

TARGET MARKET DETERMINATION



Product	Freely. (PDS Effective 29 September 2021)
What is a Target Market Determination (TMD)	<p>We're required to have Target Market Determinations under the Corporations Act 2001. A Target Market Determination is designed to outline the target market for a product by describing:</p> <ul style="list-style-type: none">• who the product is designed for and their likely objectives, financial situation and needs• who the product is not designed for• distribution conditions for the product• reporting criteria, and• review conditions for this product.
Disclaimer	<p>In this document the terms “we” and “our” refer to Zurich Australian Insurance Limited ABN 13 000 296 640, AFSL 232507.</p> <p>The TMD does not form part of the terms of the cover. The examples of who the product is not designed for and who may fall outside the target market is not exhaustive.</p> <p>If you purchase this product and it is not designed for your circumstances, you may not get:</p> <ul style="list-style-type: none">• the value from it that you expected, or• any value from the product at all. <p>For more help in deciding if this product is right for you and for additional details on the product benefits and features please refer to the Product Disclosure Statement (PDS).</p>

1. Who is this travel insurance product designed for, and what are the likely objectives, financial situation, and needs, of customer in this target market?

The Freely travel insurance product can provide insurance for people who travel in Australia or overseas with a choice of protections. These protections are called plans. The Freely product is designed for travellers who want the flexibility to choose options to vary their cover, these options are called Boosts.

This Target Market Determination (TMD) sets out the target market for:

- Cancellation Plan
- On-Trip Policy – International Trips
- On-Trip Policy – Domestic Trips

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Cancellation Plan

2. Who is the product designed for?

This product is a group policy between the insurer and Freely. The policy provides pre-trip cancellation coverage to customers who meet eligibility criteria and **activate the Cancellation Plan in the Freely App** and are therefore beneficiaries of the group policy. It is designed for people booking a trip to travel **overseas or in Australia** and who want to be covered against financial loss caused by certain unforeseen incidents that may cause them to cancel their leisure travel. These people are willing to accept the provided level of cover as appropriate for their circumstances.

		This product is designed for people who:	This product would not be suitable for people who:
Cancellation Plan	Eligible people	<ul style="list-style-type: none"> ✔ Are an Australian resident or visa holder meeting the usership eligibility criteria outlined in the Freely App ✔ Are under 60 years of age ✔ Are a registered user of the Freely App 	<ul style="list-style-type: none"> ✘ Are buying travel insurance with the intention of making a claim for something that has already happened that affects their travel plans and/or leads them to incur costs or suffer a financial loss
	Health related attributes	<ul style="list-style-type: none"> ✔ Are less than 24 weeks pregnant while travelling, have a low risk pregnancy and only require cover for unexpected, serious pregnancy complications e.g. miscarriage 	<ul style="list-style-type: none"> ✘ May have an existing medical condition(s) ✘ Require cover for any medical or dental expenses if something happens to them on their trip ✘ Are having a medical condition investigated or have signs or symptoms of a medical condition but have not seen a doctor yet ✘ Require cover for childbirth or medical care for a newborn
	Trip cancellation related attributes	<ul style="list-style-type: none"> ✔ May want cover for prepaid travel and accommodation costs paid for after activation of the Cancellation Plan up to \$5,000 that would not be refunded if the trip is cancelled or amended in certain scenarios. 	<ul style="list-style-type: none"> ✘ Require cover for circumstances known or foreseen at the time of purchasing the policy that could lead to the trip being delayed, abandoned or cancelled. This could include a location or situational event that has been publicly identified e.g. reported weather events such as a cyclone. ✘ Require cover for trips or travel booked or paid for before the cancellation plan was activated in their Freely App.

This product is subject to acceptance criteria.

This TMD was prepared 7 July 2021. It is effective from 29 September 2021.

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On-Trip Policy – International Trips

2. Who is the product designed for?

This product has been designed for people who have an **overseas trip** and want to be covered against financial loss caused by certain unforeseen incidents involving leisure travel. These people are willing to select an appropriate level of cover relevant to their own circumstances.

On-Trip Policy – International Trips	This product is designed for people who:	This product would not be suitable for people who:	
	Eligible people	<ul style="list-style-type: none"> ✔ Are an Australian resident or visa holder meeting the usership eligibility criteria outlined in the Freely App ✔ Are between 18 and 60 years of age as the primary traveller (the Freely App user) ✔ Are a traveller accompanying the Freely App user, who is 99 years and under, and meets the acceptance criteria based on age, destination and trip duration ✔ Are a registered user of the Freely App 	<ul style="list-style-type: none"> ✘ Are buying travel insurance with the intention of making a claim for something that has already happened that affects their travel plans and/or leads them to incur costs or suffer a financial loss
	Health related attributes	<ul style="list-style-type: none"> ✔ Require cover for emergency medical expenses overseas for a new medical condition or injury ✔ Are less than 24 weeks pregnant while travelling, have a low risk pregnancy and only require cover for unexpected, serious pregnancy complications e.g. miscarriage 	<ul style="list-style-type: none"> ✘ May have an existing medical condition(s) ✘ Are travelling to have routine, continuing, cosmetic or elective medical or dental procedures or treatment ✘ Require cover for childbirth or medical care for a newborn
	Trip cancellation related attributes	<ul style="list-style-type: none"> ✔ May want cover for prepaid travel and accommodation costs up to \$5,000 (or a higher limit with an additional premium) that would not be refunded if the trip is cancelled or amended in certain scenarios 	<ul style="list-style-type: none"> ✘ Require cover for circumstances known or foreseen at the time of purchasing the policy that could lead to the trip being delayed, abandoned or cancelled. This could include a location or situational event that has been publicly identified e.g. reported weather events such as a cyclone
	Activities	<ul style="list-style-type: none"> ✔ May be travelling on a multi-night cruise (an additional premium applies) ✔ May be participating in high risk activities such as motorcycle riding and winter sports (an additional premium applies). 	<ul style="list-style-type: none"> ✘ May require cover for participating in sports activities on the trip in a professional capacity ✘ Require cover for high risk activities that are excluded in the PDS.

