

Target Market Determination

Seniors Pet Insurance – Top, Essential and Accident Only Cover

Product Name

Seniors Pet Insurance – Top, Essential and Accident Only Cover Product Disclosure Statement (**PDS**) dated 13 September 2021.

What is a Target Market Determination?

This Target Market Determination (**TMD**) sets out the class of customers the product has been designed for and is suitable for. It sets out the target market for the product, conditions and restrictions placed on its distribution, events and circumstances that would reasonably suggest that the TMD is no longer appropriate and review periods and reporting obligations for the TMD.

This TMD does not provide any financial product advice on the product and does not take into consideration the objectives, financial situation and needs of individual customers.

The terms and conditions of the product are set out in the PDS. This TMD does not form part of the insurance contract and is not a summary of the product's terms and conditions. Customers should review the PDS before making any decision in relation to the product.

Any terms used in this TMD that are defined in the Corporations Act 2001 (Cth) have the same meaning as in that Act.

This TMD is available to any person at [seniors.com.au](https://www.seniors.com.au)

Effective date of this TMD: 29 June 2023

Product description and key attributes

The product has been designed for people who want different choices of cover towards eligible veterinary expenses experienced by pet cats or dogs. The product has 3 levels of cover. These are briefly described below:

	Accident Only Cover	Essential Cover	Top Cover
Cover Type	Cover for specified accidental injuries only	Cover for both specified accidental injuries and illnesses	
Benefit Percentage	Up to 80% of eligible vet bills	Up to 75% of eligible vet bills	Up to 80% of eligible vet bills
Annual Benefit Limit	Up to \$8,000 per year	Up to \$12,000 per year	Up to \$12,000 per year
Sub-limits	Some condition related sub-limits apply to conditions such as cruciate ligament surgery	Some condition related sub-limits apply to conditions such as tick paralysis and cruciate ligament surgery	Some condition related sub-limits apply to conditions such as tick paralysis and cruciate ligament surgery
Option(s)	Nil	Nil	Routine Care

Other key attributes of this product include:

- it does not provide comprehensive cover for preventative care costs and general pet maintenance costs like grooming and pet food; and
- cover is subject to annual limits, sub-limits (which can increase from time to time to help keep pace with the cost of veterinary care), terms, conditions and exclusions. Examples of key exclusions include waiting periods at the inception of a new policy and coverage exclusions for chronic pre-existing conditions.

Likely objectives, financial situation and needs of customers in the target market

The likely objectives, financial situation and needs of customers in the target market is contribution towards eligible veterinary expenses that they incur, to help ensure their pet can receive appropriate treatment and to reduce (and not cover in full) the cost to the customer of that treatment.

Customers in the target market will be able to afford to pay:

- premiums for the product, which will increase from year to year;
- the full amount for treatment upfront to the vet before seeking claims reimbursement for the eligible expenses, unless using the GapOnly® claims payment platform (in which case, customers need to be able to pay upfront the 'gap' payment — the 'gap' means the difference between the vet's invoice for eligible expenses and the claim benefit calculated under the policy terms and conditions, if any); and
- any veterinary expenses above the accepted claim amount, including:
 - costs above the applicable benefit percentage (up to 75% or 80% of eligible veterinary expenses depending on the selection chosen);
 - costs above the applicable annual benefit limit (up to \$8,000 or \$12,000 per year depending on the selection chosen); and
 - costs above the applicable sub-limits.

Target market for the product

The overall target market for the product applies to all levels of cover available. Each level of cover also has parameters which apply in addition to the overall target market.

Overall target market

Who this product may be suitable for	Who this product may not be suitable for
<p>A person is in our target market for this product if they:</p> <ul style="list-style-type: none"> ■ have a domestic dog, cat or hybrid that is legally available in Australia; ■ want cover towards the costs associated with specified accidental injuries that their pet may experience, such as injury suffered as a result of a motor vehicle accident, burn or electrocution and traumatic ligament or tendon injury; and ■ can afford to pay the applicable premium, upfront vet expenses before submitting a claim (unless GapOnly® is used), and veterinary expenses that are above the accepted claim amount. 	<p>A person will not be in our target market if they:</p> <ul style="list-style-type: none"> ■ have a pet which has sustained chronic pre-existing conditions which are likely to require ongoing veterinary treatment and want cover for those treatment costs; ■ want to cover the costs of treatment for illnesses or accidents not covered by this policy, or other maintenance costs associated with pet ownership; and/or ■ cannot afford to pay the applicable premium, upfront vet expenses before submitting a claim (unless GapOnly® is used), and/or veterinary expenses that are above the accepted claim amount.

Target market for each level of cover

In addition to the overall target market, these additional parameters apply based on the level of cover selected.

