EML Group Privacy Policy

Version	1.3

We help people get their lives back.

Table of Contents

1. Introduction 3
2. Our Privacy Policy 3
3. Personal information we collect and hold 3
4. What happens if you do not provide us with your personal information 4
5. Ways we collect your personal information 5
6. Collection, use, and disclosure of personal information 5
7. How we handle your personal information 9
8. Collection, use and disclosure of personal information for marketing 10
9. Overseas dislcosure 10
10. Security of your personal information 11
11. Anonymity and pseudonimity 12
12. Access and correction of personal information 12
13. Complaints handling 12
14. Contact us 13
15. Changes and getting a copy of the policy 13
16. Definitions 13
17. Policy Governance 13
18. Related Documents 13
19. Version Control 14

1. Introduction

This Privacy Policy applies to all companies with the EML Group. Click here to view the companies covered by our Privacy Policy.

We care about the privacy and security of your personal information and are committed to comply with the Privacy Act 1988 (Cth) (the Act). In certain circumstances, companies within the EML Group may also be bound by privacy and privacy-related legislation applicable in different States and Territories in Australia, in particular where we hold personal information on behalf of government agencies[1]. When refer to 'you', 'your' or 'yours' in this Privacy Statement, we are referring to you if we have collected your personal information. However, in certain sections of this Privacy Policy, we provide specific information relevant to the following different groups:

- A 'claimant' refers an individual whose insurance claims are being managed an entity within the EML Group pursuant to a relevant government insurance scheme or a subsisting agreement between its employer and an entity with the EML Group; and

- A 'policyholder', or an 'employer client' refers to the employer who is receiving claims management services from an entity within the EML Group pursuant to a relevant government insurance scheme or a subsisting agreement with an entity with the EML Group.
- A 'prospective policyholder' refers to an employer, or its broker or other authorised representative, who applies, or starts to apply, to register for or transfer a workers compensation policy with an entity within the EML Group, including through our online portals.

These sections have been clearly marked.

2. Our Privacy Policy

This Privacy Policy provides you with general information about how our companies manage your personal information. When you acquire a product or service from one of our companies or submit a claim with us you will receive further information about our privacy practices in the Privacy Statement. The Privacy Statement will give you specific information about how we will manage the personal information for the product or service and/or particular company. The Privacy Statement will be delivered to you in a number of ways, including hard copy/paper, via direction to a link on a website or any other electronic means.

3. Personal information we collect and hold

For the purposes of this Privacy Policy, 'Personal Information' means any personal information or an opinion about an identified individual, or an individual who is reasonably identifiable. The Personal Information we may

[1] For example, the Privacy and Data Protection Act 2014 (Vic), the Health Records Act 2001 (Vic), the Privacy and Personal Information Protection Act 1998 (NSW) and the Health Records and Information Privacy Act 2002 (NSW).

ask you for will depend on which of the EML Group companies you do business with and the type of product or service you choose.

The types of Personal Information we may collect include:

- your name;
- date of birth
- contact details;
- your tax file number;
- bank account details;
- gender;
- next of kin or emergency contact details;
- information about your use of our product or service; and/or
- any personal information which is either required or needed to be able to provide all the services you require in relation to your policy or claim; and
- information and all records generated during the life cycle of your policy, or your role as an advocate, agent or representative of the claimant.

We may also collect sensitive information such as your:

- health information;
- race or ethnic origin;
- membership of a political, professional or trade association (union); and/or
- through our smartphone application (RecoveryMATE) we utilise biometric information (fingerprint) that is to be used for the purpose of automated biometric verification or biometric identification.

Health Information is a type of 'Personal Information' which may include information about an individual's physical or mental health or disability and the ways in which we may manage or provide health services to you. Types of Health Information we may collect include:

- notes on your symptoms and diagnosis;
- information about a health service you have received or will receive;
- specialist reports; and
- test results and your intentions about future health services.

4. What happens if you do not provide us with your personal information

If we are not able to collect Personal Information about you, we may not be able to provide you with the product or service you want for example, we may not be able to:

- assess, investigate or manage your claim;
- set up and administer your policy; or
- provide the claimant/policyholder with any entitlements under the policy.

5. Ways we collect your personal information

We collect Personal Information in a number of ways including:

(a) directly from you, for example:

- in written and online applications or web forms, including through our online portals;
- information technology systems such as email, through contact over the telephone, mobile or other messaging technology;
- SMS, including links to your application and reminders to complete it;
- when you ask us to call you back (calls may be recorded);
- via the internet including websites and social media; and/or
- from person to person contact.

