



HBF Group Policy
Controlled Document

Group Privacy Policy

HBF Health Limited Privacy Policy

We are **HBF Health Limited ABN 11 126 884 786**. We own and operate a number of different businesses that provide products and services, including private health insurance (under the brand HBF Health), health and wellness services and financial services (including general insurance and life products). References to HBF, 'us', 'we' or 'our' include HBF, HBF Health, HBF Home and Car Insurance, HBF Life, and other business names, and where the context requires, other related bodies corporate (collectively **HBF**).

What does this privacy policy do?

This HBF privacy policy explains how we manage the personal information that we collect in a variety of circumstances and how we hold, use and disclose this personal information. It advises how to contact us if you have any queries about the management of your personal information, how you can access and change your personal information and who to contact if you would like to complain or provide feedback.

The relationship you have with HBF will determine how we collect, hold, use and disclose your personal information, for example whether you are a health insurance member of HBF or whether your relationship with us is because you are a participant in one of our community events.

Privacy Collection Statements

To obtain a more specific and detailed list on how we collect, hold, use and disclose your personal information, please visit the privacy link at our website at www.hbf.com.au to obtain the privacy statement/s which is or are relevant to your relationship with HBF.

Protecting your privacy

HBF processes personal details on a daily basis. Maintaining the security and confidentiality of your personal information is important to us. HBF is committed to compliance with the *Privacy Act 1988* (Cth) (**Privacy Act**), which regulates the collection, use, storage, disclosure

and destruction or de-identification of personal and sensitive information.

What is personal information?

Personal information is information or an opinion about an 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 your name, age, gender and contact details.

What is sensitive information?

Sensitive information is a subset of personal information. It is information or an opinion about certain aspects of an individual, such as health information. In this privacy policy, a reference to personal information includes sensitive information.

Who does our privacy policy apply to?

Our privacy policy applies to the following individuals:

- current members of HBF;
- prospective members of HBF (for example, those to whom we provide quotes);
- participants in the community events we hold, such as HBF Run for a Reason and HBF Fitness;
- participants in health and wellness services and programs (such as flu vaccinations, health checks), our yoga and massage services;
- prospective employees; and
- other individuals whose personal information is collected by us during the conduct of our business, including authorised representatives, our service providers, contractors and franchisees.

How do we collect your personal information?

HBF will only collect personal information about you by lawful and fair means and not in an unreasonably intrusive manner.

HBF may collect your personal information:

- from you when you complete an application form, face-to-face, over the telephone, through an online form or portal, or by email;

- from another person on your policy or a person authorised by you to provide us with information;
- from third parties such as a related body corporate of HBF, our general insurer and life risk insurance partners, our pharmacy franchisees and your former insurer;
- from health service providers and hospitals; and
- from organisations engaged by HBF to carry out functions on behalf of HBF such as:
 - health and wellness services and programs and chronic disease management programs (together referred to as **Health Programs**);
 - participant registration providers for community events held by HBF;
 - claims administration and membership management service providers; and
 - healthcare provider directories and customer review facilitators.

Where HBF collects your personal information from third parties, it may use that information for a number of reasons including to process your private health insurance claims, pay you benefits, assess your suitability for our Health Programs, assist our partners to provide you with general insurance and life risk products, determine past general insurance claims and to investigate potential fraudulent claims and misrepresentations.

What happens if you don't provide us with your personal information?

If you do not provide the personal information requested, we may not be able to provide you with, or facilitate the provision of, the products and services you request, or pay your claims, waive life time health cover loading or apply your Australian Government rebate on private health insurance where you are eligible to receive this.

You have the right not to identify yourself when dealing with us where it is lawful and practicable for us to allow it. However, on many occasions there may be practical limitations which impact our ability to facilitate this. For example, we will need your name and residential address in order to provide you with private health insurance coverage.

What kind of personal information do we collect and hold?

The type of personal information we collect about you depends on your relationship with us, whether you are a member of HBF or only utilise some of our services, such as our community events.

Personal information we commonly collect and hold includes:

- contact information (such as name, address, email address and phone numbers);
- your date of birth and gender;
- records of our interaction with you, such as voice recordings of telephone conversations and system notes;
- employment details for corporate members ;
- Commonwealth identifiers (such as your Medicare number);
- financial information (such as bank account, credit card details and income tier information for rebate purposes); and
- historical information (such as your prior insurance claims).

We may also collect and hold specific sensitive information, such as:

- your health claim details;
- health information in connection with your participation in our Health Programs and health checks; and
- participation in our fitness related events, along with any medical issues declared by you.

How does HBF use your personal information?

