EML
MUTUAL SINCE 1910

EML Group Privacy Statement

Version	**1.2**

We help people get their lives back.

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1. Introduction

This Privacy Statement applies to all companies within the EML Group (the EML Group, we, us, our). Click here to view the companies covered by this Privacy Statement.

We care about the privacy and security of your personal information and are committed to comply with the Privacy Act 1988 (Cth). In certain circumstances, companies within the EML Group may also be bound by State and Territory privacy and privacy-related legislation, in particular where we hold Personal Information on behalf of government agencies (for example, the Privacy and Data Protection Act 2014 (Vic) and the Health Records Act 2001 (Vic)).

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 Statement, 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 a '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. Protecting your privacy

The Australian privacy laws govern the collection, use, and disclosure of personal information to ensure that organisations clearly outline what type of information they collect, the reasons for the collection, the way in which the information is used, and in what circumstances the information is disclosed.

Each company within the EML Group respects your right to privacy and value the trust you place in us. We are committed to handling your personal information in accordance with Australian privacy laws and the Australian Privacy Principles. This Privacy Statement explains how we handle your Personal Information collected by us when we manage your claim, when you act as an advocate, agent or representative of a claimant, during the life cycle of your policy or when you act as an agent of a policyholder, or when you apply to register for or transfer a policy (including through our online portals). By providing your Personal Information, you acknowledge it will be handled as set out in this Privacy Statement.

3. What type of personal information is collected

For the purposes of this Privacy Statement, '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 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 collect may include:

- your name;
- date of birth;
- contact details;
- your tax file number;
- bank account details;
- gender and ethnicity;
- next of kin or emergency contact details;
- information about your use of our product or service;
- 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
- 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.
- biometric information (fingerprint) collected through our smartphone application (RecoveryMATE), used for automated biometric verification or 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 insurance policy.

5. How your personal and health information is collected

Personal Information will be collected directly from you during your claim, during the life cycle of your policy or when you as an agent of a policyholder. For example, we may collect your Personal Information directly from you via:

- in written and online applications or web forms, including through our online portals;
- information technology systems such as email, telephone calls (which may be recorded), including calls back at your request, or other messaging technology;
- SMS, including links to your application and reminders to complete it;
- via the internet including websites and social media;
- via person to person contact.; and/or
- via our website and online documents, including information about how you 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 also collect information through cookies, analytics, anti-spam, mailing list, survey, event management and social media tools on our websites and in our emails. Our Privacy Policy explains these tools and how you can manage them.

We may also collect your Personal Information indirectly from other persons, for example:

- your nominated authorised representative;
- your employer and their agents, including brokers and other intermediaries;
- witnesses;
- 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;
- publicly available sources, such as the Australian Business Register;
- other companies within the EML Group; or

Other persons who are authorised to provide Personal Information about you. 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.

6. Why do we collect personal information

If you are a claimant, we may collect your Personal Information for the purposes of:

- identifying you and conducting appropriate identity verification, including the use of automated decision making and profiling tools;
- processing, assessing, and management of your claim, including assessing liability and assisting with your rehabilitation and return to work;
- verifying any evidence submitted in relation to your claim;
- engaging with your employer, medical professionals and other treatment, rehabilitation and care providers to manage your workers compensation claim;
- managing, training, and developing our employees and representatives;
- managing complaints and disputes and reporting to dispute bodies;
- seeking recovery due to any claim we or our customers may have against another party;
- legal proceedings in connection with your claim including proceedings arising under statutory insurance schemes;
- providing Personal Information to regulators;
- 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
- 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.

If you are an advocate, agent or representative of the claimant we may collect your Personal Information for the purposes of:

- informing all relevant parties of your appointment as necessary in relation to this claim;
- identifying you and conducting appropriate checks to ensure you are an authorised person for the claimant;
- recording you as the authorised person for the claimant;
- processing, assessing, and managing the claimant's claim form from the information you provide us;
- managing, training and developing our employees and representatives;
- managing complaints and disputes and reporting to dispute bodies; and
- 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.

If you are a policyholder or an agent of a policyholder (including a prospective policyholder), we may collect your Personal Information for the purposes of:

- identifying you and conducting appropriate checks, , including the use of automated decision making and profiling tools;

- understanding your requirements for providing a service or product;
- processing your application to register for, or transfer, a workers compensation policy, including suggesting business details for you to check;
- contacting you about your application, including calling you back at your request and sending you SMS links and, where you have agreed, reminders;
- setting up, administering, and managing our products and services and systems;
- managing and updating underwriting data;
- managing, training, and developing our employees and representatives;
- managing complaints and disputes, and reporting to dispute bodies;
- providing Personal Information to regulators including state or territory regulators of personal injury schemes; and
- keeping you informed of our services, industry developments, seminars and other events;
- carrying out administrative and processing functions;
- 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.

7. How we handle your personal 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. How we hold, use and disclose your Personal Information will depend on which product or service you receive.

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

- other companies, trading division or departments within the EML Group and our joint ventures;
- the policyholder;
- your current, previous, or future employer;
- where you or your employer has arranged a policy of insurance through an intermediary, their intermediary, broker or other financial service provider;
- our representatives or agents;
- where you are the policyholder, your company;
- claimants under your policy (if needed);
- the claimant you are representing;
- 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 agencies or departments, 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;
- persons you have authorised to act on your behalf; and
- 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.

