



GMHBA LIMITED PRIVACY POLICY

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ABN 98 004 417 092

GMHBA Ltd Privacy Policy – Contents

1. Introduction	2
1.1 Who we are	2
1.2 Definitions	2
1.3 Protecting your privacy	3
2. Collection of your personal information	3
3. Provision of information about another person	4
4. Collection of information via our website	4
5. Purposes for which we collect, hold, use and disclose your personal information	5
6. To whom we disclose your personal information	6
7. Accessing and correcting your personal information	7
7.1 Private Health Insurance	7
7.2 Health Related Business	7
8. Contact us and complaints about privacy	9
9. Transfer of information outside Australia	9
9.1 Health Insurance & Health Related Businesses (excludes OVHC)	9
9.2 Frank Overseas Visitor Health Cover	10
10. Security of your information	10
11. Retention of information	10
12. Direct Marketing	11
13. Dealing with us anonymously	12
14. Use of Website	12
15. Changes to this privacy policy	12

1. Introduction

1.1 Who we are

In this privacy policy:

‘we’, ‘us’ ‘our’ refers to GMHBA Limited (ABN 98 004 417 092) the health insurance businesses including the following brands – GMHBA Health Insurance, Frank Health Insurance (includes Frank Overseas Visitor Health Cover), and health related businesses (GMHBA Eye Care, Dental Care and Care Co-ordination Service), South Barwon Medical Centre, Lara Medical Centre and Geelong Physiotherapy;

‘you’, ‘your’ refers to a customer, patient, policy holder or fund member.

Where a privacy standard applies differently or where the context requires within this Privacy Policy it will be referenced under that business name or entity accordingly.

1.2 Definitions

clinical records whether electronic or not, are a collection of information about a patient's healthcare that are essential for his or her present and future care.

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 permission over the phone for all health insurance brands or face to face in our branch network where applicable). 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.

customer means a person who is currently receiving, or has previously received, products or services from us.

fund member means an adult member or any dependant covered by a GMHBA Limited health insurance membership.

health information includes information or an opinion about the health or a disability of an individual, the individual's wishes about the provision of health services, or health services provided or to be provided to an individual.

patient is a person receiving or registered to receive health care treatment from our health-related businesses.

policy holder means a person who holds a health insurance policy with GMHBA Limited; usually, the person in whose name the health insurance policy with GMHBA Limited is written.

personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. It includes sensitive information and health information.

sensitive information includes:

- health information; and
- information or an opinion about an individual's racial origin, political opinion, membership of a political association or trade union, religious beliefs, sexual preferences or criminal record.

1.3 Protecting your privacy

GMHBA Limited is committed to protecting your privacy. The privacy policy explains the type of personal information (including sensitive information, particularly health Information) we collect and how we handle that information as a part of your relationship with GMHBA Limited.

We understand that the information that you entrust to us is private and confidential. Our staff are trained to respect your privacy in accordance with the applicable privacy laws and our own policies and procedures.

2. Collection of your personal information

Personal information collected by GMHBA Limited includes your name, date of birth, address and contact details and may also include your bank account or credit card details. If you pay your health insurance premium by payroll deduction, we may also collect your employer's details.

Sensitive information collected by GMHBA Limited includes information about your health or medical history. Details of previous health care professionals you've been a patient of may also be collected by our health-related businesses.

We generally collect personal information in person, in writing, by telephone, email or via our website. For example, we may collect information when you: obtain a quote from us, make an application for health insurance, submit a health insurance claim, make an appointment, complete forms, provide information during a visit to one of our health related practices, purchasing of goods, have customer interactions with us where we record system notes and voice recordings of telephone conversations or if you use our webchat function.

