



# **TARGET MARKET DETERMINATION (TMD)**

## COMPREHENSIVE CARAVAN INSURANCE

# Target Market Determination (TMD)

<b>Product Disclosure Statement (PDS):</b>	CIL Secure Caravan Insurance Product Disclosure Statement – PDS prepared 3 December 2020
<b>Product:</b>	Comprehensive Caravan Insurance
<b>Original Date:</b>	25/08/2021
<b>Updated:</b>	07/09/2023
<b>Issuer:</b>	AAI Limited ABN 48 005 297 807 trading as CIL Insurance
<b>AFSL number:</b>	230859

## 1. What is a Target Market Determination?

A Target Market Determination (TMD) is a determination that CIL has made to:

- describe the class of Customers this product has been designed for;
- specify product distribution conditions;
- specify TMD review periods and triggers; and
- set out reporting requirements.

This TMD assists CIL staff, our Distributors and Customers in understanding the target market for this product.

In this TMD, distribution includes the following conduct in relation to retail Customers:

- dealing in the product (e.g. issuing or arranging for the product to be issued to a Customer);
- giving a PDS or other regulated disclosure document; and
- providing financial product advice in relation to the product.

## 2. What product does this TMD apply to?

This TMD applies to the cover offered in the CIL Secure Caravan Insurance Product Disclosure Statement (PDS) and any Supplementary Product Disclosure Statement (SPDS) we may issue.

## 3. What are the key attributes of this product?

<b>Summary of Key Product Attributes</b>	<p>Customers can insure their caravan for Australia wide cover.</p> <p>This product provides:</p> <ul style="list-style-type: none"><li>• cover for accidental loss or damage to the Customer's caravan during the period of insurance caused by an incident. Accidental loss or damage cover includes cover for incidents such as hail, storm (including cyclone), fire, theft and collision;</li><li>• cover for caravan legal liability to pay compensation for death or bodily injury to another person, or loss or damage to their property arising from the use of the Customer's caravan;</li><li>• cover for personal legal liability to pay compensation for loss or damage to property owned or controlled by someone else and the death of or bodily injury to another person resulting from an incident in Australia when the caravan is the Customer's usual home.</li></ul> <p>For full details of the cover available in this product, including the conditions and exclusions that apply, CIL staff, our Distributors and Customers should read the PDS which can be found at <a href="http://www.cilinsurance.com.au">www.cilinsurance.com.au</a>.</p>
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#### 4. What is the target market for this product?

Key Eligibility Criteria	This product is suitable for:	This product is not suitable for:
Customers within target market	<p>Owners of vehicles considered to be caravans under this product including:</p> <ul style="list-style-type: none"> <li>• a caravan</li> <li>• a camper trailer</li> <li>• a slide-on trailer</li> <li>• a trailer</li> <li>• a horse float</li> <li>• a fifth wheeler</li> <li>• a tiny house on wheels</li> </ul> <p>Customers who require Australia wide cover only</p>	<p>Vehicles not considered to be caravans under this product such as, but not limited to:</p> <ul style="list-style-type: none"> <li>• motorised caravans</li> <li>• motorhomes</li> <li>• mobile homes</li> <li>• converted buses</li> <li>• semitrailers</li> </ul> <p>Customers requiring on-site only cover</p>
Use of caravan	<p>Caravans that are used for private and recreational purposes only</p> <p>Caravans that are hired under a sharing scheme or used for short-term rental (provided the 'Hire use cover' option has been purchased)</p>	<p>Caravans that are:</p> <ul style="list-style-type: none"> <li>• used for an occupation or business use</li> <li>• carrying goods for trade purposes</li> <li>• a caravan hire business or caravan trade or motor trade</li> <li>• hired under a sharing scheme or used for short-term rental where the 'Hire use cover' option has not been purchased</li> <li>• under a consignment arrangement with a commercial business</li> </ul>
Location of caravan	Caravans that are located within an acceptable postcode area	<p>Caravans that are:</p> <ul style="list-style-type: none"> <li>• not located within an acceptable postcode area including certain offshore islands</li> <li>• kept in an unacceptable location such as, but not limited to: <ul style="list-style-type: none"> <li>– public carparks</li> <li>– construction sites</li> <li>– permanently located on site at a commercial facility such as a caravan or holiday park</li> </ul> </li> </ul>
Vehicle type	Caravans that match our list of acceptable makes and models	<p>Caravans such as, but not limited to:</p> <ul style="list-style-type: none"> <li>• tiny homes on wheels in excess of 12.5 metres in length</li> <li>• trailers in excess of 8 metres in length</li> <li>• boat trailers</li> <li>• vehicles that have not had electric and gas converted to Australian standards by a qualified trade</li> </ul>
Condition of caravan	Caravans that meet our acceptable physical condition criteria and fitted with acceptable non-standard accessories or modifications	<p>Caravans that:</p> <ul style="list-style-type: none"> <li>• do not meet our acceptable physical condition criteria including, but not limited to, caravans with damage that is not wear and tear</li> <li>• are fitted with unacceptable modifications</li> </ul>

This product is designed to be consistent with the likely objectives, financial situation and needs of Customers who meet the Key Eligibility Criteria described above and who:

<b>Customer objectives and needs</b>	<ul style="list-style-type: none"> <li>• require and seek financial protection for accidental loss or damage to the caravan due to an accident, theft or any other incident not excluded by this product, including hail, storm (including cyclone), fire, theft and collision;</li> <li>• require and seek legal liability cover for death or bodily injury to another person, or loss or damage to their property, arising from the use of the Customer's caravan;</li> <li>• require and seek personal legal liability cover for loss or damage to property owned and controlled by someone else and the death of or bodily injury to another person resulting from an incident in Australia when the caravan is the Customer's usual home; and</li> </ul>
<b>Financial situation</b>	<ul style="list-style-type: none"> <li>• are able to pay premiums in accordance with the chosen policy structure, inclusive of any applicable GST, stamp duty, other government charges and any levies that apply.</li> </ul> <p>Customers can adjust the premium to suit their circumstances by choosing from a range of excesses (conditions apply), amounts of cover, options and by choosing to pay annually or by instalments.</p>

This product is likely to be consistent with the objectives, financial situation and needs of the Customers in the target market because:

- the product provides cover for the types of loss or damage that Customers in the target market are seeking to insure against;
- the product can be tailored to suit individual needs by allowing customers flexibility to choose from a range of excesses (conditions apply), options, amounts of cover and payment options; and
- the target market for the product covers those Customers who are eligible to receive cover.

## 5. When will we review this TMD?

We will complete a review of this TMD for this product by no later than the following periods:

- First review period:  
By 25/08/2023.
- Ongoing review periods:  
At least every 2 years following the first review period.
- Significant impact review:  
Within 1 year of the TMD being updated based on a Review Trigger, a significant dealing outside of target market or a material change to the product's distribution channel.

## 6. Other circumstances which will trigger a TMD review

The Review Triggers for this product are:

- if one or more terms of the product are altered and we consider that this alteration reasonably suggests that this TMD is no longer appropriate;
- an event or circumstance occurs that materially changes a factor taken into account when making the TMD that would suggest to us that the TMD is no longer appropriate, such as a change in underwriting requirements;
- the discovery of a material defect in the PDS which reasonably suggests that the TMD is no longer appropriate;
- if feedback, such as significant or systemic complaints or claims issues, is received from a Distributor or Customers who purchased the product, and we consider that this reasonably suggests to us the TMD is no longer appropriate;
- if feedback, regulatory orders or directions received from a regulator, the Code Governance Committee (CGC) or Australian Financial Complaints Authority (AFCA) suggest this TMD is no longer appropriate;
- if a change in law, regulation, or regulatory guidance that materially affects the product design or distribution of the product (or class of products that includes this product) where we consider that this reasonably suggests that this TMD is no longer appropriate;
- where significant dealings outside the TMD occurs, and we consider that this reasonably suggests that this TMD is no longer appropriate;
- if a remediation event relating to this product occurs where we consider this would reasonably suggest that:
  - this product is unsuitable for a particular cohort of Customers; and
  - the TMD may no longer be appropriate.
- if we consider, through our ongoing monitoring of product value data metrics (such as those identified in Section 9 of this TMD), that material deviations have occurred in a combination of data metrics reasonably suggesting that the product is not providing value or the TMD is no longer appropriate.

## 7. What distribution conditions apply to this product?

The following conditions apply to this product:

- those Distributors who distribute the product are required to be authorised by us to distribute this product and those arrangements must not be cancelled or suspended;
- this product must only be distributed in accordance with this TMD;
- distribution of this product must comply with all of our underwriting criteria;
- distribution of this product must be conducted through our policy administration system through the following distribution channel:
  - contact centres;
- this product cannot be distributed where this TMD is not up to date and no new TMD has been published; and
- the TMD must be current and not subject to any ASIC action that might suggest that the TMD is no longer appropriate.

Business processes including reasonable platform controls (such as knockout underwriting questions), staff and distributor training, telephone and platform scripting and quality assurance programs are designed to ensure that the product is distributed to Customers within the target market in line with the above distribution conditions.

## 8. When do Third Party Distributors who distribute our products need to report complaints about this product to us? \*

Third Party Distributors who distribute our products need to provide us information on complaints made about this product on a Quarterly basis (**Complaints Reporting Period**).

Third Party Distributors who distribute our products are required to provide to us this complaints information within 10 business days of the end of the Complaints Reporting Period.

All complaints lodged with us are handled in accordance with Suncorp's Group Complaint Management Standard.

\*This section 8 only applies to products distributed by Third Party Distributors

## 9. Information to assess TMDs and reporting periods

The table below sets out the kinds of information we need to identify, or those that Distributors who distribute our product need to provide to us, to enable us to ensure that the TMD for this product continues to be appropriate.

Information	Persons required to report	Reporting period
Complaints feedback including: <ul style="list-style-type: none"><li>• Nature of complaints</li><li>• Number of complaints</li><li>• Product category</li></ul>	Distributors / Issuer	Quarterly
Claims data including: <ul style="list-style-type: none"><li>• Average claims costs</li><li>• Claims acceptance rates</li><li>• Claims frequency</li><li>• Loss ratios</li></ul>	Issuer	Quarterly
Annual Product Review outcomes	Issuer	Annually
Sales information including: <ul style="list-style-type: none"><li>• Strike rates</li><li>• Cancellation rates</li><li>• Exception reporting</li></ul>	Issuer	Quarterly
Dealings of product outside of TMD	Distributors / Issuer	As soon as practicable but within 10 business days
Any feedback, regulatory orders or directions received from a regulator, CGC or AFCA in respect of the product or its distribution	Distributors / Issuer	As soon as practicable but within 10 business days