We may also use or disclose your Personal Information where you have expressly or impliedly consented, where we believe it is reasonably necessary for an enforcement activity conducted by or on behalf of an enforcement body, where we reasonably believe it is necessary to take appropriate action in relation to a matter, or where we are required or authorised by law (for example, to a court in response to a subpoena, or to the Australian Taxation Office or Centrelink).

We may collect your Personal Information from, or disclose it to, any person or organisation where that collection or disclosure is required or authorised by or under an Australian law, a court or tribunal order, a scheme regulator's guidelines, standards or directions, or an applicable code of practice. For example, we may be authorised or required to collect or disclose your Personal Information under Commonwealth, State and Territory workers compensation and motor accident (CTP) laws, insurance and superannuation laws, privacy and health records laws, the Income Tax Assessment Acts, the *Taxation Administration Act 1953*, the *A New Tax System (Goods and Services Tax) Act 1999*, the *Social Security Act 1991* and the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*, and any regulations made under those laws.We take our privacy obligations seriously and we will take reasonable steps to protect Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

These steps may include:

- limiting physical access to our premises;
- restricting electronic and physical access to Personal Information we hold;
- having in place stand-by systems and information backups to deal with major business interruptions;
- maintaining technology security products;
- requiring any third-party providers to have acceptable security measures to keep Personal Information; and
- destroying or de-identifying Personal Information pursuant to the law.

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 register of members. Employers Mutual Limited may use your Personal Information to provide you with access to its Annual Report, annual general meeting material and service offerings.

We may also use non-personal, de-identified and aggregated information for several purposes including for data analytics, research, submissions, and promotion purposes. Any output is anonymised or aggregated so that no personal information or information relating specifically to you is reasonably identifiable.

We may use personal information for analytical statistical, quality assurance purposes to develop our expertise and know how, including: for benchmarking purposes, development, analytics and business intelligence functions, site trend and performance analytics, quality assurance and thought leadership, and other purposes related to our business.

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 in this Privacy Statement), 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.

We may also use AI tools on our websites and online portals to suggest information, such as business details, to help you complete an application. Please check any suggested details before you submit them. Suggestions are not decisions about your application.

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 assist our staff with some decisions, for example to screen job applications, sort and prioritise claims, verify identity and business details, and decide which matters to action first. Our Privacy Policy explains the kinds of decisions and the kinds of Personal Information used.

8. Our marketing practices

Every now and then, a company within the EML Group might let you know – including via mail, electronic messaging, SMS, telephone and other internet- based marketing including targeted online advertising and online behavioural marketing – about news, special offers, products, and services that you might be interested in. We will only send you marketing by email or SMS where you have consented, and each message will tell you how to unsubscribe. For other marketing, you can tell us at any time that you do not want to receive it. To update your marketing preferences, you can contact us any time using the details in the Contact Us section of this Privacy Statement.

In order to carry out our direct marketing, we collect your Personal Information from, and disclose it to, others that provide us with specialised data matching, trending, or analytical services, as well as general marketing services (you can see the full list of persons and organisations under 'How we handle your Personal Information').

Where you have consented to marketing, we may also disclose your Personal Information to third party marketing platform service providers who may combine it with information they already hold about you, in order to provide you with relevant advertising about our products and services.

The EML Group does not engage in marketing to claimants.

9. Disclosure of personal information overseas

Sometimes, we may provide your Personal Information to, or get Personal Information about you from persons located overseas, for the purposes described Privacy Statement. We may disclose your Personal Information to, or allow it to be accessed from, our offshore operations in the Philippines, Malaysia and Vietnam, and service providers that store it in the United States and the European Union. More information is in our Privacy Policy.

From time to time, we may disclose your Personal Information to, and collect your Personal Information from, other countries not listed here. If we do, we will always collect and disclose your Personal Information in accordance with privacy laws.

Links to third party websites

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 notice 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. How to access and correct your personal information or make a complaint

The EML Group Privacy Policy includes information about how you can access, update, or correct your Personal Information.

You have the right to request access to, and correction of, the Personal Information we hold about you. We do not charge for making a request or for correcting your Personal Information, and we will give reasons in writing if we refuse a request.

Our Privacy Policy also includes information about how you can make a complaint about a breach of the privacy laws and how we'll deal with such a complaint.

You can request a copy of the EML Group Privacy Policy, access, update, and correct your Personal Information, or make a complaint by contacting your Case Manager or account manager, or our Privacy Officer.

We will acknowledge your complaint and explain how we will work with you to resolve it. We usually resolve complaints on the spot or within 5 business days, and we will let you know if we need more time.

If you are not satisfied with our response to a complaint, you can contact us by using the details in the Contact Us section to discuss your concerns or contact the Australian Privacy Commissioner via www.oaic.gov.au. You can also contact the OAIC on 1300 363 992, by email at enquiries@oaic.gov.au or by letter to GPO Box 5218, Sydney NSW 2001.

13. Contact us

We recommend that you contact your case manager or account manager in the first instance but do not hesitate to contact the EML Privacy Officer:

By email	Privacy@eml.com.au
By our websites	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

14. 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

15. Policy Governance

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

16. Related Documents

Internal Documents	EML Group Privacy Policy
External Authority Documents	ISO 27001 ISO/IEC 42001 Privacy Act 1988 (Cth)

17. 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	18 November 2026	18 November 2026	ADM statement; AI pre-fill and online portals; marketing consent

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