

# Health Insurance Privacy Statement

GMHBA Limited

# Privacy Statement

## GMHBA Limited

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

GMHBA Limited includes all health insurance businesses including our brands – GMHBA Health Insurance and Frank Health Insurance (includes Frank Overseas Visitor Health Cover), and its health services businesses including GMHBA Eye Care, GMHBA Dental Care, GMHBA Care Co-ordination Service, South Barwon Medical Centre, Lara Medical Centre, Geelong Physiotherapy and GMHBA Hub (which includes sister sites for South Barwon Medical Centre, Geelong Physiotherapy and GMHBA Dental Care).

## What is personal information?

In this privacy statement '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.

Personal information includes 'sensitive information' (which 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) and 'health information' (which includes sensitive information and information or an opinion 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). In this privacy statement, a reference to personal information includes sensitive information and health information.

## How do we collect your personal information?

Personal information collected by GMHBA Health Insurance 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 premium by payroll deduction, we may also collect your employer's details. Sensitive information including health information collected by GMHBA Health Insurance includes information about your health or medical history.

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: make an application for insurance, submit a claim, have customer interactions with us where we record system notes and voice recordings of telephone conversations or if you use our digital platforms.

With your consent, if you contact us to enquire about our products and services via our online services and any other communication channel, we may use your personal and sensitive information including health information to contact you for the purposes of providing you with further information and to follow up whether you have any interest in acquiring products and services from us.

You can let us know at any time via the contact details included in this privacy statement if you no longer wish to be contacted for these purposes. Your consent will remain current until you advise us otherwise.

Where you have provided us with personal information about other individuals (such as other any other persons on your membership, dependants, or persons for whom you are a carer), you must ensure that they are aware or will be aware of your provision of their personal information to us and how their personal information will be handled by us.

If the information you are providing to us is sensitive information including health information you must first obtain their consent before providing their information to us (unless the individual is incapable of providing such consent).

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 to process your 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 to provide you with private health insurance cover and pay you benefits,
- Organisations engaged by GMHBA Health Insurance to carry out functions on our behalf such as mail and data processing,
- Intermediaries who provide private health insurance information and services on behalf of GMHBA Health Insurance,
- Other private health insurance providers and Medicare, and
- Recruitment Agencies when appointing employees and contractors

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’](#)

We may also collect information from our digital platforms such as:

- Our website, member portal and mobile app, information about your device is automatically recorded,
- Your IP Address, top level domain name, the date and time of your visit to our site,

- The pages you have accessed or downloaded,
- The address of the last site you visited, and
- Your operating system and the browser you used.

This information is collected for statistical and administrative purposes, and to improve 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. 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. Further details can be found in the Terms of Use on the GMHBA website or mobile app. When you use our digital services or ask for general information, we may deal with you without requiring you to provide personal information. If you choose not to provide us with personal information that we request of you, 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.

### **For what purposes do we collect, hold, use and disclose your personal information?**

GMHBA Health Insurance 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 and health and wellness related services,
- Administer, process and audit private health insurance claims and pay private health insurance benefits,
- Process payments in respect of your premiums and claims,
- Contact you in relation to any matter relating to you or the health care service or products provided to you,

- Assess your suitability for, enrol you in and administer health and wellness related services such as chronic disease management programs, health management programs and coaching programs,
- Provide you with the opportunity to participate in or attend health seminars and community health events,
- 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,
- Conduct customer surveys including satisfaction and net promoter surveys,
- Conduct marketing, research and analysis and statistical analysis,
- 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 the health and wellbeing program,
- Provide you with access to digital services such as online member area, online booking systems and webchat functionality,
- Manage, review, develop and improve our private health insurance products and related services (including health and wellness services) whether provided by us or other parties, and
- Pay a commission to a broker.

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

- All our private health insurance businesses and health services businesses,
- Government and regulatory bodies such as Medicare,
- Resolve any legal and/or commercial complaints or issues including in relation to compensation recovery,
- Auditors and other services providers who we may appoint to ensure integrity of our operations and services,
- Meet legislative requirements relating to private health insurers,
- Recruit and train our personnel,
- Organisations that facilitate the sending of emails and SMS,

- 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, and
- Organisations that perform any of our other functions and activities relating to our business.

### **Who do we disclose your personal information to?**

GMHBA Health Insurance 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 'For what purposes do we collect, hold, use and disclose your personal information?' to our health insurance businesses, our strategic partner of the health and wellbeing program (AIA Vitality Australia), health services businesses, contracted services providers (such as mail houses and data processing organisations), government authorities (such as Medicare Australia), hospitals, medical and general treatment providers, persons authorised by you and our professional advisors, as well as to financial institutions to process payments.

If you are not the policy holder of your health insurance membership, GMHBA Health Insurance 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 information including 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.

## How to access and correct 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.

You can request to update your personal information by calling us on 1300 446 422, visiting a branch or online at [www.gmhba.com.au](http://www.gmhba.com.au) via the self-service member centre.

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

Further information about how you may seek to access and/or correct your personal information held by GMHBA Health Insurance can be found in the GMHBA Limited Privacy Policy (which you can access as described in the 'How to access our Privacy Policy' section).

## How to contact us or make a privacy complaint?

If you have any queries, concerns or complaints about the manner in which your personal information has been collected or handled by GMHBA Health Insurance, please refer to the GMHBA Limited Privacy Policy (which you can access as described in the 'How to access our Privacy Policy' section).

## Does your personal information get transferred outside of Australia?

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 (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

This list is updated from time to time. You can visit our Privacy Policy at any time to view the latest version.

## Direct marketing and your privacy

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 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 by:

**Email:** [service@gmhba.com.au](mailto:service@gmhba.com.au)

**GMHBA on-line member areas:** updating your contact preferences.

**Web chat:** via the GMHBA Health Insurance website.

**Mail:** GMHBA Health Insurance, PO Box 761 Geelong 3220.

**Calling:** 1300 446 422

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, statements, appointment reminders and notices. We will also communicate with you in relation to the transactions you have with fund.

## 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.

## How to access our Privacy Policy?

To access our Privacy Policy, visit [www.gmhba.com.au/privacy](http://www.gmhba.com.au/privacy), visit a branch or call us on 1300 446 422. This privacy statement may change every so often. We recommended that you review our privacy statement and Privacy Policy from time to time.

### GMHBA Branch locations

#### **Geelong Westfield**

95 Malop Street, Geelong, VIC 3220

#### **Waurnd Ponds**

Waurnd Ponds Shopping Centre, Cnr Colac & Pioneer Rds, Waurnd Ponds VIC 3216

#### **Ballarat**

208 Sturt Street, Ballarat, VIC 3350

#### **Bendigo**

Shop 11a Fountain Court, Mitchell Street, Bendigo VIC 3550

#### **Leopold**

Gateway Plaza, Leopold, VIC 3224

#### **Portland**

112a Percy Street, Portland VIC 3224

#### **Warrnambool**

114 Lava Street, Warrnambool VIC 328