
INFORMATION HANDLING POLICY

www.bupa.com.au



1. Introduction

1.1 Who we are

In this document, 'we', 'us', 'our' and 'Bupa' refers to Bupa Australia Pty Ltd (ABN 81 000 057 590) and its related entities and bodies corporate

1.2 Protecting your privacy

Your privacy and maintaining the confidentiality of your personal information is important to Bupa. This document sets out how we handle your personal information, including the collection, storage, use and disclosure of your personal information, as well as how you can access and change your information, provide us with feedback or make a complaint.

This document, as amended from time to time, forms part of Bupa's Fund Rules (available on our website or by contacting us).

Bupa is bound by the National Privacy Principles set out in the Privacy Act 1988 (Cth) ("**Privacy Act**") and any other applicable privacy legislation, including (but not limited to) the Health Records Act 2001 (Vic), Health Records and Information Privacy Act 2002 (NSW), Health Records (Privacy and Access) Act 1997 (ACT).

1.3 Definitions

Consent means your permission. Your consent can be express or implied. Express consent can be written (e.g. when you sign a form or send us correspondence) or verbal (e.g. when you give us your permission over the phone or in face-to-face conversations). Your consent will be implied when we can reasonably form a conclusion that you have given consent by either taking action or deciding not to take action. For example, if you have received direct marketing from us in the past, we have your implied consent to send you further direct marketing, until you tell us otherwise.

Customer means a person who is currently receiving, or has previously received products or services from us and includes a policy holder or individual covered by a health insurance policy provided by us.

Health management program means a program intended to either reduce the complications in a person with a diagnosed chronic disease, or prevent or delay the onset of chronic disease for a person with identified multiple risk factors for chronic disease, as defined in the Private Health Insurance (Health Insurance Business) Rules 2009 (Cth).

Partner means a person of either sex with whom a policyholder lives in a bona fide domestic relationship and includes a person to whom the policyholder is legally married.

Personal information has the same meaning that it has under the Privacy Act, namely information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Policy holder means the holder of a policy referable to us.

Sensitive information is a sub-set of personal information and includes health information and otherwise has the same meaning that it has under the Privacy Act.

2. Collection of your personal information

2.1 What kinds of personal information does Bupa Australia collect?

The amount and type of personal information we collect from you and hold about you will vary depending on whether you are an existing customer, have made enquiries about our products and services and also the extent to which you have used our products and services.

If you apply to be, are currently or have in the past been our customer, the personal information that we hold about you may include:

- your name, address, telephone and email contact details;
- your gender, date of birth and marital status;
- your billing details;
- records of our interactions with you such as system notes and voice recordings of telephone conversations you have had with our employees;
- census and statistical information for purposes including product development and risk assessment;
- details of claims you have made and treatment you have received, including date, amount paid, etc.

If you have, or have previously had, private health insurance with us we may hold information about:

- your current and previous products;
- changes of cover, cancellations and suspensions of your policy;
- your Medicare number;
- details of when you have registered for the Federal Government Rebate on private health insurance;
- details of when you have registered for health management programs and your participation in the program;
- employer details (for corporate health plan customers or if you pay premiums through payroll deduction);
- health information; and
- details of claims you have made including the service type, the provider, date of service and benefits paid.

In general we do not hold information about persons who are not customers. However, if you have previously contacted us to make an enquiry about our products and services and/or obtained a quote we may hold the information you gave us at that time.

In addition, where a customer provides us with information about another person, or where another person is designated to act on behalf of a customer, we may hold that person's information.

2.2 Does Bupa Australia collect sensitive information?

For some of our products and services, we may be required to collect and hold your sensitive information. For example, if you have health insurance with us, we will collect and hold information about your health claims for the purposes of assessing claims and administering your policy. In addition, we may request information about your health claims from health service providers for audit purposes and to ensure benefits have been provided in accordance with our Fund Rules, policies and with the law.

2.3 How does Bupa Australia collect personal information?

We may collect personal information from you in a range of ways, including:

- when you complete an application form or another type of form in relation to our products and services;
- when you contact us in person, by phone, via mail, email or online;
- when you lodge a claim;
- when you participate in a health management program.

We will always try to collect your personal information directly from you. However, there may be instances where we will need to collect your information from other persons or entities.

For example, for health insurance customers we may collect your personal information in the following circumstances:

- if you are covered by a family or couples health insurance policy, we may collect information from another person on the policy;
- when you go to hospital, we will collect information about your admission and treatment directly from the hospital;
- when you go to a health services provider, we will collect information about your treatment from that provider;
- if you are a corporate customer or pay your premiums by payroll deduction, we may collect information from your employer or insurance broker, as the case may be;
- if you have transferred to Bupa from another private health insurer, we may collect information from that private health insurer.

If you have provided us with information about another person, then you need to tell that other person that you have done so, that they have a right to access their information and that they can refer to this document for information on how Bupa will handle their personal information.

2.4 Couples and family health insurance policies

Some of our health insurance products can cover more than one person. For example, Family and Couples policies cover two or more persons. Information about dependants (partner and children) on health insurance policies is collected from the policy holder or with the policy holder's authorisation. For example, the policy holder may give us details of all persons covered on a policy when completing an application.

