

Private Health Insurance Privacy Collection Statement



We are HBF Health Limited ABN 11 126 884 786. At HBF, we exist to deliver for our members in the moments that matter. We achieve this by providing our members with products and services including private health insurance and health and wellness services. References to “HBF”, “HBF Health”, “we”, “us” or “our” in this policy refer to HBF Health Limited and its related bodies corporate other than those entities that conduct the HBF Dental, HBF Physio and Life Ready businesses. To view the privacy policies of these businesses, please visit their respective websites.

As an Australian business, HBF is required to comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) which includes the Australian Privacy Principles. We may also be subject to state and territory health records legislation when we deal with health information.

What is personal information?

“Personal information” is defined in the Privacy Act as information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, or is recorded in a material form or not. It includes, but is not limited to, your name, age, gender, address, contact details and sensitive information. Sensitive information includes, but is not limited to, health information, genetic information and some biometric information.

Collection and use of your personal information

HBF collects and uses your personal information to provide you with private health insurance and health and wellness related services, including to:

- verify your identity;
- assist you to ascertain if your existing cover is adequate for your current and foreseeable future needs and identify other opportunities or value you get from your membership;
- manage our ongoing relationship with you;
- process private health insurance premiums;
- pay private health insurance benefits;
- administer, process and audit private health insurance claims;
- assess your suitability for, enrol you in and administer patient surveys and health and wellness related services such as chronic disease management programs and health management programs;
- provide you with access to smartphone applications and website portals in relation to managing your health, your private health insurance membership and your relationship with us;
- conduct patient surveys, market research, marketing campaigns, targeted marketing and feedback campaigns to improve the health of members, the effectiveness of marketing activities, the member experience and the products and services HBF offers;
- contact you (via mail, email, phone or SMS) in relation to our community events, member initiatives and other products or services we think may be of interest to you, including the products or services of third parties during the period you have a relationship with HBF and after you cease purchasing any products or services from or through HBF, subject to relevant laws;
- manage, review and develop our private health insurance products and related services whether provided by us or other parties on our behalf;
- manage, review, develop and improve our business and operational processes, including training and systems, provided by us or other parties on our behalf;
- resolve any legal and/or commercial complaints or issues including compensation recovery;
- prevent, detect and follow up fraudulent or invalid claims or misrepresentations;

- ensure our records are consistent and accurate; and
- meet legislative requirements relating to private health insurers.

We may be required to collect personal information about you in order to comply with our obligations under the *Private Health Insurance Act 2007* (Cth) and other private health insurance laws and regulations.

We may collect your personal information from you, the person responsible for the management of your private health insurance membership (**Principal Policyholder**) or a person authorised to provide us this information on your behalf.

We may also collect your personal information from a third party such as a health service provider, broker or employer where doing so is necessary to provide you with private health insurance cover and pay you benefits. HBF also engages third parties to carry out functions on behalf of HBF (such as claims administration, patient surveys, membership management services, facilitators to organise and manage hospitals, doctors and health service providers, providers of claims advice and chronic disease management program providers) and they may collect your personal information from you and disclose it to HBF.

If you do not provide the personal information requested by HBF, we may be unable to provide you with private health insurance cover, pay you benefits, assess or waive lifetime health cover loading or apply an entitlement to the Australian Government rebate on private health insurance as a premium reduction.

Disclosure of your personal information

In order to carry out the activities described in this statement, HBF may disclose your personal information to persons or organisations such as:

- other companies in HBF Group;
- our brokers and agents who refer your business to us;
- our service providers (who may provide some services directly to you on our behalf) including mailhouses, market researchers and digital marketing partners, manufacturers of membership cards, claim administrators, claim auditors, claim advisers, our membership management service providers, the facilitators of our arrangements with health providers and IT support (including by way of cloud computing);
- other partners in connection with opportunities to improve your wellbeing and/or the value you get from your membership;
- our professional advisors;
- other health funds, service providers or other third parties who assist us in the detection and investigation of fraud;
- health and wellness service providers (such as hospitals, pharmacies, general practitioners, allied health providers, and chronic disease and health management program providers);
- the facilitators of our arrangements with doctors, health service providers and hospitals;
- payment system operators and financial institutions;
- service providers engaged by us or acting on our behalf to provide software or other IT services;
- persons authorised by you, including other persons covered by your private health insurance membership, and your agents and professional advisors such as legal practitioners;
- if you have a compensation claim, the insurer or statutory body responsible for paying your compensation claim or compensation recovery organisations;
- if you have an overseas visitors product, your educational institution, migration agent or broker;
- if you have a corporate private health insurance product, your employer (or their authorised representatives);

- regulatory bodies and government agencies (such as the Australian Taxation Office, Australian Government Department of Health and Aged Care, the Private Health Insurance Ombudsman and Medicare);
- potential or actual buyers of our assets or business; and
- other parties to whom we are authorised or required by law to disclose information.

