Privacy Policy

GMHBA Limited

Effective 10 December 2026

GMHBA HEALTH INSURANCE

1. Contents

1. Introduction 3

1.1 Who we are

1.2 Definitions

1.3 Protecting your privacy

2. Collection of your personal information 4

3. Provision of information about another person 5

4. Collection of information via our digital platforms 5

5. Purposes for which we collect, hold, use and disclose your personal information 6

6. To whom we disclose your personal information 7

7. Accessing and correcting your personal information 8

7.1 Private Health Insurance

7.2 Health Services Business

8. Contact us and complaints about privacy 9

9. Transfer of information outside Australia 10

9.1 Health Insurance & Health Services Businesses (excludes OVHC)

9.2 Frank Overseas Visitor Health Cover

10. Security of your information 10

11. Retention of information 11

12. Use of de-identified and aggregated information 11

13. Direct Marketing 11

14. Use of artificial intelligence and automated decision-making 11

14.1 Private health insurance businesses

14.2 Health services businesses

14.3 Personnel

15. Dealing with us anonymously 13

16. Changes to this privacy policy 13

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1. Introduction

1.1 Who we are

In this privacy policy:

'GMHBA', 'we', 'us' and **'our'** refers to GMHBA Limited (ABN 98 004 417 092) including its health insurance businesses under the following brands – GMHBA Health Insurance and Frank Health Insurance (includes Frank Overseas Visitor Health Cover) - and its health services businesses including GMHBA Care Co-ordination Service, GMHBA Eye Care, GMHBA Dental Care, GMHBA Hub's, GMHBA Medical, GMHBA Physiotherapy, South Barwon Medical Centre and Lara Medical Centre.

'you' and **'your'** means any person about whom GMHBA holds personal information. Where a privacy standard applies differently with respect to a GMHBA business, or where the context requires within this Privacy Policy, it will be referenced under that business name.

1.2 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 permission over the phone or face to face 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 health insurance membership.

health information includes:

- Sensitive information; and
- 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 and includes your claims.

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

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 including health information.

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

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 is committed to protecting your privacy. This privacy policy explains the type of personal information we collect and how we handle that information as a part of your relationship with GMHBA.

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.

In this Privacy Policy, a reference to personal information includes sensitive information including health information.

2. Collection of your personal information

Personal information collected by GMHBA includes, among other information, 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 including health information collected by GMHBA includes information about your health or medical history. Details of health care professionals you've been, or are, a patient of may also be collected, including by our health services businesses. In more limited circumstances, we may also collect other sensitive information such as your country of citizenship or racial or ethnic origin (for example, if you purchase Overseas Visitors Health Cover), gender identity, criminal record (for example, as part of employment screening) or membership of a professional or trade association (for example, for health practitioner credentialling).

We generally collect personal information in person, in writing, by telephone, email, electronic form and via online services including, but not limited to, our website and mobile app.

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 services practices, purchase goods, use our digital platforms or have customer interactions with us where (with your consent) we may record telephone and in-person conversations and transcribe system notes.

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,
- If you are a spouse or partner, or dependant child, covered by a couples, single parent or family health insurance policy (as applicable), the policy holder (who is the person responsible for the management of your private health insurance membership) in order for them to set up and manage the policy,
- A person you have authorised to provide us with information on your behalf,
- Organisations engaged by GMHBA to carry out functions on our behalf such as mail and data processing,
- Government and regulatory bodies such as Services Australia,
- Other health-related service providers (e.g. if you were referred to us by another health care professional),
- The funder of your healthcare services such as your private health insurance provider and Medicare,
- Intermediaries who provide private health insurance information and services on behalf of our health insurance businesses, and
- Recruitment agencies when appointing employees and contractors.

With your consent, we may also collect and use your personal and sensitive information including health information for marketing purposes. For example, for the direct marketing of products, promotions and services by any and all of our private health insurance businesses and health services businesses.

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 your spouse or partner, dependants, or persons for whom you are a carer), 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 sensitive information including health information, you must first obtain the individual's consent to disclosing the information to us (unless the individual is incapable of providing such consent).

By providing your personal and sensitive information (which includes health information), or the same information relating to your spouse/partner, and/or dependant children (if applicable), you consent to, and warrant that, you have obtained their consent for GMHBA to collect, use, and disclose your and their personal information (including sensitive and health information), however collected by us, and for whatever purpose, in accordance with this privacy policy.

