

Financial Services Guide And Privacy Policy

**Date: 22 January 2016
Version 1.1**

FINANCIAL SERVICES GUIDE AND PRIVACY POLICY

Purpose and Content

This Financial Services Guide (“FSG”) is dated 22 January 2016 and is provided to you by CYTI (Australia) Pty Ltd (“CYTI”, “we”, “our”, “us”), trading as Bright Trip Insurance, to inform you of the financial services provided by us and to comply with our obligations as the holder of Australian Financial Services (“AFS”) Licence number 470202.

This FSG is meant to assist you to decide whether to use our services and to explain:

- Who we are.
- What financial services we provide and the products to which those services relate.
- What our responsibilities are and what type of advice we give.
- How you can instruct us.
- What you can expect to pay for the financial services.
- What remuneration and other benefits may be paid to us, our employees or others.
- What to do if you have a complaint, and how it will be dealt with.
- For what purpose we use your contact data.
- How you can contact us.

This FSG contains only general information about the services we offer. If you still have any questions after reading this FSG, please contact us. Our contact details are listed at the end of this document.

What other disclosure documents and statements will I receive?

Although it is not our policy to provide personal advice, if we do provide you with personal advice or further assistance in selecting products or services having regard to your particular circumstances and needs, we will, where we are required to do so under the law, issue you with a Statement of Advice (“SOA”) that will set out the personal advice we have given you, including any recommendations and information about any fees, commissions, associations or relationships which might influence the provision of that advice.

If we provide you with a SOA, we may provide further advice to you after we have given you a SOA. If we have not provided you with a record of the further advice you may request, either verbally or in writing, a record of further advice within seven (7) years (or as prescribed by law) of us providing the further advice.

Where we arrange for the issue of a financial product to you, you will receive a Product Disclosure Statement (“PDS”) or other relevant disclosure documents that include information about the product so that you can make an informed decision whether to acquire the product. It would include any relevant terms, significant risks and costs associated with the supply of that financial product.

How you can instruct us and your obligations?

We will accept order instructions through our website and also via telephone, email or other applicable electronic device.

You must check and confirm with us that instructions sent electronically, have in fact been received by us.

You must review any confirmation or statement we send to you immediately upon receipt to ensure its accuracy and report any discrepancies to us.

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Who are we and what services are we authorised to provide?

CYTI was incorporated on 20 February 2014 and is a wholly owned subsidiary of Pear Tree Investments (UK) Ltd, an entity registered and domiciled in the United Kingdom.

CYTI provides a platform where clients are given an opportunity to compare various travel insurance policies and quotes on its website.

Travel insurance is an insurance product designed to cover the costs and reduce the risk associated with unexpected events during domestic or international travel. Travel insurance covers the insured in the following main categories:

- Costs associated with medical expenditure.
- Monetary losses arising during the insured's travel.
- Trip cancellations

CYTI compares rates from different insurance providers and helps direct retail and wholesale clients to the appropriate providers depending on their needs.

CYTI is responsible for its financial services and does not act on behalf of any other licensee.

CYTI is the holder of AFS Licence number 470202 with authorisations to provide the following financial services:

Provide financial product advice for the following classes of financial products:

- General insurance products; and

Deal in a financial product by issuing, applying for, acquiring, varying or disposing of a financial product in respect of following classes of financial products:

- General insurance products; and

Deal in a financial product by applying for, acquiring, varying or disposing a financial product on behalf of another person in respect of the following classes of products:

- General insurance products; and

to retail and wholesale clients.

What are our responsibilities and what type of advice do we give?

It is not our policy to provide personal advice. It is our policy to ONLY provide general advice and information regarding financial products and services that can be dealt through us. This information or advice does not take into account your particular objectives, financial situation or needs and because of that you should, before acting on the advice, consider the appropriateness of the advice having regard to your objectives, financial situation and needs. However, it is important to note that should there be circumstances where we do provide you with personal advice, then we will, where we are required to do so under the law, issue you with a SOA that will set out the personal advice we have given you, including any recommendations and information about any fees, commissions, associations or relationships which might influence the provision of that advice.