We may also collect your personal information from third parties such as:

- Our strategic partner, the Australian Health Service Alliance (AHSA) for the purposes of providing health services to you and/or managing the funding of those services, or as required by law. For further details please refer to the '[AHSA Privacy Policy](#)',
- Hospitals and other healthcare providers in order to process your private health insurance claims, conduct eligibility checks and to comply with laws such as the Private Health Insurance Act 2007 (Cth) and the National Health Act 1953 (Cth),
- Your previous health fund to cancel your membership and request a transfer certificate,
- The policy holder (who is the person responsible for the management of your private health insurance membership) or a person authorised to provide us with information on your behalf in order to provide you with private health insurance cover, Overseas Visitor Health Cover and pay you benefits,
- Organisations engaged by GMHBA Limited to carry out functions on our behalf such as mail and data processing,
- From other health related service providers for our health-related businesses (e.g. if you were referred to us by another health care professional),
- Other health related services such as your health care service provider, private health insurance provider and Medicare for our health insurance businesses,
- Intermediaries who provide private health insurance information and services on behalf of our health insurance businesses,
- Recruitment Agencies when appointing employees and contractors,
- Our health insurance businesses, health related businesses and wholly controlled entities, and,

We may also use your personal information for marketing purposes. For example, for the direct marketing of products, promotions and services by all private health insurance businesses and health related businesses.

If you purchase AIA Vitality and choose to activate your AIA Vitality membership, we will also collect personal information from AIA Australia who administers the AIA Vitality health and wellbeing program. For example, knowing activities you have undertaken as part of the AIA Vitality program and the Vitality points you have earned. For further details please refer to the '[AIA Australia Group Privacy Policy](#)'.

If you choose not to provide us with personal information, we may not be able to provide you with the services you require. For example, we may not be able to pay health insurance benefits, assess or adjust your lifetime health cover loading or apply an entitlement to the Australian Government Rebate on private health insurance as a premium reduction.

3. Provision of information about another person

If you provide us with personal information about other individuals (such as other persons on your health insurance membership or other immediate family members), you must ensure that they are aware, or will be made aware, of your provision of their personal information to us and how their personal information will be handled under this privacy policy.

If the information you are providing to us is health information or sensitive information, you must first obtain the individual's consent to disclosing the information to us.

If you are responsible for the management of your private health insurance membership by:

- Taking out private health insurance with us, or
- Providing your personal (including health and sensitive) information to GMHBA Limited, or you, or your spouse/partner and/or dependant children (if any), providing your spouse/partner's and/or dependant children's personal (including health and sensitive) information to GMHBA Limited for whatever purpose,

...you consent to and warrant that your spouse/partner and/or dependant children have consented to, GMHBA Limited collecting, using and disclosing your and/or their personal (including health and sensitive) information, however collected by us, in accordance with this privacy policy.

4. Collection of information via our website

When you first visit our website, information about your computer or web device is automatically recorded by our website. This includes your IP address, your top-level domain name, the date and time of your visit to our site, the pages you accessed or downloaded, the address of the last site you visited, your operating system and the type of browser used.

This information is collected for statistical and administrative purposes, and to improve our web-based services. It does not readily identify individuals, and we will not attempt to identify individuals from the records our server generates unless it is necessary to do so for law enforcement purposes.

We may also use cookies to assign your device a user ID. Cookies contain information that allows us to identify your device. We may use this information to determine whether to display standard content. You can configure your browser so that it does not accept cookies, however this may minimise our ability to provide you with customised information.

We use a third-party service to collect general information about how people use our website. This anonymous information is aggregated and doesn't reveal personally identifiable information about anyone who uses our website.

Further details can be found in the Website Terms of Use on the GMHBA Limited website.

5. Purposes for which we collect, hold, use and disclose your personal information

GMHBA Limited collects, holds, uses and discloses your personal information to provide you with private health insurance, health related care and health and wellness related services including to:

- Manage our ongoing relationship with you,
- Answer any queries you may have in relation to:
 - our private health insurance products,
 - overseas visitor health insurance cover,
 - our health care services and products, and
 - health and wellness related services.
- Administer, process and audit:
 - private health insurance claims and pay private health insurance benefits,
 - patient files, including invoicing for health care services, and
 - credit card payments or to collect unpaid invoices.
- Process payments in respect of:
 - your health insurance premiums and claims, and
 - your product purchases.
- Contact you in relation to any matter relating to you or the health care service or products provided to you,
- Assess what other services you may derive a health benefit from and to facilitate the provision of such services and will assist us to have an integrated view of members to provide a better and more personalised service,
- Follow you up regarding further examinations or treatments required,
- Carry out any internal functions such as administration, accounting, quality assurance and information technology,
- Assess your general health and wellbeing needs and to continue to meet those needs through chronic disease management programs, health management programs and coaching programs or services,
- Provide you with the opportunity to participate in our fitness groups and/or attend health seminars and community health events,
- Provide you with information and promotions for Eye Care, Dental Care, Care Coordination Services and Chronic Disease Management Programs,
- Provide you with access to the health and wellbeing program;
- Conduct customer surveys including satisfaction and net promoter surveys,
- Conduct marketing, research and analysis,
- Provide you with access to the website member portal area for each membership health insurance brand to manage your own private health insurance membership and, for certain membership brands, a web chat function,
- Manage, review, develop and improve our private health insurance products, overseas visitor health insurance cover and related services (including health and wellness services) whether