How we use the personal information we collect about you depends on your relationship with us; for instance whether you are a health member or only participate in our community events. In general when we collect your personal information we may use this to:

- manage our ongoing relationship with you;
- administer, process and audit private health insurance premiums and claims and pay benefits if you have an insurance product with HBF;
- provide you with our products and services;
- assist our life risk and general insurance partners to decide whether to issue a policy, and if so, on what terms, if you have applied for a policy;

- assist our general and life risk insurance partners in managing any claims made by you on your policy;
- perform functions and activities relating to our businesses, such as management and development of our insurance and health services and improvement of our business and operational processes and systems;
- work with third parties to improve our membership offering and value;
- conduct market research, research activities, marketing campaigns 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;
- manage and resolve any legal or commercial complaints or issues; and
- comply with our legal obligations.

We may also use your personal information in additional ways depending on your relationship with us

If you are a health member of HBF, we may also use your personal information to assess your suitability for and contact you about insurance and health services that we believe may be of benefit to you including Health Programs, whether run by HBF or offered by a third party.

Where HBF has identified that you could benefit from participation in a Health Program, your personal information may be given to a provider of a Health Program contracted by HBF, who will contact you to assess your suitability for the Health Program and to provide you with details of the programs available to you.

If you participate in a Health Program the provider may disclose your personal information to third parties such as the Health Program's agents, service providers and professional advisors, or to health service providers, persons authorised by or responsible for you and to other parties to whom the Health Program provider is authorised or required by law to disclose personal information, including government agencies, and these parties may collect that personal information.

The provider will also disclose your personal information, including your health information to HBF in order for us to pay benefits for your participation in the Health Program and in order to allow us to:

- review, develop and improve the services;
- assess the outcomes of the services;
- obtain an integrated view of our members; and
- contact you (via mail, email, phone or SMS) in relation to our other Health Programs.

//

If you are a participant in one of our community events we also use your personal information to manage your participation in the event, inform you of any changes to the event and keep you informed of our other health, wellbeing, fitness initiatives and community events held by HBF or our partners.

//

If you receive a health service from our pharmacy franchisee, we may use your personal information to prepare reports on service participation and outcomes and analyse health trends.

//

If:

- you are authorised to act for or on behalf of, or responsible for, a member of HBF; or
- we contract you to provide us with goods or services, and

we are provided with personal information, we will only use this personal information for the purpose for which it was given and for any related purpose.

//

Where you are a prospective employee of HBF we only use your personal information to consider you for the role for which you have applied and if unsuccessful, we retain your personal information for consideration for future roles. This personal information will be destroyed or de-identified if the original reason for collection has ended or a candidate communicates that they do not require further consideration for employment by HBF.

To whom will we disclose your personal information?

In order to carry out the purposes relevant to your relationship with HBF, we may disclose your personal information to persons or organisations such as:

- individuals covered by your policy as part of administering the policy and paying benefits;
- your agents and advisors or other persons authorised by, or responsible for, you;
- your employer to confirm your membership status (or their authorised representatives) if you have a corporate insurance product;
- payment system operators and financial institutions;
- our claims administrators and claims advisers;
- our general insurer and financial services partners;
- health service providers;
- the facilitators of our arrangements with doctors, health service provider's and hospitals, such as the Australian Health Service Alliance (**AHSA**);
- the facilitators of health care provider directories and customer review services to which you may subscribe, such as Whitecoat;
- service providers engaged by us or acting on our behalf to deliver services relevant to your relationship to HBF;
- related bodies corporate of HBF and these related bodies corporate may use this information to contact you (including via mail, email, phone or SMS) in relation to their products or services or the products or services of third parties;
- third parties with whom HBF partners or works with to improve its membership offering and value;
- our professional advisors;
- other health funds, service providers or other third parties who assist us in the detection and investigation of fraud;
- regulatory bodies and government agencies; and
- other parties to whom we are authorised or required by law to disclose information.

Consent to the collection, use and disclosure of your personal information

Where you provide us with personal information about your partner or a dependent on your policy, you must obtain that person's permission to give us the information and inform them that you have given the information to us.

As a HBF member you confirm that you and other members covered under the policy or other individuals whose information you or they provide consent to us collecting, using and disclosing your and their personal (including sensitive) information, however collected by us, in accordance with our privacy policy.

Where you are a health member of HBF, you also agree that HBF's strategic partner, AHSA may collect your personal information, including your health information ("**your information**") and use your information and/or disclose it to HBF or your health service provider for the purposes of providing health services to you and for managing the funding of those services, or as required by law.

Can I withdraw consent to the use of my personal information?

You may withdraw your consent:

- to the use of personal information for secondary purposes;
 - to the sharing of your sensitive information between HBF and providers of its Health Programs or to being contacted in relation to any of our Health Programs,
- for yourself or any dependent, by contacting us on 133 423 or visiting a HBF branch.

You may also opt-out of receiving marketing information from HBF and its related bodies corporate at any time (please allow five working days for your request to be actioned) by:

- calling us on 133 423;
- emailing hello@hbf.com.au; or
- 'ticking the box' on the relevant form when you apply for a product or service.