The costs, remuneration and other benefits that may be received by us, or our employees and others

The information in this section is subject to change and does not include information in relation to taxes or duties that you may be required to pay in relation to an investment. Unless otherwise states, all fees, charges, commissions and benefits disclosed in the FSG are exclusive of the Goods and Services Tax ("GST").

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As the issuer of any insurance policy, we will charge you an agreed premium for that product based on a number of factors including your risk profile and circumstances (plus relevant taxes and charges) which we will calculate and inform you of before you buy the product.

In certain cases, we may have a relationship with a third party who we may pay for referring you to us. We may pay the third party a referral fee which is a percentage of the net premium of an insurance policy (calculated as the total premium payable less GST and stamp duty).

This referral fee is already incorporated into the premium payable by you and the amount can vary, depending on the type of arrangement CYTI has with the third party and the type of insurance product you purchase. The amount may include a reimbursement of expenses incurred in performing the role.

Our employees and directors may in turn be remunerated on a commission basis for the services provided to you. Their remuneration is included in the commissions referred to above. Where your business has been referred to CYTI or your trade instructions require the use of a third party, CYTI may be required to share a percentage of the commission or other charge with other parties. CYTI has contractual relationships with related bodies corporate – all such dealings are conducted on an arm's length basis.

Disclosure of any relevant conflicts of interest

Subject to disclosures in any PDS or other transaction documents we provide to you, we do not have any relationships or associations which might influence us in providing you with our services.

As per above, CYTI may arrange for you to be supplied with financial services and products issued by non-related product issuers. CYTI may receive a fee, commission payment, or other form of remuneration, or other benefits from these non-related issuers as a result of you investing in one of their products or services.

If you have a complaint, how it will be dealt with?

If you wish to make a complaint, the Operations Director (MS Maxine Baker) can be contacted on 0432 682 752 or at maxine.baker@cyti.com.au

CYTI has a formalised client complaint resolution procedure. All complaints are reviewed and investigated by our Compliance Officer. If you make a complaint, our first response will be to contact you to discuss the complaint and to register a formal record of such complaint. We will try to resolve your complaint quickly and fairly.

If, despite our best efforts, you believe your complaint has not been satisfactorily dealt with, we offer our clients to use an independent industry arbiter, namely, the Financial Ombudsman Service ("FOS").

You can contact FOS by writing to:

Financial Ombudsman Service

GPO Box 3

Melbourne VIC 3001

Toll Free: 1300 780 808

Facsimile: (03) 9613 6399

Website: www.fos.org.au

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The FOS website also permits you to register or lodge a dispute online.

Professional Indemnity Insurance.

Our compensation arrangements comply with the legal requirements set out in Section 912B of the Act and ASIC Regulatory Guides 126. As required, we maintain professional indemnity insurance coverage in relation to the financial products and services we provide. Our coverage includes any claims in relation to the conduct of present and former representatives and/or employees.

For what purpose do we use your contact data.

CYTI is committed to protecting your Personal Information in accordance with the Australian Privacy Principles pursuant to the *Privacy Act 1988* (Cth) ("the Privacy Act"). Our Privacy Policy contains up-to-date information about our privacy practices and procedures. A copy of this policy can be sent to you upon written request to our Privacy Officer at Level 5, 63 York Street | Sydney NSW 2000.

Generally, CYTI will not disclose your Personal Information without your consent, except as authorised under its client agreement, its Terms and Conditions, and/or as authorised or required under any Australian law or regulation.

How you can contact us?

Telephone: 0432 682 752

Mail: Level 5, 63 York Street | Sydney NSW 2000

Email: info@cyti.com.au

1. Privacy Policy

This Privacy Policy sets out how CYTI (Australia) Pty Ltd (“we” or “us”) collects, stores, uses and discloses personal information.

This Policy is designed to tell you what will happen to the information you provide to us through this website or through any other form of communication with us. Please read this entire Privacy Policy carefully before using this website or submitting personal information to us.