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

If a policy holder on a policy lodges a claim on your behalf, we assume they have your consent to give us all the information required to process your claim.

2.5 If you do not provide us with your personal information

If you do not provide us with the personal information we reasonably request, we may be unable to provide you with the products or services that you are requesting.

3. Use and disclosure of your personal information

3.1 How does Bupa Australia use your personal information?

We use your personal information to provide, manage and administer our products and services to you and to operate an efficient and sustainable business. As part of these processes, we may disclose your personal information on a confidential basis to our related entities within the Bupa Australia Group of companies.

In addition, we may use your information to:

- process your application;
- administer your policy;
- investigate and assess any claims;
- process payments;
- contact you in relation to any matter relating to you or the products and services provided to you;
- identify whether you are a suitable candidate for participation in a health management program;
- contact you to advise you of health management programs and other programs and services that may help you improve your health and wellbeing;

- conduct health management programs;
- answer your enquiries and deliver customer service to you;
- conduct quality assurance activities;
- carry out internal functions, including administration, training, accounting and information technology;
- practice effective risk management and prevent fraud, for example through claims auditing;
- monitor, price and evaluate products and services;
- resolve complaints;
- conduct customer surveys;
- conduct marketing, research and analysis;
- comply with laws and regulations.

3.2 Direct marketing

From time to time, we may contact you to provide you with information about other products and services offered by us, our related entities and our business partners that may be of benefit to you and your family. This includes information about health management programs or services that can help you improve your health. When we contact you it may be via mail, phone, email or SMS.

We may share your personal information on a confidential basis with our related entities and bodies corporate so that they can offer you products and services.

When you become our customer, you consent to us using your personal information for direct marketing purposes (for an indefinite period), unless you have contacted us to withdraw your consent.

If you do not wish to receive marketing material from us you can contact us at any time to let us know. Our contact details are at the end of this policy.

If you request not to receive marketing material, please note that we will still contact you in relation to our on-going relationship with you. For example, we will still send you any bills, statements and notices that are relevant to the products and services you hold with us.

When you become our customer, you consent to us using your personal information for direct marketing purposes (for an indefinite period), unless you have contacted us to withdraw your consent.

If you do not wish to receive marketing material from us you can contact us at any time to let us know. Our contact details are at the end of this policy.

If you request not to receive marketing material, please note that we will still contact you in relation to our on-going relationship with you. For example, we will still send you any bills, statements and notices that are relevant to the products and services you hold with us.

3.3 Health management programs and services

We are committed to delivering our customers with a range of programs designed to assist health and wellbeing.

We may use the personal information (including health information) collected about customers to design, implement and offer a range of health management programs and services that may benefit customers and to identify suitable candidates for health management programs.

Some programs and services will be made generally available to all customers through our website, brochures, newsletters and other communication initiatives.

In other instances, a program or service may be targeted to specific customers who are most likely to benefit from the program. For example, from time to time we may implement a program suitable for customers with, or at risk of, a specific illness or medical condition.

From time to time, you may be contacted by us, or by those acting on our behalf, to offer you a specific health management program.

For all health management programs and services made available to customers, participation is voluntary and customers can opt out at any time.

3.4 Who does Bupa Australia disclose your personal information to?

Bupa Australia operates across Australia. In the course of conducting our business and providing our products and services to you, we may disclose your information to our related entities and bodies corporate.

In addition, in order to allow us to provide, manage and administer our products and services to you and to operate an efficient and sustainable business, we may be required to disclose your information to third parties. This may include disclosure in the following circumstances:

- any persons or entities engaged by us or acting on our behalf in relation to our business, such as service providers;
- for health insurance, we may disclose your information to hospitals, medical and ancillary service providers to facilitate the provision of cover to you;
- government and regulatory bodies, including, Medicare, the Australian Taxation Office, the Department of Health and Ageing, the Private Health Insurance Ombudsman, the Private Health Insurance Administration Council;
- if you or any person on your policy is transferring to or from another private health insurer, we may disclose your information to the other insurer to facilitate your transfer;
- any persons acting on your behalf including those persons nominated by you, executors, trustees and legal representatives;
- lawyers, auditors and other advisors appointed by us or acting on our behalf;
- where we need to disclose information to enforce our legal rights, including when we are seeking to recover amounts paid by us;
- where disclosure is required by law, including compulsory notices from courts of law, tribunals or government agencies.

3.5 Use and disclosure of personal information on Couples and Family health insurance policies

Some of our health insurance products cover more than one person. For example, Family and Couples policies cover two or more persons. If you are covered by a family or couples health insurance policy, you need to be aware who else on the policy can access your personal information.

For our health insurance products, where there is a Family or Couples policy, each person on the membership aged 17 and over may complete a *'Keeping Your Personal Information Confidential'* form indicating their preferences regarding who should receive information about their health claims. When an individual on a policy turns 17, we will automatically mail any claims information directly to the individual to whom it relates, unless they nominate otherwise. All cheques, non cash payments and general policy correspondence will be sent to the policy holder.

