

PRIVACY POLICY

Updated: July 2019

Endorsed by the Board: August 2019

This document outlines Peoplecare's Privacy Policy. It applies to the Board of Directors and all employees of Peoplecare and is available to anyone who requests it. This policy is an important part of our compliance with the Private Health Insurance Industry Code of Conduct.

Privacy laws

We comply with the requirements of the Privacy Act 1988 (Cth) ("the Act"), as updated from time to time, including the Privacy Amendment (Enhancing Privacy Protection) Act 2012, and the Privacy Amendment (Notifiable Data Breaches) Act 2017, as well as other state and territory laws including the Health Records and Information Privacy Act 2002 (NSW).

The core requirements of the Act are set out in the Australian Privacy Principles ("APPs"). The APPs set out how we should collect, use, keep secure and disclose personal information. The APPs also give you the right to know what information we have about you and the right to correct it if it's wrong.

Application of this Policy

We're committed to complying with our obligations under privacy law, while noting that in respect of anonymity Peoplecare would be limited in what information it can provide. This document sets out our policy for handling the personal information we collect from members, customers, business partners, related companies and contracted health service providers, including personal information for contributors of the National Health Benefits Fund Pty Ltd (Onemedifund) and members of the Reserve Bank Health Society Limited (RBHS) for which Peoplecare is the contracted outsourced administrative service provider. We may update this document if there's a change in the services we offer and, if this happens, we'll publish all changes on our website (peoplecare.com.au).

This policy outlines the obligations of Peoplecare to collect, use and disclose your personal information in the appropriate manner.

What information does Peoplecare collect?

Peoplecare collects information which is classified under the Act as 'personal information' and 'sensitive information.'

'Personal Information' is any information from which your identity can be ascertained. We only collect information that is needed to provide our services. 'Sensitive information' includes health information such as information about your health, your wishes about future provision of health services, the health service provided to you and genetic information that is collected.

Unless otherwise stated, a reference to 'personal information' includes a reference to sensitive information.

We may collect the following types of personal information:

- your name
- mailing or street address
- email address
- telephone contact numbers (e.g. home, work, mobile)
- banking details
- age or date of birth
- information related to a claim (including medical and hospital history and claims information)
- information about your health and health interests

- any additional information relating to you that you provide to us directly through our websites or mobile App's; and
- information you provide to us through customer surveys or online contacts.

By joining Peoplecare you confirm that you and other members covered under the policy have consented to us collecting, using and disclosing your and their personal (including sensitive) information in accordance with this privacy policy. We will always try to collect information directly from you however there are instances where we need to collect information from other individuals or entities.

In most cases, we collect personal information directly from you. If you are a part of a family or couples health insurance, we may collect information about you from another person on the policy. An example of this is collecting information from the person who establishes the policy. If you are adding other individuals to the same policy and provide us with their personal information, then you warrant that:

- You are authorised to act on their behalf;
- You have advised the individual that you have provided us with their information;
- You have advised them of their obligations and rights under this privacy policy and where to access this privacy policy;
- You have advised them that they have a right to access their information; and
- You acknowledge that we act in reliance of these warranties.

We may also collect information from a contracted health service provider. Contracted health service providers are required to obtain your consent before providing us with your personal information.

In the course of us providing services for other health insurers, we may also collect information from those health insurers (and their employees, officers, contractors and insured persons).

Use of cookies

The Peoplecare website may use cookies to improve its functionality. When a person visits the website, details about the visit, such as time and date, pages accessed, duration of visit and type of browser may be recorded. This information is collected for statistical purposes and can also identify a person individually.

If you do not wish to receive cookies, you can change your browser settings to refuse cookies or to notify you each time a cookie is sent to your computer and give you the choice whether to accept it.

How do we collect your personal information?

We collect your personal information directly from you in most cases, where reasonable and practicable, and with your consent including:

- through your access and use of our website and/or mobile app;
- when you, or a hospital or health provider you are using, submits a claim or seeks benefit eligibility details or a benefit quote from us;
- during conversations and correspondence between you and our representatives;
- when you complete a membership or other forms;
- when the law requires.

Why does Peoplecare collect and use this information?