(b) indirectly, from publicly available sources of information, such as the Australian Business Register; and/or

(c) indirectly, from other persons or organisations for example:

- your nominated authorised representative
- the policyholders and their agents, including brokers and other intermediaries;
- people involved in claims, including witnesses or medical practitioners, allied health providers (including rehabilitation) and other service providers;
- other government agencies, including State or Territory authorities, and alternative complaint bodies, where information sharing is permitted;
- other companies within the EML Group; or
- other persons who are authorised to provide Personal Information about you

6. Collection, use, and disclosure of personal information

We collect your Personal Information during the information life cycle when we engage with you in relation to your product or service, for example, when you make a claim or exercise a right under the policy, or when a complaint is made using the above methods.

We may also collect your Personal Information for the purposes (but are not limited) to the following:

- identifying you and conducting appropriate checks
- assessing and determining liability, managing, and investigating your claim;
- understand your requirements and provide you with a product or service;
- processing your application to register for, or transfer, a workers compensation policy, and contacting you about it, including calling you back at your request and sending you SMS links and, where you have agreed, reminders;

- to maintain contact with the EML Group member, clients and employers under a workers compensation scheme managed by the EML Group and keep them informed of our services, industry developments, seminars and other events;
- engaging with your employer and/or insurer to manage your claim;
- managing, training, and developing our employees and representatives;
- to carry out administrative and processing functions
- managing complaints and disputes, and reporting to dispute bodies;
- seeking recovery due to any claim we or our customers may have against another party;
- engaging with medical professionals and other treatment, rehabilitation, and care providers regarding your claim;
- providing Personal Information to regulators as required;
- operating, maintaining, improving and securing our systems and digital services, and undertaking reporting, data analysis and insights in connection with our services and products; and/or
- getting a better understanding of you, your needs and how you interact with us so we can engage in product and service research, development, and business strategy, including managing the delivery of our services and products and the ways we communicate with you; and

The EML Group websites are hosted in Australia. There are a number of ways in which the EML Group collects information (including personal Information) through its websites, including:

- via tools such as cookies, web beacons, pixels, scripts, widgets and other technologies on EML websites and through email to automatically collect certain types of information. The collection of this information allows us to customise and personalise your online experience (including tailoring our online presence) and enhancing your future online experience. We may also use this information for development and analytics purposes. You can tailor your experience with these technologies via the privacy and browser settings on your device or by rejecting the associated cookies.
- via analytics tools such as Google Analytics and Adobe Analytics. To provide website visitors with more choice on how their data is collected by Google Analytics, Google have developed the Google Analytics Opt-out Browser Add-on. More information about how we use Google Analytics can be found at the Google Analytics Terms of Service page. Adobe also provides a range of opt-out options for Adobe Analytics. This information, because you will not be identified, or reasonably identifiable from it.
- via anti-spam tool such as Google reCAPTCHA, as a means to eliminate spam attacks and to be able to distinguish users from bots. The tool may collect data about how you interact with the website's smart forms, including mouse movements, device IP address, date and time when pages were accessed, device type, operating system and browser information, and geographic location.
- via mailing list tool such as Vision6 to manage its mailing lists and event registrations. The tool collects personal information, such as contact details, that you provide to it when signing up or accessing our online programs, registering for events or when submitting feedback on the EML website. Information about you is also collected when you open, click on links or download any image in an email sent to you via an EML Group mailing list. The information collected includes:

- whether you opened an email sent to you via an EML Group mailing list;
- which links you click in those emails;
- your mail client (e.g. 'Outlook 2016' or 'iPhone');
- if interactions with those emails occurred on a mobile or desktop environment; and
- the country geolocation of your IP address (the IP address itself is not stored).

- via social media networking services such as YouTube and LinkedIn to communicate with the public about our products and services. When you communicate with the EML Group using these services, the EML Group collects the personal information you provide to it by engaging in that communication. These social media applications may collect and use information regarding your use of our websites. Any personal information that you provide via such social media applications may be collected and used by members of that social media application separate to us and are subject to the privacy policies of the relevant companies that provide the applications. We do not have control over, or responsibility for, those companies or their use of your information.

- via survey tool such as Qualtrics XM; to conduct surveys and may collect certain personal information you provide in your survey responses, such as your name, email, job role, place of work and other information that may be relevant in the context of particular surveys.

- via event management tools which enable online RSVP to events including personal information such as a dietary request.