- provided by us or other parties,
- Confirm eligibility of a membership and/or health insurance membership,
 - Resolve complaints or follow up on incidents, and
 - Pay a commission to a broker if applicable.

We may also collect, hold, use and disclose your personal information to:

- Your nominated relatives in an emergency for health care related businesses,
- Government and regulatory bodies such as Medicare,
- All private health insurance businesses, health related businesses and wholly controlled entities (for example you may receive direct marketing material from GMHBA Eye Care practices),
- Resolve any legal and/or commercial complaints or issues including compensation recovery or where we are required by law (e.g. compulsory notices from courts of law, tribunals or government agencies),
- Meet legislative requirements relating to private health insurers and Overseas Visitors Health Cover,
- Auditors and other services providers who we may appoint to ensure integrity of our operations and services,
- Carrying out a review of the practice for the purposes of improving the quality of care provided for health-related businesses,
- Any other person or entity acting on our behalf,
- Other healthcare professionals, for seeking a second opinion or a referral where you have consented to us obtaining the second opinion or the referral for health-related businesses,
- To third party health benefits providers and insurance companies to assist in the processing of a claim for reimbursement or payment of all or part of the cost of treatment submitted by you or on your behalf,
- Train our personnel,
- Recruit GMHBA Limited personnel,
- Organisations that facilitate the sending of emails and SMS, and
- Perform any of our other functions and activities relating to our business.

We will generally only use personal information for the purpose for which it is collected, or for a purpose that is related to, or in the case of sensitive or health information, directly related to, the purpose for which it was collected.

6. To whom we disclose your personal information

GMHBA Limited includes all private health insurance businesses, health related businesses, and wholly controlled entities. GMHBA Limited will not sell or disclose your personal details for any purpose that is not related to your relationship with us.

We rely on third parties such as mail-houses, data processing organisations and financial institutions to perform specialised activities for GMHBA Limited and your personal information may be provided to these third parties to enable them to perform their agreed services.

In order to carry out our functions and activities, we may disclose your personal information to some service providers that are located outside of Australia. For example, organisations that facilitates the sending of emails and SMS which are located in the USA.

We do not disclose information outside of Australia unless we take steps as are reasonable in the circumstances to ensure that the overseas recipient will not breach the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) in relation to the information.

GMHBA Limited may also be required to disclose your personal information to comply with law, including the Private Health Insurance Act 2007 (Cth) and the National Health Act 2001 (Cth).

We may disclose personal information for the purposes described under the heading 'Purposes, for which we collect, hold, use and disclose your personal information' to our health insurance businesses, health related businesses and wholly controlled entities, contracted services providers (such as mail houses and data processing organisations), government authorities (such as Medicare Australia, and for Overseas Visitors Health Insurance the Department of Immigration and Boarder Protection), our strategic partner of the health and wellbeing program (AIA Vitality Australia), hospitals, medical and general treatment providers, persons authorised by you and our professional advisors, as well as to financial institutions to process payments.

We do not disclose or share health information or clinical records between our private health insurance and health related businesses.

If you are not the policy holder of your health insurance membership, GMHBA Limited may also disclose your personal information to the policy holder as part of administering the membership and paying benefits. This may include the disclosure of sensitive and health information about benefits claimed by you under your membership in the form of quarterly and annual benefit statements.

We may also disclose personal information to parties involved in a prospective or actual transfer of our assets or business.

7. Accessing and correcting your personal information

We try to ensure that personal information we hold is accurate, complete and up to date. Please let us know if there are any errors in your personal information and keep us up to date with changes to your personal information such as change of address.

