

Health Partners

Privacy Policy Statement

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Our Privacy Commitment to You

Health Partners appreciates and highly values the relationship we have with you. As an important part of this relationship, we are committed to protecting the personal information that you entrust to us.

When providing our services to you, we ask that you disclose to us certain personal information about yourself. Typically, this will include your name, address, age and other contact details. Depending upon your type of policy, we may also require personal information about your family members covered by your policy. In other respects, this may include health information or other sensitive types of information. To protect the privacy of all persons covered the main member is required to inform any dependant aged 16 years and over of the existence of the Health Partners Privacy Policy and to seek their consent before providing their information to Health Partners. They should also be made aware that we may provide benefit information to the main member unless we have been requested not to do so by those other persons covered. Without your personal information, we are unable to provide a comprehensive range of health benefits or the level of service that our members have come to expect from us.

Our privacy commitment to you is simple:

- we will make every effort to ensure all personal information about you is protected against misuse; and
- we will be open with you regarding the uses to which we put your personal information.

Our aim is to ensure that our members are confident any personal information held by us is treated with an appropriate degree of confidentiality and privacy.

This Privacy Policy sets out our privacy commitment to you. Please read the Privacy Policy carefully and if you have any questions, please contact us for further information. Your enquiries are always welcome.

National Privacy Principles

Health Partners is bound by the National Privacy Principles (**NPPs**) set out in the Commonwealth *Privacy Act 1988*. The NPPs form a minimum standard for the protection of your personal information against improper disclosures and unintended uses.

In general, the NPPs regulate the way Health Partners is able to collect, store, use and disclose your personal information, including any sensitive information (such as information about your health and well-being). Under the NPPs, '**personal information**' is any information (or an opinion) about you from which your identity is apparent, or can reasonably be ascertained. This includes most information that is stored with or linked to your name, address, or other identifying features. Personal information also includes health information.

Your Personal Information

The types of personal information Health Partners holds about you generally depends upon the nature of your relationship with us, the type of policy you hold, the number of people in your family covered by our policy, and the extent to which you (or your dependants) have used our services.

Typically, we hold details of your name, address, age, dependants and standard contact details (including telephone and facsimile numbers as well as email addresses). We may also hold certain financial information about you, such as bank account and credit card details and Medicare details as well as information about contribution payments and your benefit claims history.

We will most likely hold sensitive information about you from time to time, including health information. The types of sensitive information that we collect and hold may include details about health services provided to you by a health services provider (either on behalf of Health Partners or otherwise).

The privacy obligations outlined in this Privacy Policy do not apply to all personal information held by Health Partners. For instance, this Privacy Policy does not apply to Health Partner's employee records or to any acts or practices of Health Partners in relation to an employee record.

Collection of Personal information

Health Partners only collects personal information which is necessary to provide you with our business functions and activities, and the provisions of our high quality services and products. We collect your personal information for the primary purpose of enabling us to provide health benefits to you and to fulfil our legal obligations as a registered health benefits organisation.

We also collect your personal information for a range of other secondary purposes that are directly related to the primary purpose, as well as for some unrelated secondary purposes where you have given your consent.

Sensitive information (including health information) will only be collected with your consent or as authorised by the NPPs or generally by law.

At or before the time we collect personal information about you (or if that is not practicable, as soon as practicable thereafter), the NPPs require us to provide you with a statement outlining our privacy commitment to you, the manner in which your personal information will be handled by us, and how you may access and correct your personal information held in our records.

Health Partners only collects the personal information it requires by lawful means and in as unintrusive manner as possible. In the majority of cases this information will be collected directly from you (or your dependants) in written forms you complete and provide to us, by telephone contact, in person, by our representatives, or by other written correspondence from time to time.

Sometimes your personal information may be collected directly from a third party, such as government agencies or from health service providers (including hospitals, doctors and other

medical and allied health professionals) who have provided products or services to you (either on behalf of Health Partners or otherwise), as well as a range of other service providers.

If personal information about you is received from a third party, and if the NPPs or the law requires us to do so, we will take reasonable steps to ensure that you are notified of the collection of that information and that you receive appropriate privacy-related disclosures.

If, on the other hand, you provide us with personal information about another individual, you must first ensure that the other individual is aware of:

- the disclosure of their information to us and the purposes for which we collect it; and
- the individual's ability to request access to the personal information we hold about them, and to advise us if they think that information is inaccurate, incomplete or out of date.