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On-Trip Policy – Domestic Trips

2. Who is the product designed for?

This product has been designed for people travelling **in Australia** who want to be covered against financial loss caused by certain unforeseen incidents involving leisure travel. These people are willing to select an appropriate level of cover relevant to their own circumstances.

	This product is designed for people who:	This product would not be suitable for people who:
On-Trip Policy – Domestic Trips	<p>Eligible people</p> <ul style="list-style-type: none"> ✓ Are an Australian resident or visa holder meeting the usership eligibility criteria outlined in the Freely App ✓ Are between 18 and 60 years of age as the primary traveller (the Freely App user) ✓ Are a traveller accompanying the Freely App user, who is 99 years and under, and meets the acceptance criteria based on age, destination and trip duration ✓ Are a registered user of the Freely App 	<ul style="list-style-type: none"> ✗ Are buying travel insurance with the intention of making a claim for something that has already happened that affects their travel plans and/or leads them to incur costs or suffer a financial loss
	<p>Health related attributes</p> <ul style="list-style-type: none"> ✓ Are less than 24 weeks pregnant while travelling, have a low risk pregnancy and only require cover for unexpected, serious pregnancy complications e.g. miscarriage 	<ul style="list-style-type: none"> ✗ May have an existing medical condition(s) ✗ Require cover for any medical or dental expenses if something happens to them on their trip ✗ Require cover for childbirth or medical care for a newborn
	<p>Trip cancellation related attributes</p> <ul style="list-style-type: none"> ✓ May want cover for prepaid travel and accommodation costs up to \$5,000 (or a higher limit with an additional premium) that would not be refunded if the trip is cancelled or amended in certain scenarios 	<ul style="list-style-type: none"> ✗ Require cover for circumstances known or foreseen at the time of purchasing the policy that could lead to the trip being delayed, abandoned or cancelled. This could include a location or situational event that has been publicly identified e.g. reported weather events such as a cyclone
	<p>Activities</p> <ul style="list-style-type: none"> ✓ May be participating in high risk activities such as motorcycle riding and winter sports (an additional premium applies). 	<ul style="list-style-type: none"> ✗ May require cover for participating in sports activities on the trip in a professional capacity ✗ Require cover for high risk activities that are excluded in the PDS.

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Distribution of the product

3. Who is this product distributed through and are there any conditions of this distribution?

This product is designed to be distributed by Cover-More and Freely, to Freely customers.

Travellers can purchase this product via a direct channel (e.g. the Freely App).

Only these parties are authorised to distribute this product as they understand the market this product has been designed for, have been trained in the relevant acceptance criteria and have the appropriate levels of authority.

Cover-More and Freely are required to take reasonable steps to ensure that the product is distributed to a customer in such a way that it is likely to meet the customer's objectives, financial situation and needs.

Conditions and restrictions that may impact the distribution of this product include:

- the type of platforms used to sell the product
- compliance with underwriting criteria, and
- regulatory requirements and obligations.

Reporting

Freely works with Cover-More to ensure that this product is distributed appropriately to customers in accordance with this TMD.

Cover-More is required to report issues to the product issuer in the following circumstances:

	Reportable matter	When must it be reported
Complaints	The number of complaints received by the distributor about the product in the reporting period and the nature of the complaints.	Every 3 months
Significant dealings identified	If there have been any significant dealings by the distributor that are inconsistent with our target market.	As soon as practicable after becoming aware of the matter, and within 10 business days
Claims data	If there have been any significant claims denials where the traveller fell outside our product target market	Every 3 months + 10 business days

Review

4. When will we review this document?

This TMD may be reviewed at any time, including when specific events or circumstances occur. To ensure that the TMD continues to be appropriate, it may be reviewed for the following reasons:

- Customer experience and feedback
- Claims experience of this product
- If we make a material change to the cover provided by the product
- Changes to how we sell this product
- A material amendment to our product governance framework
- Amendments to our underwriting guidelines, pricing or reinsurance requirements
- Feedback or changes in our distribution arrangements
- Changes to our broker or intermediary arrangements
- An amendment to laws or guidance from industry bodies

In all other circumstances:

This TMD may also be reviewed in response to any complaints we receive about this product. This includes complaints that are raised with our distributors in which case, we will review the product and this TMD within 3 months of receiving any such complaint.

First review period

We will review this TMD within 12 months from the effective date to ensure it remains appropriate.

Ongoing review periods

We will review this TMD at least every 2 years following the first review period.

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