4. Collection of information via our digital platforms

When you visit our digital platforms, such as our website, member area and mobile app, information about your device is automatically recorded. 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, and third parties we work with, may also use cookies, tracking pixels, tags and similar technologies (together, 'tracking technologies') on our website, member area and mobile app. A cookie is a small file that allows us to identify your device. We may use this information to improve and personalise your experience when using our digital platforms. A tracking pixel is a small piece of code that allows a third-party platform such as an advertising or analytics provider to record that your device visited a particular page or took a particular action (such as requesting a quote or completing a purchase) and to send that information back to the platform. You can configure your browser or device so that it does not accept cookies, however this may minimise our ability to provide you with customised information and some parts of our digital platforms may not function as intended.

We use a number of third-party tools to collect general information about how people use our website, member area and mobile app, including session-related information. This information is aggregated and doesn't reveal to GMHBA personally identifiable information about anyone who uses our digital platforms.

We work with analytics, advertising and marketing platforms which use tracking technologies on our website to measure the effectiveness of our advertising and marketing, attribute conversions such as quotes, sign-ups and purchases to a particular campaign, and to show you more relevant ads, including by identifying you as having previously visited our website. These technologies may collect information such as your IP address, device and browser information, the pages you visit and actions you take on our website, which may be linked to an identifier assigned to your device or browser by the relevant platform. The relevant platform may combine this information with other information it holds about you which may allow it to identify you.

We provide information about the tracking technologies used across our digital platforms, including the information they collect, how that information is used or disclosed, and the choices available to you. This information is provided through a banner displayed on our website. Where we collect sensitive information, we will ask for your consent before digital tracking technologies are used. The specific tracking technologies we use may change from time to time. Further details can be found in the Terms of Use on the GMHBA website or mobile app.

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

GMHBA collects, holds, uses and discloses your personal information to provide you with products and services, including private health insurance, health-related care, health and wellness related services and partner offerings and products, 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,
  - your health care services; 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 and recommend other services you may derive a health benefit from and to facilitate the provision of such services,
- Assist us to have an integrated view of our customers 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 meet those needs through chronic disease management programs, health management programs and coaching programs or services,
- Provide you with the opportunity to participate in or attend health seminars and community health events,
- Provide you with information about, and promotions for, other products, services and programs offered by GMHBA (including other GMHBA businesses) or other service providers who have a relationship with us,
- Provide you with access to health and wellbeing programs,
- Conduct customer surveys including satisfaction and net promoter surveys,
- Conduct marketing, research and analysis and statistical analysis,
- Provide you with access to digital services such as online member area, online booking systems, webchat functionality and mobile app,
- 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 Services Australia,
- All our private health insurance businesses and health services businesses,
- 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 any of our health services practices for the purposes of improving the quality of care provided for health services 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 services businesses,
- 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 personnel,
- Organisations that facilitate the sending of emails and SMS, and
- Organisations that perform any of our other functions and activities relating to our business.

6. To whom we disclose your personal information

GMHBA will not disclose your personal details for any purpose that is not related to your relationship with us.

GMHBA may be required to disclose your personal information to comply with law, including the Private Health Insurance Act 2007 (Cth) and the National Health Act 1953 (Cth).

We may also 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 and health services businesses, contracted services providers (such as mail houses and data processing organisations), government authorities (such as Services Australia and, for Overseas Visitors Health Insurance, the Department of Home Affairs), hospitals, medical and general treatment providers, persons authorised by you (such as your nominated client authority or power of attorney) and our professional advisors, our partners in providing the Mobile App (Fusion) and online booking facility (MyHealth1st) as well as to financial institutions to process payments.

If you are a spouse or partner, or dependant child, covered by a couples, single parent or family health insurance policy (as applicable), GMHBA may also disclose your personal information (including sensitive and health information) to the policy holder as part of administering the policy and paying benefits. This may include access to and the disclosure of your personal and sensitive information, such as your health insurance claims information, including through our online member area and mobile app.

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

GMHBA Health Insurance

You can request to access or update your personal information by:

- **Emailing** service@gmhba.com.au
- **Visiting** www.gmhba.com.au & updating via the online member area or webchat
- **Calling** 1300 446 422
- **Visiting** a branch

Frank Health Insurance

You can request to access or update your personal information by:

- **Emailing** frank@frankhealthinsurance.com.au
- **Visiting** www.frankhealthinsurance.com.au & updating via the online member area or webchat
- **Calling** 1300 437 265

Frank Overseas Visitor Health Cover

You can request to access or update your personal information by:

- **Emailing** frank@frankaustralia.com.au
- **Visiting** www.frankaustralia.com.au & updating via the online member area or webchat
- **Calling** +61 03 5202 8770

7.2 Health Services Business

You can also request to access personal information, including clinical and health-related records, we hold about you by contacting our Privacy Officer (whose details are provided in Part 8 of this policy). GMHBA will allow you to access personal information we hold about you as required by law.

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.