Use and Disclosure of Personal Information

Health Partners may use and disclose your personal information for the primary purpose for which that information was collected (see **Collection of Personal Information**), as well as other reasonably expected secondary purposes, where you have consented, and otherwise in accordance with the NPPs. Those uses include the following:

- to provide our health benefits scheme and other products and services to you;
- to administer and process health benefits claims lodged by you (or on your behalf);
- to process applications for new memberships, and to administer existing memberships on a day-to-day basis;
- for information technology requirements, systems maintenance and development issues;
- to provide information to agents, contractors, service providers and external advisers (including health services providers) engaged by Health Partners to deliver products or services to you, or to act on behalf of Health Partners, or to provide products or services to us. Bear in mind that the identity of these agents, contractors, service providers and external advisers may change from time to time;
- to investigate and resolve complaints concerning the provision of products or services by Health Partners (or others associated with us, including other health services providers);
- marketing initiatives, including to provide you with updates and other information about the goods, services and activities of Health Partners (and others associated with us);
- for any secondary purpose to which you consent;
- in order to comply with any legislative and regulatory provisions; and
- in relation to the transfer of assets to any third party, or part of any legal restructure or reorganisation.

Additional uses and disclosures may be conveyed to you at the point of collection of your personal information.

We will take reasonable steps to inform you about, and to obtain your consent to, any proposed use or disclosure of your personal information for a purpose which is not a primary purpose or a related secondary purpose for which the information was collected (unless that proposed use or disclosure is otherwise permitted under the NPPs).

Other Uses and Disclosures of Personal Information

Health Partners may disclose your personal information to third parties who provide goods or services to us, or to you or other parties on our behalf for purposes such as:

- health benefits claims administration and processing;
- IT systems maintenance;
- product development, marketing and research purposes; and
- Internal or external Audit purposes.

In those situations Health Partners has put in place arrangements or understandings with those third party contractors to ensure that your personal information is handled in a way that is consistent with our obligations under this Privacy Policy and the NPPs.

We may also disclose your information to Government departments and agencies where the law requires us to do so, or to credit reporting agencies or other credit providers.

The types of organisations Health Partners may disclose your personal information to include the following:

- our agents, contractors, service providers and external advisers that provide products or services to us, or to you or other parties on our behalf from time to time. This includes payment system operators, mail houses, recruitment organisations and research providers;
- Commonwealth and State health authorities, and government agencies (including the Health Insurance Commission);
- the Private Health Insurance Administration Council;
- health service providers including hospitals, doctors, specialists and other medical and related professionals in connection with your membership, health or well-being;
- your executor, administrator, trustee, guardian, attorney or legal personal representative; and
- your employer, if part of a payroll deduction scheme.

From time to time, Health Partners may also develop or identify other products or services that may be of use or benefit, or of interest to you. In these circumstances, Health Partners may use your personal information to inform you of these products or services, or to market those products or services to you. This may include information about our own products and services, or the products or services of other parties.

You may contact us at any time to advise that you no longer wish to receive this marketing information from us, and we will remove you from our mailing lists. Please be sure to include your name, address, telephone number and any other relevant details in your notification, so that we can capture all personal information held in our records.

Please also note that we will still contact you for administrative purposes in relation to your membership, process your health benefits claims, notify you about important changes and respond to your enquiries even if you unsubscribe from our mailing list.

Transfers of Personal Information Outside Australia

Health Partners will only transfer personal or sensitive information outside of Australia in accordance with the NPPs including:

- with your consent;
- where we are under a contractual obligation to do so, or there is some other identifiable benefit to you; or
- where we are satisfied that the recipient of the information will uphold principles for the fair handling of personal information, and will not deal with your personal or sensitive information in a manner inconsistent with the NPPs and this Privacy Policy.

Laws Requiring the Collection of Information

You should be aware that Health Partners is required under Commonwealth and State health legislation to collect, store and disclose certain personal information about individuals from time to time. For instance, the *National Health Act 1953* (Cth) requires us to collect certain sensitive information as a condition of registration as a registered health benefits fund. In these situations, Health Partners does not require, and will not seek, your consent to act in accordance with legislation.

Consent

By providing sensitive information about yourself (and your spouse/partner or dependants) to Health Partners, claiming for benefits or otherwise utilising our services (which may involve the collection of sensitive or health information from third parties) you will be considered to have given:

- consent to the collection of your sensitive information from you (or those third parties);
- (on behalf of any dependants aged under 18 years) their consent to the collection of that sensitive information about them from you (or those third parties); or
- (on behalf of any dependants aged 18 years and over) consent to the collection of that sensitive information about them from you (or those third parties), with their authority.

If you are the contributor of the membership, you are responsible for ensuring everyone on your membership is aware that Health Partners may collect, use and disclose their personal and health information for the purposes of providing their cover and verifying that appropriate benefits are paid.

Once your consent has been obtained, by becoming a member or otherwise making use of Health Partners' services, you will be considered to have consented to the use of your personal information (and that of your spouse/partner or dependants) for any secondary purposes, until such time as your consent is withdrawn. Consent to the use of personal information for a secondary purpose may be withdrawn at any time by notifying Health Partners in writing.