- via web forms that enable you to interact with us, for example, to raise a concern or contact us. lodge a complaint, application, review, data breach notification, enquiry or request. The EML Group collects personal information that you provide to it in the course of using web forms. When you save and submit these forms, the user credentials are encrypted and stored in a secure server located in Australia and controlled by the EML Group.
- via online portals, such as our workers compensation registration and transfer portals. These portals may use Artificial Intelligence (AI) tools to suggest information, such as business details, based on what you enter and publicly available sources (for example, the Australian Business Register). Please check any suggested details before you submit them. Suggestions are not decisions about your application.
- via SMS, to send you links to your application and, where you have agreed, reminders to complete it. Each reminder will identify us and tell you how to opt out.

- via our websites and online documents, including information about how interact with our website and online documents, such as whether documents are opened or viewed, pages visited, links clicked, downloads, time spent on pages, and device or browser information.

We will hold, use, and disclose your Personal Information for the purposes we collected it, as well as purposes that are related, where you would reasonably expect us to do so. We may also disclose your Personal Information in other ways, for example:

- you have expressly or impliedly consented to the use or disclosure;
- we believe the use or disclosure by us is reasonably necessary for an enforcement activity conducted by or on behalf of an enforcement body;
- we reasonably believe that the collection, use, or disclosure is necessary in order for us to take appropriate action in relation to the matter; or
- we are required or authorised by law to disclose your Personal Information, for example, to a court in response to subpoena, or to the Australian Taxation Office, and Centrelink or another regulator within Australia.

We will collect and disclose your Personal Information to other companies that form a part of the EML Group. If the EML Group collects your Personal Information, companies within the EML Group may use and disclose your Personal Information for the purposes described in this Privacy Policy.

Where you are a policyholder or an employer client of EML Group you may also be eligible for membership of Employers Mutual Limited. Your business name and address will be included in the Employers Mutual Limited's register of members. Employers Mutual Limited may use your nominated contact details to provide you with access to its Annual Report, annual general meeting material and service offerings.

We may use your Personal Information and Health Information in Artificial Intelligence (AI) tools to assist your case manager in executing administrative processes supporting your claim. This includes generative AI for producing documents and reports, as well as the automation of administrative tasks. We do not use AI tools for claims liability decision-making but may utilise AI to assist in making initial payments for some claims.

We do not use your Personal Information in our internal AI research and development activities.

In our IT production system environments, certain AI systems may interact with your Personal Information as part of their operational context. However, other than where AI tools assist your case manager or help you complete an online application (as described above), we implement rigorous data governance and anonymisation processes to ensure that any personal information used is de-identified prior to AI processing. These systems operate within a controlled framework aligned with ISO/IEC 42001 and other applicable AI governance standards. The use of AI includes the use of generative AI for producing documents, reports, or sequencing processes, as well as the automation of administrative tasks that may involve access to personal data under strict privacy controls.

Automated decision-making

We do not use computer programs to make decisions about you solely by automated means. A member of our staff makes, and is accountable for, every decision that could significantly affect you.

We do use computer programs, including AI tools, rules-based systems, checklists and spreadsheets, to do things that are substantially and directly related to some of those decisions, such as screening, sorting, scoring, ranking or flagging information. Our staff consider these outputs, together with other relevant information, before making a decision. These uses include:

- **Claims administration:** we may use computer programs to sort, prioritise and allocate claims and correspondence, check claims against scheme requirements, flag claims that may need early or additional support, and assist with initial payments on some claims. This may use information such as your contact, employment and claim details and Health Information. Your case manager decides liability and entitlements.

- **Policy applications and administration:** we may use computer programs to verify identity and business details, suggest business details, check applications against eligibility and scheme requirements, and assist with industry classification and premium-related calculations. This may use information such as your business details, ABN, industry, and workforce and remuneration information. Our staff make decisions about your application, and premiums are set under the rules of the relevant scheme regulator.

- **Administrative triage:** we may use checklists, spreadsheets and other rules-based tools that score or rank information to help our staff decide which matters to action first, which individuals to contact or what follow-up is needed. This includes where those tools are used in deciding not to take an action.

If you would like more information about how a computer program was used in a decision about you, or have concerns about a decision, please contact us using the details in the 'Contact Us' section of this Privacy Policy.

7. How we handle your personal information

There are a range of parties to whom we disclose and collect your Personal Information that are not you and we have marked these sections clearly in this Privacy Policy. These may be parties related to a company in the EML Group or third parties. The particular party will depend on which company in the EML Group you do business with and what product or service you receive.