GMHBA Care Coordination Service

- **Ph**: 1300 426 668
  Email: ccs@gmhba.com.au
  Mail: PO Box 761 Geelong 3220

GMHBA Eye Care

- **Ballarat - Ph:** 03 5326 0100
  Email: ballarateyecare@gmhba.com.au
  Mail: 208 Sturt Street, Ballarat VIC 3350
- **Geelong -** See GMHBA Hub Geelong
  Email: geelongeyecare@gmhba.com.au
- **Leopold - Ph:** 03 5297 3700
  Email: leopoldeyecare@gmhba.com.au
  Mail: Gateway Plaza, Leopold VIC 3224
- **Waurn Ponds - Ph:** 03 5210 8200
  Email: waurnpondseyecare@gmhba.com.au
  Mail: Waurn Ponds Shopping Centre, Corner Colac Road & Pioneer Road, Waurn Ponds VIC 3216

GMHBA Dental Care

- **Portland - Ph:** 03 5523 1485
  Email: portlanddentalcare@gmhba.com.au
  Mail: 47 Henty Street, Portland VIC 3305
- **Geelong -** See GMHBA Hub Geelong
  Email: geelongdentalcare@gmhba.com.au
- **Belmont -** See GMHBA Hub Belmont

GMHBA Physiotherapy

- **Geelong -** See GMHBA Hub Geelong
  Email: geelongphysiotherapy@gmhba.com.au
- **Belmont -** See GMHBA Hub Belmont
- **Lara** - See Lara Medical Centre
- **Grovedale** - See South Barwon Medical Centre

GMHBA Hub Belmont

- **Ph:** 03 5297 3725
  Email: hub.belmont@gmhba.com.au
  Mail: 157B High Street, Belmont VIC 3216

GMHBA Hub Geelong

- **Ph:** 03 5292 4080
  Email: hub.geelong@gmhba.com.au
  Mail: 60 Moorabool Street, Geelong VIC 3220

GMHBA Medical

- **Belmont -** See GMHBA Hub Belmont
- **Geelong** - See GMHBA Hub Geelong
- **Grovedale** - See South Barwon Medical Centre

Lara Medical Centre

- **Ph:** 03 5282 1926
  Email: laramedicalcentre@gmhba.com.au
  Mail: 1 Patullos Road, Lara, VIC 3212

South Barwon Medical Centre

- **Ph:** 03 5243 1111
  Email: southbarwonmedical@gmhba.com.au
  Mail: 3/284 Torquay Road, Grovedale, VIC 3216

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, please:

Contact a GMHBA representative

You can talk to a representative by visiting a branch, calling 1300 446 422, emailing service@gmhba.com.au or visiting www.gmhba.com.au and webchat.

Contact our Member Resolution Lead

The Member Resolution Lead will acknowledge your correspondence within 5 working days of receiving it. 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 Member Resolution Lead GMHBA

- PO Box 761 Geelong VIC 3220
- Or send an email to service@gmhba.com.au addressed to the Member Resolution Lead

Contact our Privacy Officer

The Privacy Officer will try to acknowledge your correspondence within 5 working days of receiving it. We will try to 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

- PO Box 761, Geelong VIC 3220
- Or send an email to service@gmhba.com.au addressed to the Privacy Officer

It is our intention to use our best endeavours to resolve any privacy related complaint to your satisfaction. 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. If your privacy complaint relates to the provision of a health service, you can also contact the Victorian Health Complaint Commissioner at www.hcc.vic.gov.au who may investigate your complaint further.

9. Transfer of information outside Australia

9.1 Health Insurance & Health Services Businesses (excludes OVHC)

From time to time, we may disclose your personal information to organisations located outside of Australia in the ordinary course of everyday business (for example, organisations that host data processing capabilities in 'The Cloud' or facilitate the sending of emails and SMS). If we do so, we will take reasonable steps to ensure the overseas organisations comply with Australian privacy laws.

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

- United States,
- Canada,
- European Union,
- China, and
- Malaysia.

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, and
- Our agents and brokers.

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:

- Verification procedures to identify an individual before access is allowed for personal information,
- Confidentiality obligations/agreements with all employees, agents, brokers and sub-contractors,
- The use of data encryption, firewalls and other security systems for our IT platforms, 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.

12. Use of de-identified and aggregated information

Where possible, we aim to use de-identified or aggregated information, rather than information that identifies you for analytics, research, reporting, actuarial analysis and business intelligence purposes.

13. Direct Marketing

From time to time, and with your consent, we may use your personal and sensitive information to contact you to provide you with information about promotions, products and services offered by us, including our private health insurance businesses and GMHBA Health Services businesses, or other service providers who have a relationship with us, that we consider may be of interest to you and your family. This includes information about GMHBA Health Services and using your claims history to identify products and services that may help improve your health and wellbeing. When we contact you, it may be via mail, phone, email and/or SMS.

