

## INTRODUCTION

At HBF Health Limited (HBF), we respect the privacy of your personal information. We process personal details on a daily basis and are committed to ensuring that the privacy and security of personal information remains protected. We are bound by the National Privacy Principles (**NPPs**) set out in the Privacy Act 1988.

The way HBF manages your personal information depends on the nature of your relationship with HBF, and which of HBF's products and services you access. Further information about the way we manage personal information in the context of different products and services is set out in the schedule in relation to:

- health insurance offered by HBF Health Limited;
- financial services offered by HBF Financial Services Pty Ltd; and
- general insurance on behalf of CGU Limited (CGU).

In the schedule, "HBF" refers to the particular HBF entity, which offers the relevant products and services.

The NPPs, and accordingly this Policy, do not apply to information about HBF's past and present employees which directly relates to that employment relationship.

## INFORMATION WE HOLD

HBF collects, stores and uses personal information for a variety of purposes, which will vary according to the relationship you have with HBF.

Generally, we will collect your personal information during a face-to-face interview, over the telephone, through an online form or by way of a paper based form (including application forms). From time to time additional and/or updated personal information may be collected through one or more of these methods.

Usually we will hold details of your name, address, age, telephone number, and in some cases other contact details such as a facsimile number, post office box number and/or email address. We often hold information which relates to how you choose to pay for products and services (particularly where we have a regular direct debit arrangement), which may include bank account details and credit card details. If payments are made under a payroll deduction scheme, we may hold information about your employer. We also keep information about payment history.

Some personal information is deemed to be sensitive information. HBF will treat sensitive information with particular care.

We also collect personal information about individuals who are, or are employed by, our suppliers, consultants, advisers, service providers and government agencies. Generally, if appropriate, we will tell you why we are collecting personal information when we collect it and how we plan to use it or these things will be obvious when we collect the information.

In the schedule, we summarise the other types of information we are likely to hold about you if you receive health insurance, general insurance and financial services.

## HBF'S USE AND DISCLOSURE OF PERSONAL INFORMATION

HBF uses personal information to provide you with comprehensive service in relation to its products and services. How HBF uses the personal information it collects and maintains about you will differ depending on your relationship with HBF. We make some particular comments about our use and disclosure of information in the context of health insurance, general insurance and financial services in the schedule.

Generally, HBF may disclose information:

- to service providers; and
- to governmental agencies or other regulatory bodies to assess our compliance with the law and the NPPs.

Different entities in the HBF Group may also share personal information with each other.

The Policyholder is responsible for maintaining the policy and paying premiums. So we will disclose information to them about benefit limits and treatment for all persons covered by the policy. We may also disclose to service providers contracted by us to offer you services in chronic disease management or health management.

HBF may use your personal information for the purpose of providing you with material such as articles and information about other HBF products and services that may be of interest to you. However, you may request not to receive such information by contacting us and we will give effect to that request. Please allow five working days for your request to be actioned.

If you make a claim in relation to health insurance, HBF may need to collect sensitive information from third parties about the matter. When you make the claim you consent to HBF collecting related sensitive information directly from those third parties or, if the information relates to someone other than you covered by the insurance, you give consent on behalf of that person and you confirm that you have authority to do so. When you make a claim, you also give your consent to the relevant member of the HBF Group sharing your personal information (including sensitive information) with other members of the HBF Group for the purpose of preventing and detecting fraudulent or invalid claims or misrepresentation, which would cause loss to the HBF Group.

## **DOCUMENT STORAGE, SECURITY POLICIES AND PRACTICES**

We regard the security and integrity of your personal information as a priority, and will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. HBF maintains technology, processes and procedures no less than industry standard for the purposes of ensuring the quality and security of your personal information.

If you cease to hold any products issued by HBF, any personal information, which we hold, about you will be maintained for a period of 7 years (except in the case of health insurance, Lifetime Health Cover information and personal information for children which will be held at least until the person turns 25) in order to comply with legislative and professional requirements. After this time the information will be destroyed.

## **INFORMATION ABOUT THE USE OF OUR WEBSITE AND ELECTRONIC EXCHANGES**

You are not required to provide us with any personal information when visiting our website. However, sometimes we need to collect your information from our website to provide services that you request. For example, if you wish to fill out paperwork online or if you send us an online query.

When you visit our website, or download information from it, our Internet Service Provider makes a record of your visit and records the following information: your internet address, your domain name if applicable, the date and time of your visit to the website, the pages you accessed and documents downloaded, the previous website you have visited and the type of browser you are using. This information is only used for statistical and website development purposes.

