



Information Handling Policy

July 2018

1. Introduction

1.1 About Bupa

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.

The companies within the Bupa Australia Group offer a range of services including:

- corporate health services offered through Bupa Wellness Pty Limited (bupawellness.com.au);
- optometry services through Blink Optical (Bupa) Pty Limited (trading as Bupa Optical) (bupaoptical.com.au);
- health coaching services through Bupa Health Dialog Pty Limited (bupahealthdialog.com.au);
- dental services through Dental Corporation (dentalcorp.com.au);
- medical visa services through Bupa Medical Visa Services (bupamvs.com.au); and
- GP services through Bupa Medical (bupa.com.au/medical/gp).

If you have received products or services from other companies within the Bupa Australia Group, you should refer to the privacy policies of that company, available on their website.

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, and 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). When you become a Bupa customer (for example, by taking out health cover with us) you agree to the handling of your personal information as set out in this document.

In addition to this policy, Bupa complies with various privacy legislation, including:

- the Privacy Act 1988 (Cth) ("**Privacy Act**") (including the Australian Privacy Principles under that Act)
- health records legislation, including the *Health Records Act 2001* (Vic), *Health Records and Information Privacy Act 2002* (NSW), *Health Records (Privacy and Access) Act 1997* (ACT); and
- marketing legislation, including the *Spam Act 2003* (Cth) and the *Do Not Call Register Act 2006* (Cth).

1.3 Definitions

In this policy, the following terms have the following meanings:

Consent	means your permission. Your consent can be express or implied. Express consent can be written (e.g. when you sign a form or agree to something by completing a transaction via myBupa) 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.
-----------------	--

Fund Rules	means the Fund Rules of Bupa Australia Pty Limited, which you agree to upon taking out a health insurance policy with us. You can view our Fund Rules at bupa.com.au .
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 <i>Private Health Insurance (Health Insurance Business) Rules 2009 (Cth)</i> .
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 identified or reasonably identifiable individual.
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 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 under your policy and treatment you have received, including date, amount paid, service type, description of the service, which healthcare provider treated you, etc.

If you have, or have previously had, private health insurance with us we may also 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 Australian Government Rebate on private health insurance and your income tier for rebate purposes;
- details of when you have participated in for health management programs program or other health related services provided by us; and
- employer details (for corporate health plan customers or if you pay premiums through payroll deduction).

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 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 the purposes of verifying any claims, 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 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 (or when we contact you through any means);
- when you make a claim;
- when you log in for and use services offered through myBupa;
- 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 (for example, the person setting up the policy under which you are insured);
- when you go to hospital, we will collect information about your admission and treatment directly from the hospital;
- when you go to a healthcare provider to receive treatment, 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;
- for some overseas visitors products, we may collect information from a migration or other agent;
- for overseas student products, we may collect information from your educational institution;
- 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, including family, couples and single parent policies. Information about dependants (partner and children) on health insurance policies is collected from the policy holder who sets up the policy, or with that person's authorisation. For example, a person who contacts us to set up a policy may give us details of all persons they wish to cover on their policy.

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 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 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 operating our business, we may use your information to:

- process your application;
- administer your policy;
- investigate, assess and pay 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;
- conduct research and evaluation of our health and wellness programs (if we use your identified personal information to do these things, we will always ask for your consent);
- carry out internal functions, including administration, training, accounting, audit and information technology;
- practice effective risk management and prevent fraud by conducting claims audits and analysis of claims;
- monitor, price and evaluate products and services;
- resolve complaints;
- conduct customer surveys;
- conduct market research and analysis;
- comply with laws and regulations;
- fulfill marketing promotions.

3.2 Direct marketing and membership communications

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

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.

Any membership communications will be addressed to the policy holder in whose name your policy is registered (for example, notices about changes to your cover). Some communications may be personal communications, meaning they are addressed to another individual on the policy. This may include communications about a person's claims (see section 3.5 for more information).

From time to time, we may offer new options for how you can receive membership and personal communications and may contact you to ask you about your communication preferences (for example, via post, on myBupa or via email).

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. Such programs and services may be offered by Bupa, or by a party engaged by us or acting on our behalf to provide the programs or services.

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.

If you take part in a health coaching program offered by Bupa, please refer to section 5 (below).

3.4 Who does Bupa disclose your personal information to?

Bupa 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, and your information may be handled by us in any State or Territory where we operate.

