on behalf of AXA.

This policy does not apply to the following related companies of AXA, which have their own Privacy policies:

- Alliance Bernstein Australia Limited
- AXA Financial Planning Limited
- Charter Financial Planning Limited
- ipac (including subsidiaries)
- Monitor Money Corporation Pty Ltd.

## Definitions

'AXA' means AXA Asia Pacific Holdings Limited and its Australian subsidiaries.

'Direct Marketing' is defined as an unsolicited approach to an individual for the purpose of promoting the purchase or sale of a product or a service where the individual is selected based on personal information held or purchased about them.

'National Privacy Principles' are the ten National Privacy Principles (NPPs) set out in the Privacy Act as they apply to large private business organisations from 21 December 2001. The NPPs are available at [www.privacy.gov.au](http://www.privacy.gov.au).

'Privacy Act' is the Privacy Act 1988. Originally only affecting the Commonwealth Public Sector, parts of the Privacy Act have applied to large private business organisations since 21 December 2001.

'Personal Information' means information or an opinion about an individual whose identity is apparent or can be easily ascertained from the information or opinion. It includes information of a sensitive and non-sensitive nature.

'Sensitive Information' includes details about racial or ethnic origin, political opinions or membership of a political organisation, religious or philosophical beliefs or affiliations, membership of a professional or trade association or trade union, sexual preference or practices, criminal record and health information.

## **2 Collection of information**

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- 2.1 We will only collect personal information that is necessary for our business functions, that is, the provision of financial services and products.
- 2.2 When we collect personal information about an individual, we will take steps to ensure that the individual providing the information is aware of:
- (a) the purposes for which their personal information is collected
  - (b) their ability to gain access to the information
  - (c) the consequences if all or only part of the information needed is not provided
  - (d) the organisations or types of organisations to whom personal information may be disclosed.
- 2.3 If it is practicable to do so, we will collect personal information about an individual only from that individual.

## **3 Use and disclosure**

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- 3.1 We will use an individual's personal information for the purposes disclosed to the person. This personal information will not be used for any other purpose unless:
- (a) it is related to the disclosed purpose and where an individual would reasonably expect us to use the information
  - (b) we have obtained the consent of the individual to use the information for another purpose, for example direct marketing.
- 3.2 We will not disclose, sell, distribute, rent, share or pass on to any third party any personal information about an individual unless:
- (a) we have the individual's consent to do so
  - (b) we have disclosed to the individual the types of organisations with whom this information would be shared
  - (c) we are required to do so by law.
- 3.3 We will provide all recipients of direct marketing material the opportunity to opt out from any future direct marketing campaigns.

## **4 Data quality**

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- 4.1 We will take all reasonable steps to ensure that the information we hold on an individual is accurate, complete and up to date.

## **5 Data security**

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- 5.1 We will take all reasonable security measures to protect the personal information we hold from misuse, loss and/or unauthorised access, modification or disclosure. We will also take steps to destroy or permanently de-identify personal information that is no longer required. De-identifying personal information involves removing any details such as name or address which enable the individual to be identified.

## **6 Openness**

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- 6.1 Our privacy policy will be made available to anyone who asks for it.
- 6.2 On request and where possible, we will provide an individual with details of the types of personal information we hold about them, why we hold it, and how we collect, use and disclose that information.

## **7 Access and correction**

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- 7.1 If we hold personal information about an individual we will, on request from the individual, provide that individual with access to the information except in certain circumstances, for example where the information may result in a threat to someone's health, where access would break the law, or where the information is being used in current or anticipated legal proceedings.
- 7.2 If a client disagrees with us over the accuracy or completeness of the information we hold, we will attach a statement to the record of their personal information detailing their concerns regarding the accuracy or completeness of the information we hold.
- 7.3 Where we deny access or refuse to update or change personal information, we will provide the individual with a reason as to why we have made that decision.
- 7.4 If an individual requests access to their personal information we will, if applicable, charge a fee for any costs incurred such as, photocopying, administration and postage costs.
- 7.5 Where access is not provided immediately, we will send an acknowledgment of the request within three days of the request. All access requests will be completed within thirty days.

## **8 Identifiers**

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- 8.1 We will not use, adopt or disclose an identifier that has been assigned to an individual by a Commonwealth government agency, for example a tax file number (TFN), drivers licence number or Medicare number, except for approved purposes. For example, if we hold the TFN of a member of one of our superannuation funds, we are required to provide it to the Australian Taxation Office in certain circumstances.
- 8.2 If you have a product with us, we will normally assign you or your product with a unique identifier, such as a client, policy or member number, but will not do so where it is not necessary.

## **9 Anonymity**

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- 9.1 The nature of financial services does not lend itself to treating clients with anonymity. All transactions require personal information about the individual for whom the transaction is being completed. However, in some cases such as handling enquires about products from potential customers, we can do so anonymously.

## **10 Sensitive information**

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- 10.1 We will not collect any sensitive information about our clients unless:
- (a) we have their consent
  - (b) it is required by law
  - (c) the information is required to prevent or lessen a serious or imminent threat to the life or health of any individual
  - (d) it is required for the establishment or defence of a legal or equitable claim.

## **11 Third party arrangements**

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- 11.1 We have established minimum privacy standards which must be met for all existing and new arrangements with third parties.
- 11.2 Specific provisions addressing privacy are used in all relevant contracts with service providers to ensure minimum standards are met and specific privacy risks are addressed.
- 11.3 We will not send personal information about any individual outside Australia unless we are satisfied that the recipient of the information has privacy standards comparable to those in Australia.

## **12 Complaints process**

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- 12.1 All privacy complaints will be handled in accordance with the AXA Australia Complaint Handling Guidelines. We will seek to resolve all privacy complaints fairly, in a timely manner and without prejudice.