Privacy Policy

Polaris Risk Services Pty Ltd | ABN 62 689 768 634 | AFSL 700131
Version 2.0 | 19 November 2026

1. About this policy

This policy explains how Polaris Risk Services Pty Ltd ("Polaris", "we", "us", "our") collects, holds, uses and discloses personal information, and how you can access it, correct it or make a complaint.

We are a commercial insurance broker. We hold Australian Financial Services Licence 700131 and are a member of the Steadfast network. We act for you, not the insurer, when we arrange your insurance.

This policy covers personal information we handle about:

- our clients and prospective clients
- people connected to a client's insurance, such as its directors, employees, named drivers and people making a claim
- other people we deal with, such as visitors to our website and staff of insurers and service providers.

We handle personal information in line with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

2. What we collect

What we collect depends on the insurance you ask about. It may include:

- your name, date of birth, gender and contact details
- identification details, such as a driver licence number for motor or fleet insurance
- details about your business, such as its ABN, ownership, directors, activities, turnover, employees, premises and financial information
- details of the property, vehicles, vessels, cargo and other things you want insured
- your insurance history, including previous policies, claims and losses, and any refused or cancelled cover
- payment and bank details, to pay premiums or receive claim payments
- notes and recordings of our calls, meetings, emails and messages with you
- information about how you use our website and online forms (see section 8).

Sensitive information. Some insurance needs sensitive information, such as health information (for personal accident, income protection or travel insurance) or criminal history (insurers often ask about convictions of a business's owners or directors). We only collect sensitive information with your consent or where the law allows it, and only use it for the purpose you gave it for.

Information about other people. If you give us information about someone else, such as a named driver, director, employee or family member, please let them know and point them to this policy.

You can make a general enquiry without telling us who you are, but we cannot arrange insurance without personal information.

3. How we collect it

We collect most information directly from you: through forms, our website, phone calls, emails, SMS, meetings and messages on social media such as Facebook and LinkedIn.

Where we need to, we also collect it from others, including insurers and underwriting agencies, other brokers (such as your previous broker, with your authority), premium funders, claims assessors and loss adjusters, Steadfast and its platforms, people you authorise to act for you (such as your accountant), people who refer you to us, and public sources such as ASIC registers and ABN Lookup.

4. Why we collect and use it

We use personal information to:

- advise on, quote, arrange and renew insurance
- help clients make and manage claims
- arrange premium funding if a client asks us to
- manage our relationship with clients, including invoicing and collecting premiums
- meet our legal obligations, including financial services, record-keeping, breach reporting and complaints-handling obligations
- train our staff and improve our services
- tell you about other products and services that may interest you (you can opt out at any time; see section 9).

If you do not give us information we ask for, or it is incomplete or wrong, we may not be able to arrange cover, and an insurer may be entitled to refuse or reduce a claim or cancel your policy.

5. Who we share it with

We may disclose personal information to:

- insurers, underwriting agencies, Lloyd's managing agents and coverholders, managing general agents and other insurance markets, and wholesale brokers. Insurers may in turn share it with their reinsurers
- Steadfast Group and the quoting, placement, broking and policy administration platforms we use
- premium funders
- claims assessors, loss adjusters, investigators, repairers and other claims service providers
- our related companies that provide services to us
- our support team, who help our brokers with clients' insurance
- our service providers, including IT, cloud storage, CRM, phone, SMS, email, website, marketing and AI providers
- our professional advisers, such as lawyers, accountants, auditors and compliance consultants
- anyone you authorise to act for you
- regulators, dispute resolution bodies, courts and law enforcement agencies (such as ASIC, AFCA and the OAIC) where the law requires or allows it
- a buyer of our business, on a confidential basis.

We do not sell personal information.

6. Overseas disclosure

Some of the people and organisations in section 5 are outside Australia. They are likely to be in the United Kingdom, the European Union, the United States, India, Malaysia, New Zealand, the Philippines and Vietnam.

If the insurer of your policy, or its reinsurer, is in another country, we may also disclose your information to that country.

Overseas insurers. If we recommend an insurer located outside Australia, we will tell you where it is located when we give you our advice. If that country does not have privacy protections substantially similar to Australia's, we will ask for your consent before we send your information.

For everyone else, we take reasonable steps to make sure overseas recipients handle your information in line with the Australian Privacy Principles, usually through contract. Contact the Privacy Officer if you want to know more about a particular overseas recipient.

7. Artificial intelligence and automated decisions

We and our service providers may use artificial intelligence (AI) tools to support our work, for example to draft correspondence, summarise documents, take notes and transcribe calls, prepare quote comparisons, or run chat or voice tools on our website. Personal information used in these tools is handled under this policy, including section 6. We take reasonable steps to make sure the AI tools we use meet appropriate standards of security and confidentiality.