The policy holder is the person responsible for the administration and maintenance of the policy and is able to:

- Change any details on a policy;
- Change level of cover;
- Add and remove persons from the policy;
- Receive benefits on behalf of other persons on the policy;
- Terminate the policy.

The policy holder may permit their partner, or another person aged 18 years or over, to be treated as authorised to operate the policy. When the policy holder gives such an authority, the authorised person will have the same level of access to the policy as the policy holder. However (with the exception of Overseas Visitors Cover products) the authorised person will not be permitted to:

- Terminate the policy;
- Remove the policy holder from the policy.

This authority may be given by completing an 'Authority Form' or by any other means approved by us. The authority will remain in effect until the policy holder contacts us to revoke it.

If you are insured under a Couples or Family policy and you and your partner become divorced or separated, you will no longer be eligible to remain insured under a Couples or Family policy together.

3.6 Travel, home and car insurance customers

Bupa Australia Pty Ltd and Bupa Australia Health Pty Ltd (together "**Bupa**") are authorised representatives of CGU Insurance Limited (**CGU**) ABN 27 004 478 371 AFSL 238291 and Mutual Community General Insurance Pty Ltd (**MCGI**) ABN 59 007 895 543, AFSL 237634.

If you apply for and purchase travel, home or car insurance from Bupa, the insurance is issued by CGU or MCGI and we will disclose your personal information to CGU or MCGI for the purposes of allowing CGU and MCGI to:

- consider your insurance application and subsequent application for insurance;
- underwrite and price any policy issued by each of CGU or MCGI or their related entities;
- calculate and offer discounts;
- issue you with a policy;
- administer the policy;
- investigate, assess, manage and pay any claim made by or against you.

When you take out travel, home or car insurance you should refer to the Financial Services Guide and Product Disclosure Statement provided to you for more information on how CGU and MCGI handle your personal information.

3.7 How does Bupa store personal information and for how long?

We will take all reasonable steps to ensure that your personal information is stored securely and is protected from misuse and loss and from unauthorised access, modification or disclosure. This includes a range of systems and communication security measures, as well as the secure storage of hard copy documents. In addition, access to your personal information will be restricted to those properly authorised to have access. We keep your personal information for as long as it is required to provide you with the products and services you requested from us and to comply with legal requirements.

If we no longer require your personal information for any purpose, including legal purposes, we will take reasonable steps to securely destroy or de-identify your personal information.

4. Accessing and Correcting your Personal Information

4.1 Can I access my personal information?

You can ask us for access to the information that we hold about you at any time. Simply contact us (our contact details are listed below) to make your request. We will always endeavour to meet your request for access. However in some

circumstances, we may be unable to give you access to certain information, such as where:

- 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 are unable to give you access to the information you have requested, we will give you reasons for this decision when we respond to your request.

We may charge you a reasonable fee for access to some types of information. This charge will be limited to the cost of recouping our costs for providing you with the information. For example, document retrieval, photocopy, labour and delivery to you. We will not charge you to make a request to access your information.

4.2 Correcting your personal information

To enable us to provide you with the best possible service, it is important that the information we hold about you is accurate. We will take reasonable steps to ensure that your personal information is accurate, complete and up-to-date at the time of collecting, using or disclosing it. However, it is your responsibility to notify us when your details change.

If you believe any information we hold about you is inaccurate, incomplete or out-of-date, you should contact us and we will amend your records. If we disagree with the changes you request to your personal information, we will give you a reason and put a note on your record indicating that you disagree.

5. Your Privacy Online

5.1 Online data collection and use

The information handling processes outlined in this document also relate to any personal information collected online via any Bupa website. When an individual accesses any Bupa website, anonymous technical information may be collected about user activities on the website. This may include information such as the type of browser used to access the website and the pages visited.

This information is used by Bupa to make decisions about maintaining and improving our websites and online services. This information remains anonymous and is not linked in any way to personal identification details.

For more information, please refer to the website security information on www.bupa.com.au.

5.2 Cookies

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. We use cookies to collect data to help us determine which pages are most popular, peak usage times and other information that helps us make our websites easier and more efficient for you to use. When you visit our websites we may set a cookie on your machine so that when you next visit our websites it links to your personal information that is stored on our system.

You can choose if and how a cookie will be accepted by configuring your preferences and options in your browser. For example, you can set your browser to notify you when you receive a cookie or to reject cookies. However, if you decide not to display cookies, then you may not be able to gain access to all the content and facilities of this website.

6. Resolving your Concerns

You can contact us at any time if you have any questions or concerns about this document or about how your personal information has been handled.

You can contact our Privacy Officer by directing your correspondence to:

Privacy Officer
Bupa
600 Glenferrie Road
HAWTHORN VIC 3122

Once you have contacted us in relation to your concerns, if you are not happy with Bupa's response, or if you do not feel your complaint has been resolved, you are able to seek advice from the Office of the Australian Information Commissioner by calling 1300 363 992.

7. How to contact us

This section outlines how you can contact us.

Mailing details:

Bupa
600 Glenferrie Road
HAWTHORN VIC 3122

Call us on 134 135.

www.bupa.com.au