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/suppliers. Suppliers are required to handle your personal information in accordance with the privacy requirements;
- for health insurance, we may disclose your information to hospitals, medical and ancillary service providers to facilitate the provision of cover to you (for example, healthcare providers may contact us to ascertain if you will be covered by Bupa for your treatment);
- 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;
- if you are on a corporate health plan, we may disclose information to your employer or the broker arranging your cover in order to set up your policy and to verify your on-going eligibility to be on that corporate health plan;
- if you joined through a broker, migration agent or other agent, we may disclose your information to that party for the purposes of setting up and maintaining your policy.

If we send your information outside of Australia, we will require that the recipient of the information complies with privacy laws and contractual obligations to maintain the security of the data.

3.5 Use and disclosure of personal information on couples, family and single parent health insurance policies

If you are covered by a family, couples or single parent health insurance policy, you need to be aware who else on the policy can access your personal information.

For our health insurance products, each person on a membership aged 15 and over may complete a *'Keeping Your Personal Information Confidential'* form (available on our website) indicating their preferences regarding who should receive information about their health claims. When an individual on a policy turns 18, 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 in whose name the policy is registered 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 policy together and it is your responsibility to ensure that each person takes out their own policy. It is your obligation to notify Bupa if your circumstances change so that you are no longer eligible to be insured under a family or couples policy.

3.6 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. 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 we need it 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 except in limited permitted circumstances.

4. Travel, home, car and life insurance customers

4.1 Bupa Travel, Home and Car Insurance

Bupa and Bupa Australia Health Pty Ltd 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 travel, home or car insurance from Bupa, we will only collect information necessary for us to provide you with insurance products and services. This includes information necessary for us to provide you with insurance cover, underwrite insurance policies and consider claims.

The types of personal information we collect and hold will depend on the product or service you request, but may include:

- name and address
- age
- details of previous insurance history
- details of your personal assets (e.g. house and contents, motor vehicle)
- details of your spouse or partner
- health information if applicable (e.g. for travel insurance).

It is your responsibility to advise us of any changes to your personal details to ensure we can keep our records accurate and up to date.

We will use the information we collect to provide you with the insurance product or service you request.

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.

We may also disclose your information to other insurers, other parties as required by law, or to third party service providers such as investigators and assessors who are contractually required to comply with our privacy obligations.

4.2 Bupa life insurance customers

Bupa Australia Pty Limited (ABN 81 000 057 590) and Bupa Australia Health Pty Limited (ABN 50 003 098 655) are Authorised Representatives of ClearView Life Assurance Limited (ABN 12 000 021 581) (AFS Licence No. 227682) (**ClearView**) and are authorised to distribute and arrange for the issue of the insurance.

When you take out Bupa life insurance through ClearView, your information will be handled by ClearView in accordance with their Information Handling Policy available at bupa.com.au/other-insurance/life-insurance/about-bupa-life and in the Bupa life insurance Combined Financial Services Guide, Product Disclosure Statement and Policy Wording (also available online). You should refer to that policy for more information.

4.3 Bupa pet insurance customers

Bupa Pet Insurance is issued by The Hollard Insurance Company Pty Ltd (ACN 090 584 473; AFSL 241436) (Hollard) and administered by PetSure (Australia) Pty Ltd (ACN 075 949 923; AFSL 420183) (**PetSure**). Bupa Australia Pty Limited (ABN 81 000 057 590) is an Authorised Representative (AR 354269) of PetSure and is authorised to distribute and arrange for the issue of the insurance.

When you take out Bupa Pet Insurance through PetSure, your information will be handled by PetSure in accordance with their privacy policy available at petsure.com.au/Info/Privacy and in the Bupa Pet Insurance Combined Product Disclosure Statement, Policy Terms and Conditions and Financial Services Guide (available at bupa.com.au/pet-insurance). You should refer to that policy for more information.

5. Health coaching customers

This section outlines how your information will be handled if you participate in any health coaching program offered by Bupa. Bupa offers health coaching services through its agents, including Bupa Health Dialog Pty Limited. In this section, any references to 'we', 'us', 'our' or 'Bupa' includes any agent who provides the health coaching service to you on our behalf.

5.1 What information is collected if I participate in a health coaching program?

When you participate in a health coaching program, we will only collect your personal information for the purposes of offering, providing and administering health coaching services, health management programs and related services to you, and to ensure the services are provided to you in accordance with the law, and with our policies and procedures.