We make limited use of cookies on our website. We only use cookies to improve the functionality of our website, not to store any of your personal information.

A cookie is a small message given to your web browser by our web server. The browser stores the message in a text file, and the message is then sent back to the server each time the browser requests a page from the server.

When cookies are used on our website, they are used to store information relating to your visit such as a unique identifier, or a value to indicate whether you have seen a web page. They are used to distinguish your Internet Browser from the thousands of other browsers. Our website will not store personal information such as an email address or other details in a cookie.

Most Internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to notify you each time a cookie is sent to your computer, giving you the choice whether to accept it or not.

We remind you that the Internet is not a secure environment and although all care is taken, we cannot guarantee the security of information you provide to us via electronic means.

## **ACCESS AND CORRECTION**

In most circumstances, you have a right to access the personal information, which we collect and hold about you, and to have it corrected if it is wrong. Please contact us if you wish to access or correct your personal information. We may deny your request in some circumstances and if we do this we will tell you why.

We will endeavour to respond to any request for access within 14-30 days, depending on the complexity of the request. If your request is urgent please indicate this clearly.

## **PRIVACY COMPLAINTS**

If you wish to complain about any breach or potential breach of this privacy policy or the NPPs, you should contact us and your complaint will be directed to the appropriate complaints manager.

Your complaint will be considered and responded to within 7 days. It is our intention to use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

## **CONTACT DETAILS**

HBF Privacy Officer  
GPO Box C101  
Perth WA 6809  
Phone: 133 423

## **CHANGES TO THIS POLICY**

HBF regularly reviews and updates its policies. This policy was last amended on **1st July 2011**.



## **ABOUT HBF PRODUCTS AND PRIVACY**

### **HEALTH INSURANCE AND PRIVACY**

HBF health insurance is provided to contributors and, in some cases, their dependants and family members. HBF may hold personal information about you if you hold (or have held) a health insurance policy, or if someone holds or has held one on your behalf.

In the context of providing health insurance, HBF may collect and hold information about your claims history, your Medicare number, your tax file number, and your medical history.

If you do not wish to provide personal information which is required, HBF may not be able to determine and pay benefits under your policy, assess or waive lifetime health cover loading, or assess and apply your eligibility for the federal government private health insurance tax rebate.

In the context of health insurance, HBF may use, and if necessary disclose, your personal information:

- to manage your claims (including auditing) and pay health insurance benefits;
- in connection with arrangements you make to pay your premium (for example with your employer or a financial institution); and
- to a hospital or medical practitioner when you are or have been a patient of that hospital or medical practitioner.

HBF has a range of obligations under the Private Health Insurance Act 2007 and related regulations that impact on its collection and disclosure of personal information. In effect, these require HBF to maintain records, report to regulatory authorities and to meet various requirements in relation to providing private health insurance. If you apply for private health insurance, HBF would be required to collect information such as your contact details and information that verifies that you are eligible for certain types of cover. HBF is also required to make certain information and records available to auditors, actuaries and public authorities including the Department of Health and Ageing, the Private Health Insurance Ombudsman and Medicare. We will disclose this and any other information as required by law.

### **GENERAL INSURANCE AND PRIVACY**

In the context of providing general insurance, on behalf of CGU, HBF may collect and hold information and details about your driving record, prior insurance claims, medical history, criminal history, and whether you have been refused insurance or had an application accepted on special terms.

We may not be able to meet your insurance needs if you do not provide us with personal information which we require.

There are requirements under the Insurance Contracts Act 1984 that you disclose to HBF all material information, and information which a reasonable person in the circumstances, would consider material. This may require you to provide personal information in relation to an insurance product you hold with HBF, which may have consequences in relation to any insurance policy you hold or claims under it.

HBF will use personal information you provide to decide whether to issue a general insurance policy, and if so, on what terms, and to assist CGU in managing any claim made by you.

If you hold a general insurance policy with HBF, HBF or CGU may disclose your personal information:

- when providing a certificate of currency to financial institutions (at your request or with your consent);
- to an external consultant dealing with the assessment or investigation of claims;
- in relation to travel insurance applications to medical assessors; and
- in relation to travel insurance, to a travel agent or overseas travel helpline (which may include the transmission of your personal information outside Australia).

If you take out travel insurance with us, you are taken to have given consent for your personal information to be transmitted overseas where this transmission directly relates to your travel insurance policy.

CGU are obliged by the Insurance Contracts Act 1984 to maintain certain transaction records and make those records available for inspection by the Australian Prudential Regulation Authority. We will disclose this and any other information as required by law.