By providing consent to Health Partners, you are taken to have agreed as follows:

- you consent to the use and disclosure of your personal information (and that of your dependants) for the primary and secondary purposes described in this Privacy Policy; and
- you authorise all health service providers (including hospitals, doctors, specialists and other medical and allied health professionals) and members of your family (where appropriate) to supply to Health Partners, from time to time, full and complete details of all or any medical treatment, hospitalisation, injury, disease, ailment or diagnoses concerning you or your dependants. You acknowledge that you have the consent of each dependant aged 18 years and over to give this authority on their behalf.

Security and Quality of Personal Information

Health Partners will endeavour to take all reasonable steps to ensure that the personal information we collect, store, use and disclose is up to date, complete and accurate.

We will also take reasonable steps to protect your personal information from misuse, loss and from unauthorised access, modification or disclosure in accordance with the requirements of this Privacy Policy and the NPPs.

Personal information is held in electronic form on database systems administered by Health Partners. All electronic information is protected by password security and other industry standard data protection measures. Some hard copy information is stored in secure facilities at Health Partners' premises.

Our procedures enable only authorised persons to access personal information and only as required for reasonable and legitimate business purposes. Our systems for storage and security of personal information will be reviewed at regular intervals.

Anonymity

Wherever it is lawful and practicable to do so, Health Partners will extend to members the option of remaining anonymous when dealing with us. You should be aware, however, that most of our products and services are unable to be provided on an anonymous basis, and therefore will not be available if you choose to remain anonymous.

Requests for Access to and Correction of Personal Information

You have the right to seek access to the personal information Health Partners holds about you, or any of your dependants aged under 18 years, with the exception of dependants under this age who have requested their information remain confidential or about any dependant of impaired capacity.

You may also apply to have personal information changed if you feel that it is inaccurate, incomplete or out-of-date. To do so, a written request must be forwarded to:

Manager Member Services
Health Partners
86 Pirie Street
ADELAIDE SA 5000

As part of our verification procedures, requests for access to information must be accompanied by identification documents. Photocopied identification documents are not acceptable. We apologise for any inconvenience this may cause, but we view this as a reasonable measure to protect against improper disclosure of your personal information.

Health Partners may charge a small administrative fee for providing you with your information, in order to cover our costs. You will be advised of the amount at the time you request your information.

You should be aware that under the NPPs, Health Partners may deny some requests for access to personal information in circumstances that include the following:

- where providing access would pose a serious threat (or in the case of personal information other than health information, a serious and imminent threat) to the life or health of any individual;
- providing access would have an unreasonable impact upon the privacy of any other individual;
- a request for access is, in Health Partners' opinion, frivolous or vexatious; or
- a denial of access is required or authorised in accordance with the NPPs or at law generally.

The NPPs require that written reasons be provided if Health Partners denies a request for access to personal information.

Health Partners will correct any personal information that is incorrect, incomplete or out-of-date, and will not refuse to make a correction without providing you with a reason for the refusal.

Access and Correction Rights of Young Persons and Impaired Persons

Health Partners gives the following special consideration to young persons and persons of impaired capacity:

Health Partners will be:

- answerable to any dependant aged 18 years and over regarding any request for access to and correction of personal information relating to that dependant, to the exclusion of that dependant's parents or other relevant adults. This will not apply where the dependant demonstrates an inability to exercise sound judgement because of a mental impairment, in which event Health Partners will respond to any access request in accordance with the *Privacy Act* and the NPPs; and

- answerable to any person lawfully representing the interests of a dependant aged under 18 years, or any persons of impaired capacity, regarding any request for access to or correction of personal information relating to that person, to the exclusion of that person and adults other than the lawful representative. This will not apply where the dependant aged under 18 years has a demonstrated capacity to exercise sound judgment. In such a case, Health Partners will respond to all access and correction requests by and in respect of young persons and persons of impaired capacity in a responsible manner, having regard to the interests of the persons involved and at all times in accordance with the Privacy Act and the NPPs.

Complaints

Under the *Privacy Act*, it is your right to make a privacy-related complaint to Health Partners if you believe your privacy rights have not been observed. Privacy complaints should be directed to our Member Services (listed above).

We will make every effort to resolve any privacy complaint that you may have and provide you with responses to your queries or comments.

You may also contact Health Partners to discuss any privacy-related issues you have or concerns arising from the way we use your personal information.

Changes to this Privacy Policy

This Privacy Policy is current at Update. Health Partners may periodically review and update this Privacy Policy from time to time to take account of new privacy-related laws, changes to its operations and practices (or the operations and practices of others associated with Health Partners, such as health services providers), as well as the community's changing privacy expectations.

For Further Information

The latest version of the Privacy Policy will always be available on the Health Partners website at www.healthpartners.com.au, or a copy can be obtained by contacting Health Partners' Member Services at any time.

The NPPs are available from the Office of the Federal Privacy Commissioner, or via the website at www.privacy.gov.au.