We collect and use personal information for a number of reasons, including:

- Processing of and benefit payments for Hospital, Medical and Extras claims, including seeking additional information as required from hospital, medical and extra's service providers for claims assessing and audit purposes. This may involve a third party, chosen by Peoplecare, where necessary for assessing, auditing and processing claims.
- Offering extra health services through a contracted provider, where we have your consent or if we're reasonably expected to do so (for example, identifying a member who would benefit from health risk

and disease management programs and referring them to the programs). You can opt-out of receiving this information at any time by emailing info@peoplecare.com.au or calling 1800 808 690

- Billing members and customers for goods & services provided by us
- Internal operations, like planning, product development, research and reporting
- Research activities, completed by Peoplecare or contracted by third parties
- Advising members of new products and other information by newsletter, mail, email and/or mobile app. You can opt-out of receiving this information at any time by emailing info@peoplecare.com.au, unsubscribing directly from the email, or calling 1800 808 690
- Providing offers of products and services provided by Peoplecare (or partner organisations) that members may be interested in
- Allowing us to comply with statutory & legislative reporting requirements for the collection and submission of health-related data to Commonwealth agencies. For members admitted to hospital, this is done through our contracted third party - Australian Health Services Alliance (www.ahsa.com.au).
- Allowing us to comply with our obligations under service agreements entered into with other health funds where we are providing services to assist the health fund administer its business.

Do we use your personal information for marketing?

We may send you details of products, services or promotions unless you have indicated that you do not wish to receive such material. You may opt out of receiving any marketing material by writing to us, sending us an email, phoning us during business hours.

You can contact our Privacy Officer on the contact details at the end of this privacy policy. We do not sell your personal information to any other person or entity for marketing purposes.

Are we likely to disclose your personal information to overseas recipients?

- No, we are not likely to transfer your personal information to overseas recipients. However, there may be occasions where we are required to do so in order to provide you with our products or services, or manage our relationship with you.
- If we transfer your personal information outside Australia, we will comply with the requirements of the Privacy Act which relate to trans-border data flows.

Disclosure of personal information

While using your information for the above reasons, we may need to disclose personal information to persons or organisations including:

- The Australian Tax Office
- Banking & financial institutions
- Other health insurance organisations
- Contracted service providers
- Contracted third parties
- Business partners and related organisations.

We will not provide your sensitive information, including health information, to another individual, including the person named as policy holder in respect of your policy without your consent to do so. We will however provide any claims payments and general policy information to the policy holder.

The policy holder will be responsible for:

- Making claims for payments;
- Amending the type and level of cover;
- Amending details under the policy;

- Removing or adding persons or terminating the policy; or
- Allowing another to be an authorised person under the policy which allows them to be responsible for the above items.

You acknowledge that the policy holder will receive the above information on your behalf and is authorised to do the above matters on your behalf.

When we provide your information to another organisation, we'll make sure that they comply with the same Australian Privacy Principles ("APPs") when dealing with your information.

Bodies we may share your personal information with:

- Contracted service providers:
 - hospital contracting services
 - electronic claiming services
 - data housing services (within Australia)
 - outsourced print & mail services
 - claims management services
 - health service providers
 - research service providers
- Hospitals
- Peoplecare's Medical Director.
- As the outsourced administrative service provider for the National Health Benefits Fund (Onemedifund), we may disclose contributor details of Onemedifund contributors and other individuals whose personal information is collected in relation to the services offered by Onemedifund, to the National Health Benefits Fund Pty Ltd.
- As the outsourced administrative service provider for the Reserve Bank Health Society (RBHS), Peoplecare may disclose personal information of RBHS members and other individuals whose personal information is collected in relation to the services offered by RBHS, to the Reserve Bank Health Society Limited.

We need to provide the above bodies with your personal and sensitive information to enable us to fulfil our obligations as service provider so that they can in turn to provide you with health insurance and other benefits.

For a copy of the Privacy Policy of any of these bodies, email info@peoplecare.com.au or call 1800 808 690.

How does Peoplecare protect your personal information?

We do everything we can to protect the personal information we hold. Among other things, we use secure information technology techniques like firewalls, encryption and password protection. We also destroy or de-identify any personal information received from a consumer who doesn't become a member of Peoplecare.

Internally, we restrict access to personal information to employees or parties who need access to the information to do their jobs. These employees and parties are limited and committed to maintaining confidentiality. When we deal with members, we'll make sure to confirm your identity before personal information is disclosed or discussed.

How can you help protect your information?

If you provide personal information to or receive information from Peoplecare, we ask you to make sure that it's accurate, complete and up-to-date.

How can you access, correct and update your information?

You can view your personal information at any time (subject to the Act) and tell us if you believe the information is incorrect using the contact details below.

Links to other websites

Our website, mobile app and online services may contain links to third party website. Whilst Peoplecare will do its best to ensure those sites comply with the Australian Privacy Principles, this cannot be guaranteed. Caution should always be used.

What to do if you have a complaint?

If you have a complaint about a possible breach of privacy by Peoplecare, we can be contacted by:

Post: Attn: The Privacy Officer
Peoplecare
Locked Bag 33
Wollongong NSW 2500

Call: 1800 808 690

Email: info@peoplecare.com.au

Web: peoplecare.com.au

For independent advice about privacy issues, the Office of Australian Information Commissioner can be contacted by:

Post: Office of the Australian Information Commissioner
GPO Box 5218
SYDNEY NSW 2001

Call: 1300 363 992