

The Privacy Commissioner
Office of the Australian Information Commissioner
GPO Box 5218
SYDNEY NSW 2001

By email: consultation@oaic.gov.au

12 December 2013

Dear Commissioner

DRAFT AUSTRALIAN PRIVACY PRINCIPLES GUIDELINES 12-13

The Insurance Council of Australia¹ (Insurance Council) appreciates the opportunity to provide comments on the the third tranche of the draft guidelines (Draft Guidelines) on the Australian Privacy Principles (APPs) 12-13.

The Insurance Council has discussed the Draft Guidelines with its members and can advise that there are no issues of concern that we wish to raise.

If you have any questions or comments in relation to our submission please contact John Anning, the Insurance Council's General Manager Policy, Regulation Directorate, on tel: 02 9253 5121 or email: janning@insurancecouncil.com.au.

Yours sincerely



Robert Whelan
Executive Director & CEO

¹The Insurance Council of Australia is the representative body of the general insurance industry in Australia. Our members represent more than 90 percent of total premium income written by private sector general insurers. Insurance Council members, both insurers and reinsurers, are a significant part of the financial services system. September 2013 Australian Prudential Regulation Authority statistics show that the private sector insurance industry generates gross written premium of \$40.4 billion per annum and has total assets of \$112.6 billion. The industry employs approximately 60,000 people and on average pays out about \$92.5 million in claims each working day.

Insurance Council members provide insurance products ranging from those usually purchased by individuals (such as home and contents insurance, travel insurance, motor vehicle insurance) to those purchased by small businesses and larger organisations (such as product and public liability insurance, professional indemnity insurance, commercial property, and directors and officers insurance).