We may disclose your Personal Information to, and collect your Personal Information from:

- other companies within the EML Group and other business divisions within those companies and our joint ventures;
- the policyholder;
- your current, previous, or future employer;
- where your employer has arranged a policy of insurance through an intermediary, their intermediary, brokers or other financial service provider;
- our representatives or agents;
- hospitals and medical, health or wellbeing professionals;
- rehabilitation, employer or vocational professionals;
- other insurers, reinsurers, insurance investigators, claims and insurance reference services and loss assessors;
- solicitors, private investigators, and other service providers acting on our behalf;
- government, statutory or regulatory bodies and enforcement bodies
- State and Territory workers compensation regulators and authorities, including where we act as their agent;
- clubs, associations, unions, and other industry relevant organisations;
- any external dispute resolution body;
- a trustee or custodian associated with membership of a superannuation fund, investment/managed fund or life insurance policy;
- research and development organisations assisting in customer, product, business or strategic initiatives;
- data warehouses, strategic learning organisations, data partners, analytic consultants;
- social media and other virtual communities and networks where people create, share or exchange information;
- legal and other professional advisers or consultants;

- a third party that we have contracted to provide claims management, financial services, or administrative services – for example:
    - information technology providers, including complaints management systems;
    - administration or business management services, consultancy firms, auditors, and business management consultants;
    - marketing agencies and other marketing service providers; and
    - print, mail, and digital services, imaging, and document management services;

- publicly available sources of information;

- any other organisation or person where you have asked them to provide your Personal Information to us or asked us to obtain Personal Information from them, for example your partner, spouse, parent, or guardian.

- We are able to collect, use, and disclose your Personal Information to any other person if required or authorised by law. We may collect and disclose your Personal Information to these persons and organisations during the information life cycle, regularly, or on an ad hoc basis, depending on the purpose of collection.

8. Collection, use and disclosure of personal information for marketing

Marketing is important for some of the EML Group. We want to collect, use and disclose your Personal Information so we can keep you up to date with products and services we offer and companies in the EML Group can offer you. We may use the following marketing strategies including mail, electronic messaging, SMS, telephone and other internet-based marketing including targeted online advertising and online behavioural marketing. Where you've provided your consent (explicit or implied) to marketing, we may also disclose your Personal Information to third party marketing platform service providers who may combine the Personal Information we disclose with the information they may already hold on you in order to provide you with relevant advertising about our products and services. We will only send you marketing by email or SMS where you have consented, and each message will tell you how to unsubscribe.

For more information on how we will deal with your Personal Information for the purpose of marketing, please refer to your relevant Privacy Statement. Details on how you can exercise your marketing preferences will be detailed in the relevant Privacy Statement or you can contact us using the details in the 'Contact Us' section of this Privacy Policy.

The EML Group does not engage in marketing to claimants.

9. Overseas dislcosure

Sometimes we need to provide your Personal Information to, or get Personal Information about you from, persons or organisations located overseas for the same purposes as in 'Collection of personal Information'. We may disclose your Personal Information in a number of countries including to our offshore operations (including the Philippines, Malaysia, Vietnam,). We may also need to disclose to and collect your Personal

Information from other countries not listed here. We may utilise software services that collect your Personal Information and store it in the US and EU). If we do, we will always collect and disclose your Personal Information in accordance with privacy laws.

Our website, newsletters, email updates and other communications may, from time to time, contain links to and from the websites of others. The personal data that you provide through these websites is not subject to this Privacy Policy and the treatment of your personal data by such websites is not our responsibility. If you follow a link to any other websites, please note that these websites have their own privacy notices which will set out how your information is collected and processed when visiting those sites.

10. Security of your personal information

We may hold your information in:

- computer systems;
- electronic databases;
- digital records;
- telephone recordings; and
- in hard copy or paper files.

We manage the storage of Personal Information in several ways. Personal Information may be managed or administered internally by a company in the EML Group or managed by a third party storage provider with whom the EML Group has a contractual relationship and be either managed locally and/or overseas. We take reasonable steps to protect your Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. The ways we do this include:

- limiting physical access to our premises;
- restricting electronic and physical access to personal information we hold;
- redundant systems and information backups for recovery during major business interruptions maintaining technology security products including data encryption;
- requiring any third party providers to have acceptable security measures to keep your personal information secure; and
- destroying or de-identifying personal information.

Our information handling and provision of online services aligns with security best practice ISO 27001 standards for information management. Our security program follows a continual improvement process which includes incorporation of updates to legal and regulatory requirements. All program reviews focus on enhancements to security information management policies, procedures and appropriate technical control deployments such as data loss prevention, anti-malware protection and network security configurations. The EML Group's systems and information technology infrastructure are regularly audited both by internal and independent external parties and regulatory bodies.

