9 NOVEMBER 2026

TOKIO MARINE NICHIDO

Tokio Marine Australasia

Privacy Policy

1. Overview of the policy

We are Tokio Marine Management (Australasia) Pty Ltd ABN 69 001 488 455, AR 1313066 (TMMA), the managing agent and corporate authorised representative in Australia for Tokio Marine & Nichido Fire Insurance Co., Ltd. ABN 80 000 438 291 AFSL 246 548 (Tokio Marine).

As part of the Tokio Marine group in Australia and New Zealand, this policy also applies to Accident & Health International Underwriting Pty Ltd ABN 26 053 335 952 AFSL 238 261, Bond and Credit Company Pty Ltd ACN 609 018 840, BCC Surety Pty Ltd ACN 163 415 610, BCC Trade Credit Pty Ltd ACN 608 296 233 AR 1276628, and Tokio Marine & Nichido Fire Insurance Co., Ltd. NZBN 9429039805201 (collectively "Tokio Marine Australasia Group" or "TMAG").

In this Privacy Policy, "we", "us" or "our", refer to TMMA, TMAG, and Tokio Marine, unless the context requires otherwise. References to Tokio Marine Group include all related group companies owned or under the control of Tokio Marine Holdings, Inc. (Related Companies).

Tokio Marine is committed to upholding your privacy and protecting your personal information. We are bound by and our policies comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APP), along with any other applicable privacy laws and codes, including where applicable the Privacy Act 2020 (NZ).

This Privacy Policy will help you understand how we collect and handle your personal information to provide products and services and operate our business, including how that information is securely held, de-identified or destroyed.

2. What is Personal Information?

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. This includes sensitive information such as health information, gender, and criminal history.

We will only collect and hold such sensitive information where reasonably necessary to perform our engagement and will generally seek your consent to do so, except where we are permitted or required by law to collect it without consent.

3. Personal Information that we collect and hold

We collect personal information, including sensitive information, about our customers and prospective customers, our employees, prospective employees and contractors, details of persons from our business partners, suppliers and service providers. Depending on the context in which we provide our products and services, this information may include:

- your name and contact details (address, phone number, email address);
- your date of birth;
- proof of identity information, such as your driver licence, passport or other similar identity information;
- your insurance information, such as applications, quotations, policy details, insured assets, beneficiaries, renewal and cancellation history;
- financial and transaction information, such as payment details, premium and excess payments, bank account information, refunds, income or financial position where relevant;
- claims and incident information, such as loss details, statements, photographs, recordings, reports, repair information, liability assessments, settlement information and litigation records;
- sensitive information, where relevant and lawful, including health, medical, disability, injury, racial or ethnic origin, religious beliefs, sexual orientation, criminal record, professional memberships and biometric information;
- fraud, sanctions, anti-money laundering, identity verification and risk-screening information, including alerts and investigation outcomes;
- communications and interaction records, including call recordings, emails, complaints, survey responses and interactions with our websites, apps, portals and social media;
- digital and technical information, such as IP address, device identifiers, browser type, location information, authentication records, cookies, analytics and security logs;
- information about brokers, authorised representatives, suppliers and business contacts, including professional, licence, payment and due diligence details;

- job applicant information, such as employment history, qualifications, references, right-to-work and background-check information; and
- other information necessary to provide you with information regarding our products or services or undertake any transactions or dealings with you.

You may be able to deal with us without providing personal information, such as when making an enquiry. However, if you don't give us the personal information (including sensitive information) we need, then we may be unable to provide products or services, assess any insurance claim you make, and your use or access to our products or services may be limited.

4. How we collect Personal Information

We will collect your personal information directly from you when you use our website, or when you contact us through telephone, email or online or when you complete an application, claim or other form with us. We may also collect your personal information from:

- your insurance broker, your legal advisors, or your family member who applies for a policy that covers you or is instructed by you to deal with us;
- policy holders or others who are authorised or noted on the policy as having a legal interest in it, including where you are an insured person under the policy but not the policy holder or another insured where the policy is issued in joint names;
- third parties who you have asked to provide your personal information to us;
- our Related Companies;
- our agents, authorised representatives, distributors and referrers;
- our service providers (which may also include overseas service providers);
- other insurers and reinsurers;
- people who are involved in a claim or assist us in assessing, investigating, processing or settling claims, including another party involved in the claim or third parties claiming under your policy, your travel consultant/agent, travel service providers, airlines, hotels, providers of transportation, providers of medical and non-medical assistance and services, your employer;
- statutory authorities or government departments, for example, law enforcement;
- external dispute resolution bodies, for example, the Australian Financial Complaints Authority (AFCA), the Office of the Australian Information Commissioner (OAIC) or the Human Rights Commission;
- third party recruitment agencies and service providers, background or police checks, LinkedIn, other third parties you have authorised to deal with us, and from referees you have given us permission to contact;
- our legal or other advisers;
- social media and other virtual communities and networks where people create, share or exchange information;
- clubs, associations, member loyalty or rewards program providers and other relevant organisations;
- publicly available sources of information such as the internet and telephone directories;
- data partners, analytic consultants and other similar organisations;
- agents or subcontractors of any of the above third parties; or
- any other organisation or person where you have consented to provide your personal information to us or consented to us obtaining your personal information from them.

We may also collect personal information that is derived or inferred from information you provide, including summaries or insights generated by our artificial intelligence (AI) supported assessment tools.

If you provide us with personal information about other individuals such as dependents, where appropriate, you should collect their consent to do so and provide these individuals with a copy of this Privacy Policy beforehand or ensure they are otherwise made aware of how their personal information will be collected and used by us.

5. Why we collect, hold, use, and disclose Personal Information

We collect and use your personal information where necessary to conduct our business, including:

- to provide information, products or services you have requested;
- to determine your eligibility and process applications for products and services that you have requested;
- to provide information and services as requested by clients;
- to understand and assess your ongoing needs and offer products and services to meet those needs;
- to carry out client communication, service, billing and administration;
- to investigate, assess and administer claims and complaints;
- to assist our reinsurers provide their services in relation to your product;
- to conduct data analysis, surveys and other evaluations;
- to obtain and update credit information with appropriate third parties, such as credit reporting agencies, where transactions are made on credit;
- to execute monitoring and training for quality assurance purposes and security issues;
- to detect, investigate, prevent and respond to fraud, financial crime, sanctions breaches, misconduct, cyber threats and other unlawful activity;
- to analyse and improve products, pricing, underwriting, claims, customer experience, marketing, digital services, data quality and operational resilience;
- to develop new services;
- to market products and services;

- to conduct processing necessary to fulfil other contractual obligations;
- for complying with, and assisting our Related Companies, agents, business partners, distributors and insurance advisers in complying with, any applicable law, code (including the General Insurance Code of Practice) or regulation, and complying with any requests from courts, government departments, law enforcement agencies and regulators, including but not limited to the Australian Prudential Regulation Authority (APRA) and the Australian Securities and Investments Commission (ASIC) (we will only disclose what is reasonably necessary); and
- other purposes communicated to you at the time we collected your personal information or as required by law.

Your personal information will also be used to consider your applications for employment with us and manage the recruitment processes (if applicable). If you are not successful in obtaining a position with us, we may retain your application and personal information to contact you if a suitable position becomes available in the future.

We will only use and disclose your sensitive information for the purpose it was collected or for any other related purpose that you would reasonably expect, unless you consent or it is permissible under law.

We may also use or disclose your personal information for a secondary purpose with your consent, or where the secondary purpose is related to the primary purpose of collection and you would reasonably expect us to use or disclose your personal information in that way, or where the law otherwise requires or allows it.

We may also use computer programs, including artificial intelligence (AI) tools, to assist us in carrying out the activities listed above. This includes using your personal information to train, develop, test and deploy AI models, and to make, or assist in making, decisions about you. Where computer programs are used in this way, we take steps to ensure it is used responsibly and in accordance with applicable laws.

6. Who we disclose Personal Information to including overseas disclosure

We may share your information with others who help us provide services to you or who act for us (such as insurance brokers, affiliates, referrers, distributors, or professional advisers) including where we outsource certain functions, with other companies in the Tokio Marine Group locally and overseas, and with other third parties if you consent to us sharing your information with them. Sometimes we are required to share your information with local or overseas law enforcement agencies, industry bodies, regulators, authorities or external dispute resolution bodies such as the Australian Financial Complaints Authority (AFCA) in the event of a complaint.

This may include:

- insurance services and insurance products - business partners, including insurers, reinsurers, insurance agents, insurance brokers, other insurance intermediaries, insurance reference bureaus, medical and health service providers, case managers and rehabilitation consultants, fraud detection agencies, investigators, other advisers such as loss adjusters, builders, restorers, lawyers, auditors, actuaries and accountants and others involved in the claim handling process;
- business partners, including credit and fraud reporting agencies, debt collection agencies, insurers and reinsurers, any Authorised Representatives;
- authorised service providers;
- service providers engaged in outsourced functions such as market research, direct marketing, claims handling and recruitment;
- external IT service providers, infrastructure and other third parties where required by law; and
- entities related to the Tokio Marine Group for the purpose of offering you other products and services (where permitted by law and you have not elected to opt-out of receiving such information).