When you take part in health coaching and/or related services the information your health coach may collect includes:

- your name, address, telephone number and email contact details;
- your gender and date of birth;
- health information, which includes the treatments you have had or are planning to have, and health

conditions or ailments that you have suffered or may be at risk of suffering, and any other information that is relevant to your health;

- name and contact details of any person authorised to act on your behalf when speaking with us (known as a Health Partner or Personal Representative);
- if the health coaching program is made available to you through an organisation (for example, your employer) the name of the organisation on whose behalf we are contacting you;
- details of any correspondence and resources that we have sent you, such as brochures, information sheets or videos; details of any conversations we have had with you;
- records of our interactions with you including system notes and call recordings; and
- if you have been referred to the program from a healthcare provider (such as a GP, specialist or hospital), any information provided by that party as part of your referral.

5.2 How will my information be used or disclosed?

When you take part in a health coaching program, we use your personal information for the purposes of offering and providing health coaching and related services to you and to operate an efficient and sustainable business.

We may use your personal information to:

- contact you to advise you about health coaching and/or health management programs available to you to assist you in managing your health;
- confirm your identity when we speak to you via telephone (including confirming at least 3 points of identification each time we speak with you)
- develop and provide you with a tailored health coaching plan;
- answer your queries and provide you with health-related resources such as pamphlets, videos and online resources;
- carry out functions such as administration, audit (internal or external), accounting and information technology;
- practise effective risk management and quality control through auditing and compliance monitoring;
- carry out quality assurance;
- conduct customer satisfaction surveys and to otherwise evaluate our services;
- conduct marketing, research and statistical analysis;
- comply with any laws or regulation.

In addition, we may use de-identified information to conduct data analytics and to identify suitable candidates for health management programs.

In the course of providing health coaching services to you we may disclose your personal information to:

- your General Practitioner (if your General Practitioner has referred you to the program);
- if you have consented, to any other healthcare provider providing you care;
- any person authorised to act on your behalf (including a Health Partner or Personal Representative);
- any person or entity engaged by us or acting on our behalf for the purposes of providing you our services;
- where required, to a body having regulatory authority over any part of our business or affairs;
- where we are required or permitted by law to do so, including where we reasonably believe that disclosure is necessary to lessen or prevent a serious and imminent threat to your life, health or safety, or the life, health or safety of other persons; and

- if the health coaching program has been made available to you through a particular organisation (such as your employer), we may advise that organisation whether you have participated in a particular program or service.

5.3 Is the service confidential?

Yes, all information collected in the course of your participating in a health coaching program and your discussions with your health coach are treated confidentially and will not be disclosed, other than as outlined above.

5.4 Will my participation in health coaching affect my health insurance policy?

No, any health coaching program offered to Bupa members is at no additional cost and does not affect your health insurance policy.

Coaching programs are offered on Bupa's behalf by agents and the information collected from you when you participate in health coaching will not be disclosed to, or used by, Bupa's health insurance business and is treated confidentially at all times. However, note that Bupa will have a record of the programs and services that have been made available to you, if you have registered to take part in a program or service, or if you have requested that no further programs or services be offered to you.

6. Accessing and Correcting your Personal Information

6.1 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 within a reasonable time and in the manner requested by you, if it is reasonable to do so. 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 you would like information about a call recording with our call centre, we may arrange with you a time for you to listen to the call recording. Please note that we are unable to provide transcripts of calls.

If we are unable to give you access to the information you have requested, we will give you written reasons for this decision when we respond to your request. If you have any concerns about the refusal, please see section 8 for further information. 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.

6.2 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 your personal information is accurate, complete and up-to-date at the time of collecting, using or disclosing it. However, you should 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. We will respond to your request within a reasonable period and take reasonable steps to amend your records.

7. Your privacy online

7.1 Online data collection and use

When you access any Bupa website, we collect certain anonymous technical information 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.

For more information, please refer to the website terms and conditions on bupa.com.au/terms-and-conditions.

7.2 Cookies and analytics

We use cookies and industry standard analytics 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.

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 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.

7.3 Your privacy and myBupa

When you use myBupa services, we will keep a record of the fact that you have logged in, as well as a record of your transaction and user account history.

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

8. Contacting Bupa

8.1 Your feedback

If you have any questions, feedback or concerns about this policy or how your information is handled by Bupa, you can contact us at any time by calling us on 134 135.

You can also contact us by post, email or by visiting a Bupa centre. For all of our contact details, please visit bupa.com.au/contact-us.

Bupa will manage any concerns internally, directly with you. If, after contacting us, you still have concerns or don't understand a decision we've made, you can contact our Customer Relations team on the contact details

below:

Customer Relations
Bupa Australia
PO Box 14639
Melbourne VIC 8001

Telephone: 1800 802 386

Email: customerrelations@bupa.com.au

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.