If you are not the Principal Policyholder of your private health insurance membership, HBF may also disclose your Personal Information to the Principal Policyholder as part of administering the membership and paying benefits. This may include the disclosure of sensitive information about benefits claimed by you under your policy. If the Principal Policyholder has authorised their spouse/partner to administer the private health insurance membership, HBF may disclose the Principal Policyholder's Personal Information to their spouse/partner.

Disclosing your personal information overseas

HBF may disclose your personal information to overseas recipients in the circumstances set out in this document. At your request, HBF may provide a transfer certificate or claims history containing your personal information to an overseas insurer nominated by you.

Generally, HBF uses systems and customer teams located within Australia. However, HBF may also use service providers who store personal information overseas. This means personal information may be transferred as part of commercial arrangements between HBF and its service providers. Service providers located overseas may also be able to access your personal information which is stored in Australia. At the time of the publication of this statement, the countries which HBF discloses personal information to or from which personal information may be accessed includes the United States of America, the United Kingdom, Canada, India, Singapore, Germany, Ireland and the Philippines. A list of countries in which information may be located is available on our website at www.hbf.com.au/about-hbf/legal/privacy.

Marketing

HBF may use your personal information to contact you (including by phone call, SMS, direct mail, email and online advertising) in relation to other products or services we think may be of interest to you. This may include the products or services of other companies in HBF Group or the products or services of third parties. Personal information may be shared between companies in HBF Group who may use your personal information to contact you (including by phone, SMS, direct mail, email and online advertising) in relation to their products or services or the products or services of third parties.

In particular, HBF may contact you about:

- getting value from your HBF membership, including timely advice to help you get the most value from our products and partners;
- community and events, including invites to local events and updates on what's happening in your community;
- health and wellbeing, including lifestyle tips relevant to you;
- seeking your ideas and input, including to request that you share your thoughts and opinions by inviting you to complete patient surveys or taking part in research to help inform HBF product and service improvements, design development, marketing and more; and
- service feedback, including asking you to provide feedback on your experience with HBF's customer service.

You may select the types of messages you receive, and the ways you receive them, or opt-out of receiving these messages completely by changing your communication preferences in your Member Portal at any time. You can also use the opt-out functionality in any message we send you to opt out of that type of message in the future. You may also choose to share your views on a range of issues related to HBF by opting into receiving HBF Opinion Panel communications in your Member Portal.

HBF or other companies in HBF Group may contact you about products and services we think may be of interest to you during the period you are a private health insurance member and after you cease your private health insurance membership. For example, if you cease your private health insurance cover with us, HBF may contact you about its private health insurance offering under other brands. HBF may also use your personal information (in conjunction with social media platforms and other digital content operators) to market HBF digital content to you online.

Use of your personal information in general digital marketing campaigns (such as surveys, website analytics, online behavioural advertising) may depend upon the privacy settings selected within applications and devices you use to access websites and other online content.

You may opt-out of receiving some or all direct marketing information (including direct digital marketing) from HBF at any time by:

- calling us on 133 423
- emailing us on hello@hbf.com.au
- changing your preference at myHBF.com.au
- selecting the option to unsubscribe on a form when you apply for a product or service. Please allow five working days for your request to be actioned.

Service Related Communications

Where you provide us with an email address or use our member web portal myHBF, we send most service-related communications to you by email or by the member portal. Service-related communications are the essential things you need to know about your cover, like changes to premiums and policy details. You can manage how we communicate with you by contacting us as detailed in the previous section.

If you are the Principal Policyholder

As the Principal Policyholder, you must ensure that your spouse/partner and dependant children (if any) are aware of, and consent to, how their personal information is handled under this privacy statement and the HBF Privacy Policy which can be accessed at www.hbf.com.au/about-hbf/legal/privacy-policy (**Privacy Policy**). You and your spouse/partner and dependant children (if any) should not provide us with any personal information unless you and they consent to it being handled in accordance with this Collection Statement and the Privacy Policy.

By:

- taking out or maintaining your private health insurance policy; or
- providing your personal information to HBF, or you or your spouse/partner and/or dependant children (if any) providing their personal information to HBF, for whatever purpose.

You consent to, and warrant that your spouse/partner and/or dependant children have consented to, HBF collecting, using and disclosing your and their personal information, however collected by us, in accordance with this Collection Statement and the Privacy Policy.

Access to your information and contacting us

HBF will allow you to access and correct personal information we hold about you as required by law. If you have any queries about how HBF handles your personal information, or would like to request access to or correction of that information, please contact us:

- By mail – HBF Privacy Officer, GPO Box C101, Perth WA 6839; or
- By telephone – 133 423.

If you have any concerns or complaints about the manner in which your personal information has been collected or handled by HBF, please contact the Privacy Officer using the details above.

The HBF Privacy Policy (available at hbf.com.au/privacy) contains further information about how HBF generally handles your personal information including:

- how you can access and correct personal information we hold about you; and
- how you can submit a privacy complaint to HBF and how HBF will deal with your complaint.