7.1 Private Health Insurance

You can request to update your personal information by calling us on the telephone number listed in Part 8 of this policy), visiting a branch if available in your location or online via the self-service member centre for health insurance brand:

www.gmhba.com.au

www.frankhealthinsurance.com.au

www.frankaustralia.com.au (Frank Overseas Visitor Health Cover)

7.2 Health Related Business

GMHBA Eye Care Practices

You can request to update your personal information by:

- Emailing eyecare@gmhba.com.au
- Visiting gmhbaeyecare.com.au

- Calling us on one of the telephone numbers listed below:
 - Geelong: Westfield, 95 Malop Street Geelong Ph: 5202 9214
 - Wauron Ponds: Wauron Ponds Shopping Centre Ph: 5243 9596
 - Leopold: Gateway Plaza Leopold Ph: 5297 3700
 - Ballarat: 208 Sturt Street Ballarat Ph: 5326 0100

GMHBA Dental Care Practices

You can request to update your personal information by:

- Emailing dentalcare@gmhba.com.au
- Visiting www.gmhbadentalcare.com.au
- Calling us on one of the telephone numbers listed below:
 - Geelong: 118-20 Ryrie Street Geelong Ph: 5229 5142
 - Portland: 47 Henty Street Portland Ph: 5523 1485

GMHBA Care Coordination Service

You can request to update your personal information by:

- Emailing ccs@gmhba.com.au
- Visiting www.gmhba.com.au
- Calling 1300 446 422

South Barwon Medical Centre

You can request to update your personal information by:

- Emailing sbmc@sbmc.net.au
- Visiting www.sbmc.net.au
- Calling 5243 1111

Lara Medical Centre

You can request to update your personal information by:

- Emailing jy@laramedical.com.au
- Visiting www.laramedical.com.au
- Calling 5282 1926

Geelong Physiotherapy

You can request to update your personal information by:

- Emailing reception@geelongphysiotherapy.com.au
- Visiting <https://www.geelongphysiotherapy.com.au/>
- Calling 5224 2223

GMHBA Limited will also allow you to access personal information we hold about you as required by law.

You can request to access personal information we hold about you by contacting our Privacy Officer (whose details are provided in Part 8 of this policy).

To access your clinical and health-related service records, you may do so by contacting our Health Services Operations Manager on 1300 446 422 or by emailing service@gmhba.com.au and addressing your email to the attention of the Head of Operations Health & Retail.

If we do not provide you with access to your personal information, or refuse to correct your personal information, we will advise you of the reasons for the refusal in accordance with law.

In some circumstances we may require you to pay the reasonable cost of providing access to personal information we hold about you.

8. Contact us and complaints about privacy

If you have any queries, concerns or complaints about the manner in which your personal information has been collected or handled by GMHBA Limited, please:

- Contact a GMHBA Limited representative
You can talk to a representative by visiting a branch, calling 1300 446 422, emailing service@gmhbalimited.com.au or visiting www.gmhbalimited.com.au and webchat. We respond to all our telephone calls and webchat during business hours and will follow up all e-mail and telephone messages within 24 hours.
- Contact our Complaints Manager
The Complaints Manager will acknowledge your correspondence within 5 working days. We will investigate your concern and/or complaint, keep you informed of our progress and provide you with a response in a timely manner.

The Complaints Manager
GMHBA Limited
PO Box 761
Geelong VIC 3220

It is our intention to use our best endeavours to resolve any privacy related complaint to your satisfaction.

- Write to us
The Privacy Officer will acknowledge your correspondence within 5 working days. We will investigate your concern and/or complaint, keep you informed of our progress and provide you with a response in a timely manner.

The Privacy Officer
GMHBA Limited
PO Box 761
Geelong VIC 3220

However, if you are unhappy with our responses, you may contact the Office of the Australian Information Commissioner at www.privacy.gov.au who may investigate your complaint further.

9. Transfer of information outside Australia

9.1 Health Insurance & Health Related Businesses (excludes OVHC)

From time to time we may need to disclose your personal information to organisations located outside of Australia in the ordinary course of everyday business.

We are responsible for taking reasonable steps to ensure the overseas organisations comply with Australian Privacy Laws.