In accordance with the purposes for which we have collected your personal information, we may disclose your personal information to a party located outside Australia such as our affiliated entities, reinsurers, business partners and offshore service providers.

The countries where these recipients are located can change from time to time but may include Japan, Canada, Bermuda, New Zealand, Philippines, Singapore, Thailand, Hong Kong, Europe, the United Kingdom, the United States of America and India. Also, as part of a global insurance group, in some cases we may disclose your personal information to another Tokio Marine Group entity outside Australia. A list of countries where the Tokio Marine Group has a presence can be found here https://www.tokiomarine-nichido.co.jp/en/network/global/.

Disclosure may also be made to government, law enforcement, dispute resolution, statutory or regulatory bodies in relevant countries, or as required by law.

We may also use other offshore service providers to help provide you with our products and services or identify ways to improve our service to you.

We will make every reasonable effort to ensure that we only have business dealings with third parties that value privacy and information security the same way as us and will take reasonable steps to ensure overseas recipients provide the same level of protection for your information using appropriate safeguards such as standard contractual clauses.

7. Direct marketing and communication preferences

Unless you notify us otherwise, we may use your personal information to let you know about products and services from across the Tokio Marine Group or our affiliates and business partners that we think may be of interest to you to the extent permitted by law. You may opt out of direct marketing at any time by contacting us. Information on how to do this is provided in section 12 of this Privacy Policy.

If you opt out of receiving marketing communications from us, we may still need to communicate with you about a product or service you have or had with us. This ensures you remain informed about important updates regarding your product or service.

8. Digital services, cookies, and analytics

We may collect personal information by online means when you visit our public websites or affiliated websites (such as those administered by agents offering Tokio Marine products or services) using cookie technology or other digital tracking technology.

We use cookies and similar technologies to help run our website properly and securely, understand how visitors use our site, for analysis purposes and to deliver more relevant content and advertising. Cookies are small files stored on your device when you visit a website, they don't damage your device and generally can't be used to identify you on their own. Typically, the information we collect through cookies is general and non-identifiable, such as the number of visitors to the site or browsing statistics. If this information does become identifiable (for example, when you are logged into one of our online services), any use or disclosure of your personal information will be managed in accordance with this Privacy Policy.

You can manage or disable cookies at any time by adjusting your browser settings. If you disable cookies, some parts of our website may not work as intended. Some cookies are also set by third parties, such as social media platforms, and may track your activity across other websites. These third parties have their own privacy policies.

We may otherwise collect personal information from Tokio Marine or affiliated websites to fulfil your request for products and services and to improve your online experience. We limit the amount of information collected to support the intended purpose of the collection.

We may ask you for some or all the following types of information when you register for events, request services, manage accounts, access various content and features or directly visit our websites or affiliate websites:

- contact information, such as name, e-mail address, postal address, phone number and mobile number;
- communication preferences, such as which newsletters you would like to receive;
- search queries; or
- contact information about others when you refer a friend to a particular site or service (this information is used solely to facilitate requested communications).

9. Automated decision making and artificial intelligence (AI)

We may use your personal information in computer programs and other automated tools including AI technologies, to support the delivery, administration and improvement of our products and services. This includes making decisions about you or doing something that is substantially and directly related to making a decision about you (an automated decision).

When your personal information is used in this way, it will be used in accordance with applicable privacy laws, regulatory requirements, and our data governance, security and AI governance frameworks. Activities may include, but are not limited to:

- assessing, underwriting and pricing products and services;
- assisting with claims handling and administration and generating summaries and insights to assist with claims decision making;
- summarising information and interactions to improve customer service and operational efficiency;
- data management, analytics, quality assurance and reporting;
- training, developing, testing and deploying AI models; and
- supporting operational efficiency, security and business processes.

The personal information used in these activities can include the information described in section 3 of this Privacy Policy. However, we do not permit personal information to be entered into publicly available AI tools or computer programs unless such use has been specifically approved and appropriate privacy, security and governance controls are in place.

Some of the activities above, such as assessing, underwriting and pricing products and services, can involve automated decisions that could reasonably be expected to significantly affect your rights and interests.