We respect your rights to privacy under the Privacy Act 1988 (Cth) (Act) and we comply with all of the Act’s requirements in respect of the collection, management and disclosure of your personal information.

Personal Information

This Privacy Policy concerns any personal information or sensitive information of yours, which is provided to us.

The term “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.

We also collect and maintain your sensitive information which includes information about your health, genetics, membership of any trade unions or professional associations and any criminal convictions you may have. We will take reasonable steps to ensure that we only collect sensitive information (including health information) that is relevant for the required purposes of collection, and does not unreasonably intrude on your personal affairs.

How your personal information is collected

Where it is possible, we collect your personal information directly from you. We may do this in a number of ways, including:

- directly from you, when you provide it to us via our website;
- from publicly available resources;
- by analysing our own records of your use of our services;
- third parties who you have asked to provide your personal information to us;
- people who are involved in a claim or assist us in assessing, investigating, processing or settling claims, including witnesses, medical service providers, external claims data collectors and verifiers;
- law enforcement, dispute resolution, statutory and regulatory bodies;
- marketing organisations, including through the use of purchased lists;
- industry databases;
- through social media vehicles such as Facebook, Twitter and others; and
- via online product reviews.

Unless we are required or permitted by law to collect sensitive information about you, we will only do so by obtaining your consent.

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If you nominate individuals to be covered by your insurance policy, you should direct them to this Privacy Policy and make them aware of the content of any privacy notice we provide you. If you complete an online application form, we will only collect the information that you enter once you have submitted your online application. If at any stage you decide to cancel your application prior to submitting, the information you have entered up to that point will be automatically deleted.

What personal information do we collect and hold?

The personal information collected and maintained by CYTI (Australia) Pty Ltd includes your name, date of birth, address, postcode, telephone numbers, email address, health information (such as information about pre-existing medical conditions) and information on how you use, and your preferences regarding, travel insurance and similar products and services. If we are not provided with the personal information that we request, we may not be able to satisfy your request or provide our products or services to you.

We collect, hold, use and disclose your personal information for the purposes of providing our products and services and managing our business. This may include:

- verify your identity;
- assessing insurance risks;
- facilitate provision of our products and services to you (including to facilitate a claim or an assistance matter);
- address or respond to any requests from you;
- inform you of existing and proposed products and services which we provide;
- better understand your needs in the area of travel insurance;
- conducting customer research and analytics in relation to our service and products, and improving our service and products;
- handling complaints and disputes;
- detecting, investigating and preventing fraud.
- assess the performance of the website and to improve the operation of the website;
- conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- Marketing our service and products;
- to provide your updated personal information to our related bodies corporate, contractors or service providers; and
- comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority.

We will not use your information for purposes other than those described above unless we have your consent or as permitted by law (including for law enforcement or public health and safety reasons).

Who do we disclose your personal information to and why?

Your personal information (but not sensitive information) may only be disclosed in certain circumstances, such as where we are required or authorised by law or where you have consented to us doing so.

This may include where the use or disclosure is reasonably necessary:

- others in accordance with a request made by you;
- our related companies and business partners;
- persons engaged in providing us with professional, business, technology and corporate services, when reasonably required;
- Loss adjusters and assessors;
- Investigators;
- Insurance reference bureaus etc; and
- Lawyers

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When making such a disclosure we will take reasonable steps to ensure that the recipient is bound by privacy obligations.

Unless you consent, we otherwise will not disclose your personal information to third parties.

We may share personal information with parties outside of Australia. Third parties outside of Australia may include:

- Claims handlers and assistance companies
- Insurers and reinsurers and companies related to us

The parties referred to above may be located in United Kingdom. All International transfers of information will be made in accordance with the Australian Privacy Principles.

Disclosure of personal information outside of Australia

We will only send your personal information outside Australia:

- to assist in locating a missing person;
- to establish, exercise or defend a legal or equitable claims;
- for the purpose of a confidential alternative dispute resolution; and
- for other matters identified in the Act.