The country to which we may disclose personal information in the course of our functions and activities is listed below:

- United States
- Canada

This list is updated from time to time.

9.2 Frank Overseas Visitor Health Cover

Due to the nature of Overseas Visitor Health Cover (OVHC) products and services, it may be necessary to disclose your personal information to people or organisations outside Australia. The recipients of your personal information will generally be located in your original country of residence where you are departing to Australia from and include:

- your employer
- anyone you permit us to disclose your personal information to our agents and brokers

OVHC will otherwise not disclose your personal information to anyone unless:

- you give us your permission to do so
- your safety or the safety of others in the community is at risk
- OVHC is permitted to do so under the Privacy Act 1988 (Cth); or
- OVHC is required or authorised by or under an Australian law or court or tribunal order.

10. Security of your information

We may store personal information we hold in hard copy documents or as electronic data in our software IT systems (and those of our service providers). We endeavour to take reasonable steps to protect all personal information that we hold from misuse and loss and to protect it from unauthorised access, modification and disclosure.

The methods we use to ensure your information is secure include:

- GMHBA Limited employees are bound by confidentiality agreements and the Private Health Insurance Code of Conduct if an employee of private health insurance businesses,
- Verification procedures to identify an individual before access is allowed for personal information,
- Confidentiality agreements with all agents, brokers and sub-contractors,
- The use of data encryption, firewalls and other security systems for our IT platform, and,
- Document storage security policies.

11. Retention of information

We generally retain personal information we hold for as long as it is necessary to perform the function in relation to which the information was collected. However, we may retain personal information for longer periods to comply with legislative requirements for document retention. If personal information is deleted from our database, it may be retained in de-identified form on the servers of our internet service provider.

12. Direct Marketing

From time to time we may contact you to provide you with information about other promotions, products and services offered by us, or other service providers who have a relationship with us, that we consider may be of benefit to you and your family. This includes information about our health-related businesses that may help improve your health and wellbeing. When we contact you it may be via mail, phone, email and/or SMS.

When you become a policy holder, fund member, patient or customer, you consent to us and our service providers using your personal information for direct marketing purposes (for an indefinite period including after you may cease your membership with us), unless you contact 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 by:

Private Health Insurance

Email: service@gmhbalimited.com.au

Webchat via gmhbalimited.com.au

Calling: 1300 446 422

Mail: GMHBA Limited, PO Box 761 Geelong 3220

GMHBA Eye Care Practices

Email: eyecare@gmhba.com.au

www.gmhbaeyecare.com.au

Calling: Your local health care practice listed in this policy

Mail: Eye Care, PO Box 4016 Geelong 3220

GMHBA Dental Care Practices

Email: dentalcare@gmhba.com.au

www.gmhbadentalcare.com.au

Calling: Your local health care practice listed below

Mail: Geelong: 118-20 Ryrie Street Geelong Ph: 5229 5142

Portland: 47 Henty Street Portland Ph: 55231485

GMHBA Care Coordination Service

Email: ccs@gmhba.com.au

Calling 1300 446 422

Mail: GMHBA Limited, PO Box 761 Geelong 3220

South Barwon Medical Centre

Email: sbmc@sbmc.net.au

Calling: 5243 1111

Mail: 66 Settlement Road

Belmont 3216

Lara Medical Centre

Email: jy@laramedical.com.au

Calling: 5282 1926

Mail: 1 Patullos Road Lara 3212

Geelong Physiotherapy

Email: reception@geelongphysiotherapy.com.au

Calling: 5224 2223

Mail: 42 Bellerine Street Geelong 3220

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 bills, statements, appointment reminders and notices that are relevant to the products and services you hold with us.

13. Dealing with us anonymously

When you use our website or ask for general information, we may deal with you without requiring you to provide personal information. However, aside from those circumstances, the nature of our business is such that it is generally not possible for us to deal with people on an anonymous basis.

14. Use of Website

Our website may contain links to other websites that are not owned, operate or endorsed by us. We are not responsible for the privacy practices of those websites, or for the content, products or services provided by or contained on those websites.

Further details can be found in the Website Terms of Use on the website of each health insurance brand.

15. Changes to this privacy policy

We may change this privacy policy from time to time. We recommend that you review the privacy collection statement that is relevant to your membership brand and this privacy policy from time to time.