If you do not wish to receive marketing material from us, you can let us know at any time by unsubscribing using the link included in our marketing materials or by contacting us using the relevant contact details in Section 7 of this Privacy Policy.

Please note that if you are a patient of multiple GMHBA Health Services, and do not wish to receive direct marketing from any GMHBA Health Service, you will need to contact each relevant GMHBA Health Service to opt-out.

If you request not to receive marketing material, please note that we will still contact you in relation to our ongoing relationship with you. For example, we will still send you billing notices, reminder notices, statements and appointment reminders.

14. Use of artificial intelligence and automated decision-making

We use computer programs (including automated systems, tools that incorporate artificial intelligence and algorithms) to make or assist with decisions using your personal information that we have collected in accordance with this privacy policy.

14.1 Private health insurance businesses

The personal information we may use in automated decision-making relating to our private health insurance businesses includes your, or any person on the policy's, date of birth, address, marital status, income, claims history and policy details such as membership number, level of cover, effective date of cover and waiting periods served.

The kinds of decisions made solely by computer programs using your personal information without being reviewed by a person before taking effect include:

- The premium quote given and premiums to be charged to you (using information such as date of birth and income to apply age-based discounts and legislative rebate tiers),
- Hospital cover eligibility determinations (using information such as level of cover and waiting periods served),

- General treatment on-the-spot card claiming payments (using information such as level of cover, waiting periods served and previous claims history), and
- The generation of a personalised recommendation or comparison of our health insurance products that may suit you on our website or the website of our brokers (using information such as your demographic information, household and family composition and your stated needs and preferences such as your budget and the type of cover you are looking for).

The kinds of decisions made with the assistance of a computer program using your personal information but where a person reviews the output before a final decision is made include:

- Finalising membership applications made via online joining (using information such as name, date of birth and address),
- Processing manual claims submitted through our member area, mobile app, email or post (using information such as name, waiting periods served and previous claims history to determine benefit eligibility),
- Prioritising and targeting direct marketing (using information such as level of cover and claims history),
- Flagging hospital, medical and ancillary claims, providers or members for review or audit, for potential fraudulent or erroneous membership and claim activity (using information such as your demographic information, product and policy information and your claims history),
- Prioritising members considered to be at higher risk of cancelling their membership for retention contact (using information such as your demographic information, product and policy information and your membership and interaction history), and
- Identifying members who may be eligible to participate in certain programs and services (such as our Care Coordination Service) based on their claiming activity (using information such as your claims history and the type of claims you have made).

14.2 Health services businesses

The personal information we may use in automated decision-making relating to our health services businesses includes your medical history, immunisation records, diagnostic imaging results, ethnicity, age and appointment, recall and patient activity history.

The kinds of decisions made with the assistance of a computer program using your personal information but where a person reviews the output before a final decision is made include:

- Comparing your diagnostic imaging results against a reference database to assist our healthcare practitioners in analysing your results and identifying findings that may need further attention (using information such as your diagnostic imaging results and, in some cases, your ethnicity and age), and
- Identifying immunisations, treatments, care plans, health assessments, screenings or other services that may be due or appropriate for you, and identifying billing or item optimisation opportunities (using information from our practice management systems such as your medical history, immunisation records, clinical data and billing, appointment, recall and patient activity history), including through point-of-care prompts to your treating healthcare practitioner.

All clinical decisions about your diagnosis and treatment remain those of your treating healthcare practitioner.

Our health services businesses may separately use clinical transcription or scribing tools to assist practitioners in preparing consultation notes during an appointment. These tools support note-taking rather than making or informing a decision about you.

14.3 Personnel

The personal information we may use in automated decision-making relating to our employees and contractors includes records of their coaching and development conversations with their manager.

The kinds of decisions made with the assistance of a computer program using the above personal information, but where a person reviews the output before a final decision is made, includes using tools that analyse coaching and development conversations between personnel and their manager to identify behavioural patterns and generate suggested coaching plans and actions based on these patterns. These suggestions are discussed collaboratively with employees and contractors and the relevant manager, with agreed outcomes used to support coaching and development conversations.

If you have any questions about our use of artificial intelligence or automated tools, or if you would like more information about a decision that has affected you, please contact us using the details set out above.

15. 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.

16. Changes to this privacy policy

We may change this privacy policy from time to time, including as our products, services, technology and business practices evolve. We recommend that you review the privacy collection statement that is relevant to your membership brand and/or the health-related business where you are a patient and this privacy policy from time to time, including to stay up to date with how we collect, hold, use and disclose your personal information as our business changes.