Accident Only Cover (specified accidental injury only)

Who this level of cover may be suitable for	Who this level of cover may not be suitable for
<p>A person is in our target market for this level of cover if they want:</p> <ul style="list-style-type: none"> ■ up to 80% of their eligible veterinary expenses covered up to \$8,000 per policy period. 	<p>A person will not be in our target market for this level of cover if they:</p> <ul style="list-style-type: none"> ■ want cover for any illness that a pet may experience; or ■ do not want sub-limits or want different sub-limits to apply for treatment for cruciate ligament conditions.

Essential Cover (specified accidental injury and illness)

Who this level of cover may be suitable for	Who this level of cover may not be suitable for
<p>A person is in our target market for this level of cover if they want:</p> <ul style="list-style-type: none"> ■ cover towards the costs associated with treating a range of illnesses, such as cancer treatments and other temporary and chronic conditions; and ■ up to 75% of their eligible veterinary expenses covered up to \$12,000 per policy period. 	<p>A person will not be in our target market for this level of cover if they:</p> <ul style="list-style-type: none"> ■ do not want sub-limits or want different sub-limits to apply for treatment for tick paralysis or cruciate ligament conditions.

Top Cover (specified accidental injury and illness)

Who this level of cover may be suitable for	Who this level of cover may not be suitable for
<p>A person is in our target market for this level of cover if they want:</p> <ul style="list-style-type: none"> cover towards the costs associated with treating a range of illnesses, such as cancer treatments and other temporary and chronic conditions; and up to 80% of their eligible veterinary expenses covered up to \$12,000 per policy period. 	<p>A person will not be in our target market for this level of cover if they:</p> <ul style="list-style-type: none"> do not want sub-limits or want different sub-limits to apply for treatment for tick paralysis or cruciate ligament conditions.

Option: Routine Care

Who this optional cover may be suitable for	Who this optional cover may not be suitable for
<p>A person is in our target market for this option if they:</p> <ul style="list-style-type: none"> want a limited amount reimbursed for specified preventative treatments and ownership costs like desexing, microchipping or heartworm control. 	<p>A person will not be in the target market for this option if they:</p> <ul style="list-style-type: none"> do not want reimbursement for these specified preventative treatments and ownership costs.

Consistency between the product and target market

This product will likely meet the likely objectives, financial situation and needs of the target market because it addresses the needs of customers in the target market to reduce the costs of eligible veterinary expenses.

Distribution conditions

This product is distributed through:

- calling the Australian Seniors call centre; or
- visiting the website of Australian Seniors; or
- visiting the website or calling the contact centre of an Australian Seniors authorised distribution partner.

Please note: Accident Only Cover is only available to renewing customers.

All enquiries made online use a quotation tool which ask the customer to answer a series of questions before finalising a quote. Customers seeking a quote via the phone will be asked a series of questions from a system-based script by a trained operator. The response to these questions will determine if the customer meets the eligibility criteria, which align with the description of the target market set out above. A sale will not progress if these eligibility criteria are not met.

All call centre representatives are provided with adequate training and their sales are routinely monitored by us to ensure that they sell the product only to customers who are in the target market.

We also have arrangements in place with Australian Seniors Insurance Agency, a trading name of Greenstone Financial Services Pty Ltd (ABN 53 128 692 884, AFSL 343079) (GFS), for ensuring that the product is distributed in accordance with this TMD.

Reviewing this document

Periodic review

We will review this TMD within 24 months from its commencement date and subsequently every 24 months thereafter.

Review triggers

We will also review this TMD if there are events or circumstances that reasonably suggest that the TMD is no longer appropriate. The triggers for this review may arise from:

- any material changes being made to the product coverage, pricing methodology, underwriting or eligibility criteria or its method of claims assessment and settlement;
- any material changes to methods of distribution;
- changes in law or regulatory guidance or industry code which may materially affect the terms of cover or distribution or regulatory feedback or concerns raised to suggest the TMD may no longer be appropriate;
- identification of systemic issues and findings, produced from quality assurance or governance processes, that may indicate an issue with the product or the appropriateness of the TMD;
- any occurrence of a significant dealing outside of the target market;
- compliance incidents and breaches that may indicate an issue with the product and the appropriateness of the TMD; or
- material deviations developing in the customer value metrics that track:
 - financial performance of the product;
 - product desirability;
 - benefit attained from the product by customers;
 - overall claims experience;
 - number and type of complaints received; and
 - customer feedback received.

Reporting

Distributors of this product are required to report the following information to us within the time specified below:

Information	Reporting period
Actual or potential significant dealings of the product outside of the target market	As soon as practicable and in any event within 10 business days of first becoming aware
Actual or potential issue of the product in breach of distribution conditions or outside of the target market	As soon as practicable and in any event within 10 business days of first becoming aware
Number and details of all complaints received	Within 10 days of the end of each quarter
Sales and marketing data including but not limited to quotes and sales made, promotions applied, cancellation of cover information	Within 10 days of the end of each quarter
Any data that we do not hold and is requested by us in writing that allows us to monitor customer value metrics as described in "Reviewing this document"	Within 10 days of the end of each month