The kinds of decisions for which a computer program does something substantially and directly related to making the decision, with a person involved in the final decision, are underwriting risk scoring, pricing calculations, claims triage and information gathering, and claims assessment recommendations.

Where automated decisions are made in this way, we will take reasonable steps to:

- ensure appropriate human oversight of the decision-making process;
- assess AI systems for fairness, accuracy, reliability and transparency;
- monitor for potential bias, discrimination or unintended outcomes;
- provide a means for decisions to be reviewed by a suitably qualified person, where appropriate; and
- provide additional information about the decision-making process where required by law.

10. Security, retention, and destruction of Personal Information

We may hold your personal information in several ways, including:

- in our secure computer systems or databases, which may involve storing data on storage or computer systems provided by third party suppliers based in Australia and overseas;
- in paper records; or
- in telephone recordings.

Where it has been collected from our or your agent, or our service providers, they may also hold copies of your personal information.

While we store your personal information, we take all reasonable steps to protect it by way of appropriate physical, electronic, and procedural safeguards. For example:

- we implement and impose security measures for access to our systems including information classification, access

controls, multi-factor authentication, encryption, network and endpoint controls, secure development, logging and monitoring, vulnerability management, staff training, physical security, supplier oversight, incident response, testing and assurance;

- operate physical security measures for our buildings;
- impose confidentiality requirements on our employees; and
- provide training on keeping personal information secure.

We retain personal information only for as long as reasonably needed for the purposes described in this policy, to manage legal or operational risk, or to meet statutory, regulatory, prudential, tax, accounting, limitation and record-keeping requirements. Retention periods differ by record type and may extend beyond the end of a policy or claim.

When information is no longer required and no legal basis requires retention, we take reasonable steps to destroy it securely or de-identify it.

As an APRA-regulated insurer, our information security and operational risk frameworks also address applicable prudential requirements, including the protection of information assets, oversight of third parties, incident management, business continuity and operational resilience. No method of storage or transmission is completely secure.

11. Access to and correction of Personal Information

You have a right to request access to the information we store about you or ask us to correct or update your information. We take reasonable steps to ensure your personal information that we collect, hold and disclose is accurate, up to date and complete. However, we also rely on you to let us know of any changes or corrections required to your information. You should contact us to update your personal information or advise us that the information we hold is not accurate, up to date or complete.

We will typically deal with your request to access your personal information within 30 days. We generally do not charge for making an access request but may charge a fee depending on the complexity and volume of information we hold about you. In all cases, you will be asked to verify who you are before your personal information is provided.

Your access to your personal information is subject to some exceptions under the Australian Privacy Principles. Some of these exceptions include circumstances where we reasonably believe that access would have an unreasonable impact on the privacy of others, the information is protected by law, release of the information would be prejudicial to us in relation to a dispute or complaint, or where the information is commercially sensitive.

If we refuse access or correction, or provide access in a different way, we will give written reasons and explain available complaint mechanisms, unless it would be unreasonable or unlawful to do so.

12. Privacy complaints and contacting us

We may update this Privacy Policy from time to time. We encourage you to periodically review this Privacy Policy on our website so that you will be aware of our current privacy practices.

If you have any questions or wish to raise a complaint about a breach of this Privacy Policy, you may contact our Privacy Officer directly on the contact details below. We will respond to your question, suggestion or complaint as soon as possible.

Tokio Marine Australasia Privacy Officer
Tokio Marine & Nichido Fire Insurance Co., Ltd.
GPO Box 4616, Sydney, NSW 2001
Telephone: +61 2 9225 7500
Email: privacy@tokiomarine.com.au

If you are not satisfied with our response to your enquiry or complaint, you can contact us and request that it be reviewed by our Dispute Resolution department who will resolve your dispute within 30 days from when you first notified us. You may contact Dispute Resolution as follows:

Telephone: +61 2 9225 7599
Email: complaints@tokiomarine.com.au

If you are still not satisfied with the outcome of your complaint to us, you can contact the Australian Financial Complaints Authority (AFCA). AFCA is an independent external dispute resolution scheme which is free of charge to you and may consider privacy-related complaints within its jurisdiction where applicable. Contact details for AFCA are listed as follows:

GPO Box 3, Melbourne, VIC 3001
Telephone: 1800 931 678
Email: info@afca.org.au
Website: www.afca.org.au

Alternatively, you can contact the Office of the Australian Information Commissioner (OAIC) by sending a complaint form to:

GPO Box 5288, Sydney, NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Website: www.oaic.gov.au