



# Swaggle Pet Insurance

## Important information about privacy

### Who's responsible for this statement?

This is a joint Privacy Statement provided to you by:

- CGBV1 Pty Ltd trading as: Swaggle ABN 95 664 431 485 (AR001306894),
- Coles Supermarkets Australia Pty Ltd ABN 45 004 189 708 (AR Number 269259) and its associated entities (together the "Coles Group"); and
- Guild Insurance Pty Ltd ABN 55 004 538 863 (Guild), the issuer of Swaggle Pet Insurance.

It contains important information about the collection, use and disclosure of personal information by Swaggle, Coles Group and Guild. Where personal information is collected, used and disclosed for the same purposes by both companies, the word "we" or "us" is used. Where personal information is treated differently, the organisation is identified separately.

Guild is the provider of the SwagglePet Insurance service. Guild has appointed Swaggle and Coles to promote and distribute the service. You can find out more about the relationship between Swaggle, Coles Group and Guild in the Financial Services Guide (FSG) available at [swaggle.com.au/pages/insurance-information](https://swaggle.com.au/pages/insurance-information).

### What personal information do you collect?

We collect information about you, such as:

- Name;
- Mailing address;
- Email address;
- Phone number;
- Credit Card details.

### Why do you collect, use and disclose personal information?

Guild collects, uses and discloses your personal information for the purpose for which it was provided to Guild, related purposes and as permitted by law. Such purposes include but are not limited to:

- verifying your identity;
- assisting you to gain approval or provision of a product or service;
- providing the products and services you require;
- administering and managing (including the on-going management of) those products and services such as matters relating to making payments;
- market research so that we can better understand our customers' needs and tailor our future products and services accordingly;

- quality assurance and training purposes; and
- to develop and identify products and services that may interest you

Coles Group including Swaggle collect, use and disclose your personal information to provide, administer, improve and personalise Coles Group products and services. This includes but is not limited to:

- promoting and providing benefits associated with your Pet Insurance service;
- managing promotions and conducting product and marketing research;
- communicating with you (including direct marketing);
- maintaining and updating our records;
- improving our understanding of your interests, suitability (including risk assessments) and behaviour in relation to Coles-branded financial products, services and offers and your eligibility for special offers; and
- working with service providers and other companies in the Coles Group for the purposes described above.

## What happens if I don't provide you with my personal information?

If you don't provide us with your personal information, we may not be able to provide our products or services to you. For example, we may not be able to process your new Pet Insurance application.

## How do you collect personal information about me?

We usually collect personal information about you directly from you whenever possible, such as when you apply for a Swaggle Pet Insurance product. There may be instances where we need to collect it from a third party. This may include providers of surveys, competition or marketing related services, Facebook and Google, public sources, providers who administer Swaggle-branded products and services, anyone you have authorised to deal with us on your behalf, and/or our legal advisers.

If we collect information about you from someone else, we'll only do so if we need that information to provide or administer your policy.

If we collect information under a law, regulation, or court order then we'll advise you of the law or the court order applicable.

## Who do you share my personal information with?

Guild will share some of the information that you supply in your application form with Coles Group including Swaggle. This includes information such as your name and address. Guild does not share with Coles Group or Swaggle your payment card details.

To make it easy for you to interact with us and to ensure we're able to provide you with a more personal consistent experience, we may exchange personal information as set out below for the purposes described in this Privacy Statement.

Guild may share your personal information with:

- Coles Group;
- Swaggle
- Government and law enforcement agencies;
- Internal dispute resolution officers and dispute resolution providers, such as the Australian Financial Complaints Authority (AFCA).

Coles Group including Swaggle may share your personal information with:

- each other for the purposes set out in this Privacy Statement;
- Guild;
- business partners from time to time for analysis and research purposes and in the development of products, services and promotional offers;
- service providers including call centres, mailing and printing houses, researchers, professional advisers; and
- other organisations as required or authorised by law, for example to government or regulatory bodies



## Do you have a privacy policy?

To find out more about how we manage your personal information, you can access the Coles Group Ltd Privacy Policy at [www.coles.com.au/privacy](http://www.coles.com.au/privacy), the Guild Privacy Policy at [guildinsurance.com.au/privacy-policy](http://guildinsurance.com.au/privacy-policy) and the Swaggle Privacy Policy at [swaggle.com.au/pages/insurance-information](http://swaggle.com.au/pages/insurance-information).

## How do I access my personal information, or make a complaint?

The privacy policies for Swaggle, Coles Group Ltd and Guild contain information about how you can raise a concern in relation to your privacy and how we will deal with such a concern. They contain information about how you can access the personal information we hold about you and how you can ask us to correct that information.

## Will you send my personal information overseas?

Some of our service providers who assist us in providing you with your products and services are located overseas. If we share your personal information with an organisation that is located outside of Australia, we'll ensure it's handled in accordance with our privacy policies and the Privacy Act 1988 (Cth).

Guild may need to share some of your information (including credit information) with organisations outside Australia, including the Philippines. The location of Guild's service providers may vary from time to time. Guild gives you notice of these changes by updating its online Privacy Policy which you can access at [guildinsurance.com.au/privacy-policy](http://guildinsurance.com.au/privacy-policy).

Service providers to whom Coles Group including Swaggle discloses personal information may be located in Australia and other countries including but not limited to EU Member States, India, Ireland, Japan, Hong Kong, Malaysia, the Philippines, Singapore, South Africa, the United Kingdom, and the United States.

## Can I opt out of receiving direct marketing?

We may provide marketing communications and targeted advertising to you on an ongoing basis by telephone, electronic messages (e.g. email), our digital services and other means. These communications may relate to the products and services we provide and other products which may be of interest to you.

Unless you tell us that you no longer wish to receive these communications, the consent you give us by accepting this Privacy Statement applies for an indefinite period.

If you do not want to receive direct marketing information from Swaggle Pet Insurance, call us on 1300 738 730 or send us an email to [petinsurance@swaggle.com.au](mailto:petinsurance@swaggle.com.au).

## Email communication

If you provide us with an email address, you consent to electronic communications being sent to you via that email address, including notices and reminders. To protect your privacy, we recommend that any email address you provide to us be your personal email address rather than, for example, an email address accessible by your work colleagues or family members.