We also may disclose your personal information to:

- our employees, related bodies corporate, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide services to;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- others in accordance with a request made by you;
- our related companies and business partners; and
- persons engaged in providing us with professional, business, technology and corporate services, when reasonably required (including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants).

When making such a disclosure we will take reasonable steps to ensure that the recipient is bound by privacy obligations.

We will not disclose your sensitive information for any purpose, other than the purpose for which it was collected unless you otherwise consent.

How do we hold your personal information?

We may hold your personal information in a number of ways, including:

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

Direct marketing and your privacy

Occasionally we may use your personal information to advise you about or offer you other products or services that may be relevant and of interest to you. If you do not want to receive these offers from us or on behalf of our business partners please use the opt-out facility on our website.

We do not use or disclose sensitive information for the purposes of direct marketing unless we have previously obtained your consent.

Your consent

By using this website or otherwise providing us directly, or through others, with personal information, you acknowledge that you have read and understood this Privacy Policy and consent to the collection, use, and disclosure of that information in accordance with this Privacy Policy, the Privacy Act 1988 (Cth) as amended (including the Australian Privacy Principles) and other applicable privacy laws.

Our Website

We may collect information about your visit to our site to assist us to measure and improve our website. Examples of information that we collect include: day and time of your visit, whether you have visited our website previously, whether you used a search engine to find us and some geographical information about what country and state you are in.

We use Google Analytics to collect visitor information so that we can better understand how to improve our products and services for you. One of the primary methods used by this tool is the placement of cookies. Cookies are small information files that an end user's web browser places on their computer when a website is visited. For information on disabling these cookies, please go to the privacy settings section within your browser. In addition to the session cookie, Google Analytics uses other data collection methods such as appending query strings to an image request. We store the data generated by Google Analytics securely and do not share it with third parties.

CYTI (Australia) Pty Ltd also use other external companies for the following purposes:

- for web hosting services for this website; and/or
- to gather non-personal information (using cookies) in order to evaluate the website's effectiveness, for example online marketing activities.

Security

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

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Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Unsolicited information

If unsolicited personal information is received by us, we will determine whether the information could have been collected if it had been solicited in the first place. If the information could have been collected, all principles under this Policy applied to solicited personal information will apply to the unsolicited information received.

If we determined that the information collected could not have been collected by us, we will aim destroy or de-identify the information as soon as practicable, but only if lawful and reasonable to do so.

Access and correction

CYTI (Australia) Pty Ltd aims to ensure that your personal information is accurate, up to date, complete and relevant. If you would like to seek access to, or revise, your personal information, or feel that the information we currently have on record is incorrect or incomplete, please contact us using the following contact details:

info@cyti.com.au

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

We will acknowledge your request within 10 business days and will respond to your request within a reasonable time.

Inquiries and complaints

If you believe that we have interfered with your privacy in our handling of your personal information or if you have any questions about our processes for handling your information, you may send your queries or lodge a complaint by contacting us on the below contact details:

Post: CYTI (Australia) PTY Limited, Level 5, 63 York Street | Sydney NSW 2000

Email: info@cyti.com.au

We will attempt to respond to your query and resolve your complaint in accordance with our Complaints Resolution Process. You can obtain a copy of our Complaints Resolution Process by contacting us.

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If you are unhappy with the resolution of your complaint or with the way that CYTI (Australia) Pty Ltd has handled your complaint through the Complaints Resolution Process, you may be able to refer the matter to the Financial Ombudsman Service (FOS) subject to its Terms of Reference or the Office of the Australian Information Commissioner. The contact details for these bodies are as follows:

Financial Ombudsman Service Limited

GPO Box 3

Melbourne VIC 3001

Tel: 1300 78 08 08

Web: www.fos.org.au

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Tel: 1300 363 992

Web: www.oaic.gov.au

How to contact us

If you wish to exercise your right to opt-out of receiving our marketing materials, or you have any questions or concerns about this Privacy Policy or our information practices (including whether and what type of health information we hold about you), please contact us at:

Info@cyti.com.au

Changes to this Privacy Policy

We may make changes to this Privacy Policy from time to time for any reason. We will publish changes to this Privacy Policy on this website