

Privacy Policy

GMHBA Limited

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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 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.

'**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.

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.

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, have customer interactions with us where we record system notes and voice recordings of telephone conversations or if you use our digital platforms.

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 to carry out functions on our behalf such as mail and data processing,
- Other health related service providers for our health services businesses,
- Other health related services such as your health care service provider (e.g. if you were referred to us by another health care professional), 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 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, 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).

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 information (and sensitive information including health information) to GMHBA, or you, or your spouse/partner and/or dependant children (if any), providing your spouse/partner's and/or dependant children's personal information (and sensitive information including health information) to GMHBA for whatever purpose,

you consent to and warrant that your spouse/partner and/or dependant children have consented to, GMHBA collecting, using and disclosing your and/or their personal information (and sensitive information including health information), however collected by us, 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 portal 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 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 or device 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 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 Medicare,
- 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 Medicare Australia and, for Overseas Visitors Health Insurance, the Department of Immigration and Border 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, 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 not the policy holder of your health insurance membership, GMHBA 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.

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 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

7.2 Health Services Business

GMHBA Eye Care Practices

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

- **Emailing** eyecare@gmhba.com.au
- **Calling or visiting** us at one of the locations 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 access or update your personal information by:

- **Emailing** dentalcare@gmhba.com.au
- **Calling or visiting** us at one of the locations 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 access or update your personal information by:

- **Emailing** ccs@gmhba.com.au
- **Visiting** www.gmhba.com.au
- **Calling** 1300 426 668

South Barwon Medical Centre

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

- **Emailing** sbmc@sbmc.net.au
- **Calling** 5243 1111

Lara Medical Centre

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

- **Emailing** jy@laramedical.com.au
- **Calling** 5282 1926

Geelong Physiotherapy

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

- **Emailing** reception@geelongphysiotherapy.com.au
- **Visiting** www.geelongphysiotherapy.com.au
- **Calling** 5224 2223

GMHBA Hub

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

- **Emailing** hub.belmont@gmhba.com.au
- **Calling** 03 5297 3725
- **Visiting** 157B High Street Belmont Victoria 3216

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.

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 Customer Resolution Manager

The Customer Resolution Manager will try to 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 endeavour to provide you with a response in a timely manner.

The Customer Resolution Manager GMHBA

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

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.

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

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

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. 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, 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 contact us to let us know by:

GMHBA and Frank Private Health Insurance

Email: service@gmhba.com.au

Webchat via www.gmhba.com.au

Calling: 1300 446 422

Mail: GMHBA Limited, PO Box 761 Geelong 3220

GMHBA Eye Care Practices

Email: eyecare@gmhba.com.au

Calling: Your local health care practice listed in this policy

Mail: Eye Care, PO Box 761 Geelong 3220

GMHBA Dental Care Practices

Email: dentalcare@gmhba.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 426 668

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: laramedicalcentre@gmhba.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

GMHBA Hub

Ph: 03 5297 3725

Email: hub.belmont@gmhba.com.au

Mail: 157B High Street Belmont Victoria 3216

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 on-going relationship with you. For example, we will still send you billing notices, reminder notices, statements and appointment reminders.

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. 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/or the health-related business where you are a patient and this privacy policy from time to time.