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 this web portal. Service-related communications are not

marketing communications but the essential things you need to know about your cover, like annual tax statements and changes to premiums and policy details. You will still receive service related communications from us even if you have requested not to receive marketing communications. You can manage how we communicate with you by contacting us as detailed in the previous section.

Do we transfer personal information overseas?

HBF may transfer your personal information overseas in the circumstances outlined below.

If you take out travel insurance, you consent to HBF transferring your personal information overseas, where this transmission directly relates to your travel insurance policy, including to an overseas travel agent, overseas travel helpline or overseas health service provider in the country you are travelling to, or are travelling in.

If you take out private health insurance, at your request, HBF may provide a transfer certificate or claims history containing your personal information to an overseas insurer nominated by you. By making such a request, you give consent for your personal information to be transmitted overseas in these circumstances.

HBF sometimes use service providers who either host or store personal information overseas. This means HBF may transfer personal information about you between countries to those service providers for the purposes outlined in this policy.

In the event HBF discloses your personal information outside Australia, we will comply with the requirements of the Privacy Act that relate to transborder data flows.

Online data collection and use

If you access any HBF website, we collect information about user activities on the website. This includes information such as the type of browser used to access the website and the pages visited.

We use this information to understand how our web site is assisting members and plan future improvements to our websites and related online services and apps.

For more information, please refer to the [HBF website terms of use](#).

Cookies

We use cookies and industry standard analytics packages to collect usage data to help us determine which of our web pages are the most popular for our members and when they are viewed. When you visit our websites we may set a cookie on your machine so that when you next visit our websites we can understand the usage of our website over time.

A “cookie” is a small text file placed on your computer by a web server when you access a website. Cookies are frequently used on websites. Cookies in themselves do not identify the individual user, just the computer used.

You can choose if and how a cookie will be accepted by configuring your preferences and options in your browser. For more information please refer to documentation for your chosen browser and/or device.

MYHBF

When you use myHBF services, we keep a record of your log in along with a record of your transaction and user account history.

When you register for and use myHBF, you accept and are bound by the myHBF terms of service. For information about your use of myHBF, including the privacy and security of your myHBF account, please refer to the terms of use of myHBF.

How do we hold your personal information and manage the data quality and security of your personal information?

HBF takes all reasonable steps to make sure that the personal information that we collect, hold, use and disclose is accurate, complete and up to date. We will protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure. Where permitted by law we will destroy or permanently de-identify personal information that is no longer needed.

Can you access your personal information?

HBF will generally provide you with access to your personal information if practicable, and will take reasonable steps to amend any personal information about you which is inaccurate or out of date. In

some circumstances and in accordance with the Privacy Act, HBF may not be able to give you access to your personal information, or may refuse to correct your personal information, such as:

- when we no longer hold or use the information;
- providing access would have an unreasonable impact on the privacy of others;
- the request is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings and would not normally be disclosed as part of those proceedings;
- providing access would be unlawful;
- denying access is required by law;
- providing access would be likely to prejudice the prevention, detection, investigation and prosecution of possible unlawful activity;
- the information would reveal our commercially sensitive decision-making process; and
- where access would pose a threat to the life or health of any individual.

If we cannot give you access to your information we will provide you reasons for this decision.

Can you correct your personal information?

We will take reasonable steps to ensure your personal information is accurate, complete and up-to-date at the time of collecting, using or disclosing it.

Please notify us if your details change to ensure that the information we hold about you is accurate. We will respond to requests to update details within a reasonable period.

Our contact details

Please contact us if you would like to seek access to or correct the personal information we hold about you:

- By mail: HBF Privacy Officer, GPO Box C101, Perth WA 6839;
or
- By telephone: 1300 883 530

How we handle complaints

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 whose contact details appear above. Your concern or complaint will be directed to the appropriate complaint manager who will consider and respond to your complaint within seven 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 may contact the Office of the Australian Information Commissioner who may investigate your complaint further.

Further information

Further information about the application of the Privacy Act can be found at the website of the Office of the Australian Information Commissioner at www.privacy.gov.au.

The privacy policy of AHSA provides its contact details and explains how you may access and correct your information or make a complaint. This document is available at, www.ahsa.com.au/web/ahsa/privacy_policy.

Changes to our Privacy Policy

This Privacy Policy is effective from 20 July 2017. As this Privacy Policy is updated from time to time, to obtain a copy of the latest version at any time, you should visit the privacy link at our website at www.hbf.com.au

Policy Maintenance Data Table

Policy Title:	Group Privacy Policy			
Policy #	Grp 143	Access	All	
Division:		Originated:	08 Feb 2008	
Policy Owner:	Manager Engagement	Member	Revised:	20 July 2017

Policy Approver:	Risk Management & Compliance Committee (RMCC)	Next Review Date:	20 July 2018
Related Policies			
Related Procedures			