A person in our business makes every decision about your insurance. We do not use computer programs to make decisions about you on their own.

Some of our systems, including broking platforms and AI tools, help us make decisions by gathering, comparing or summarising information. Examples are preparing quote comparisons across insurers or summarising your insurance needs. This helps us decide which insurers to approach and what cover to recommend. These tools use the information you give us about you, your business and what you want insured, and your insurance and claims history. **A person reviews the result before any advice or recommendation reaches you.**

Insurers make their own decisions about whether to offer cover, the premium and claims, and some use automated systems to do so. Their privacy policies explain how.

8. Our website, cookies, advertising and social media

Our website uses cookies and similar tools, including analytics tools (such as Google Analytics), advertising and conversion-tracking tools (such as Google Ads and Meta Pixel), and forms connected to our CRM.

These tools record how you use our website, such as the pages you visit, your device and browser, your approximate location and how you arrived. The platforms may link this to your account with them so they can show you our ads, and may use it under their own privacy policies. Information you enter in a form goes into our CRM.

You can block or delete cookies in your browser settings, and turn off personalised ads in your Google and Meta account settings. Some parts of our website may not work properly without cookies.

We have pages on social media platforms such as Facebook and LinkedIn. Those platforms handle information you share with them under their own privacy policies.

No internet transmission is completely secure, but once we receive your information we take reasonable steps to protect it. Our website may link to other websites; this policy does not apply to them.

9. Calls, SMS, marketing and events

- **Calls.** We may record calls for quality, training and record-keeping. We will tell you at the start of a recorded call.

- **Marketing.** You can opt out of marketing emails using the unsubscribe link, or opt out of all direct marketing, including using your information to target marketing to you, by contacting the Privacy Officer.
- **Events.** We sometimes take photos at our events and may use them in our marketing and on social media. Let us know if you do not want your image used.

SMS messages. If you opt in to SMS from Polaris Risk Services:

- we may send you appointment reminders, updates and promotions, as described when you opt in
- how many messages you receive depends on how you deal with us and use our services
- standard message and data rates from your carrier may apply
- you can stop messages at any time by replying STOP to any SMS
- for help, call 07 3667 8230 or email admin@polaris.com.au
- we handle your personal information under this policy
- we may change these SMS terms by updating this policy on our website. If you keep receiving messages after a change, you accept the updated terms.

10. Security and how long we keep it

We take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, change or disclosure. These steps include access controls, staff training and contracts with our service providers. Information is held on our systems and our service providers' systems, and only people who need it for the purposes in this policy can access it.

We generally keep records for at least 7 years after our dealings with you end, because financial services law requires it and because claims can arise years later. When we no longer need information, we destroy it or de-identify it.

11. Data breaches

If a data breach involving your information is likely to cause you serious harm, we will notify you and the Office of the Australian Information Commissioner, as the Notifiable Data Breaches scheme requires.

12. Accessing and correcting your information

You can ask for access to the personal information we hold about you, or ask us to correct it, by contacting the Privacy Officer. We will respond within 30 days. Making a request is free; we may charge a reasonable fee for the cost of giving access, and will tell you before we do.

If we refuse a request, we will tell you why in writing and how to complain. Please tell us promptly if your details change.

13. Complaints

If you are unhappy with how we have handled your personal information, contact the Privacy Officer. We will acknowledge your complaint within 1 business day and aim to resolve it within 30 days, in line with our Complaints Procedure, which is on our website.

If you are not satisfied with our response, you can contact:

- **Australian Financial Complaints Authority (AFCA):** www.afca.org.au | 1800 931 678 | info@afca.org.au | GPO Box 3, Melbourne VIC 3001
- **Office of the Australian Information Commissioner (OAIC):** www.oaic.gov.au | 1300 363 992

14. Contact the Privacy Officer

Privacy Officer, Polaris Risk Services Pty Ltd	
Name	Jose Ponce De Leon
Phone	07 3667 8230
Email	admin@polaris.com.au
Post	Level 2, 67 Lytton Road, East Brisbane QLD 4169

15. Employee records and changes to this policy

Employee records are generally exempt from the Privacy Act, but we protect our employees' personal information in the same way.

We may update this policy from time to time. The current version is always available on our website, and you can ask the Privacy Officer for a free copy.

Polaris Risk Services Pty Ltd
ABN 62 689 768 634 | AFSL 700131
Level 2, 67 Lytton Road, East Brisbane QLD 4169
Phone 07 3667 8230 | Email admin@polaris.com.au | www.polaris.com.au