The EML Group trains its employees and representatives in their privacy obligations, and provides authorised persons with user identifiers, passwords or other access codes to control access to your Personal Information.

11. Anonymity and pseudonimity

The Australian privacy regime provides the option of not identifying yourself, or of using a pseudonym where reasonably possible. However, in circumstances where we are required or authorised by law or a court/tribunal to identify you, or it is impracticable to deal with you anonymously or by a pseudonym you will be required to provide an adequate Personal Information to allow us to deal with particular matters in a fair and efficient manner.

12. Access and correction of personal information

You have the right to request access to, and correct, the Personal Information we hold about you. Privacy Laws provide for specified circumstances where access may be refused. We will provide reasons for any refusal in writing.

If you would like to request access to, or correct the Personal Information we hold about you, please contact us using the details in the 'Contact Us' section of this Privacy Policy. We do not charge for making a request or for correcting your Personal Information. We may charge a reasonable fee for giving you access. We will advise you of an estimated fee and payment options when we acknowledge your request which is normally provided within 5 business days. We normally respond to your request within 30 days of receiving your request, however, if we require more time, we will contact you in writing and provide reasons for the further time we require.

We take reasonable steps to ensure the Personal Information we hold is accurate, complete, and up to date. We may refuse your request to correct your Personal Information. If we decide to refuse your request, we will provide reasons for this refusal in writing. You have the right to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading if we refuse to correct your Personal Information. We will take appropriate and reasonable steps to associate that statement with all recordings associated with that information. You can contact us to request the correction to the Personal Information we hold by contacting us the details in the 'Contact Us' section of this Privacy Policy.

13. Complaints handling

If you have a complaint about how we collect, hold, use or disclose your Personal Information or a privacy related issue such as refusal to provide access or correction, please use our complaints process outlined below so that we can help. It is important to follow the complaints process in order to resolve your complaint effectively and efficiently.

If you wish to make a complaint about a breach of this Privacy Policy or the Act, you can contact us using the contact details of our Privacy Officer provided below.

Firstly, the EML Group will acknowledge your complaint and explain how we will work with you to resolve it. At this point we may refer your complaint directly to our Privacy Officer. Whilst we're usually able to resolve complaints on the spot or within 5 business days, we'll let you know if we need more time.

If you are not satisfied with our response to a complaint, you can contact us to discuss your concerns or contact the Australian Information Commissioner (OAIC):

By email	enquiries@oaic.gov.au
By website	www.oaic.gov.au
By telephone	1300 363 992
By letter	Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW, 2001

14. Contact us

The person you have been advised as your contact, for example, a case manager or account manager Case Manager is the best person to contact in the first instance but do not hesitate to contact the Privacy Officer:

By email	Privacy@eml.com.au
By our websites	www.eml.com.au
By letter	Privacy Officer, Level 3, 345 George Street Sydney NSW 2000
By telephone	(02) 8251 9000 and ask to speak with the Privacy Officer

15. Changes and getting a copy of the policy

We encourage you to review and check our website regularly for any updates to this Privacy Policy. We will publish the updated version on our website. If you would like to be emailed a copy of this Privacy Policy, please contact us.

16. Definitions

In this policy, defined terms are capitalised. Terms and phrases not defined below can be found in the Group Definition Policy.

EML	EML is a general insurer
HII	Hospitality Industry Insurance is a specialised insurer

17. Policy Governance

Policy Approver	Chief Risk Officer
Owner	Company Secretary
Business Unit	Office of the Company Secretary
Review Cycle	2 years

18. Related Documents

Internal Documents	EML Group Privacy Statement

External Authority Documents	ISO/IEC 42001
	Privacy Act 1988 (Cth)

19. Version Control

Version history			
Version	Approval date	Effective Date	Comment
1.0	12 March 2024	12 March 2024	New Policy
1.1	22 December 2025	22 December 2025	Addition of AI
1.2	1 August 2026	1 August 2026	Update to Overseas Disclosure
1.3	18 November 2026	18 November 2026	ADM transparency (APP 1.7-1.9); AI pre-fill and online portals; marketing consent; access fees

Contacts

Level 3, 345 George Street,
Sydney NSW 2000

GPO Box 4143, Sydney NSW 2001

T: 02 8251 9000
1800 469 931 (toll free)
E: info@eml.com.au
W: eml.com.au

© 2026 Employers Mutual Limited
ABN 67 000 006 486

We help people get their lives back.