

Privacy Policy

Updated: June 2024

This document outlines Peoplecare's Privacy Policy. This document sets out our policy for handling the personal information we collect from current and past:

- Members and customers
- Business partners
- Related companies; and
- Contracted health service providers, including personal information for contributors of the National Health Benefits Fund Pty Ltd (Onemedifund), members of the Reserve Bank Health Society Limited (RBHS) and members of AWP Australia Pty Ltd (Allianz Care) for which Peoplecare is contracted to provide administrative services.

This policy is an important part of our compliance with the *Private Health Insurance Industry Code of Conduct*.

1. 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)* and relevant standards including the *Payment Card Industry Data Security Standard*.

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.

2. 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 or services it can provide. 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.

3. 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'.

Depending on our relationship with you, the types of personal information we may collect from you includes:

- Identifying information such as your name and date of birth.
- Contact information such as mailing or street address, email address, telephone contact numbers (e.g. home, work, mobile).
- Financial information such as banking details.
- Government identifiers including Medicare number.
- Sensitive information, including:
 - Information related to a claim (including medical and hospital history and claims information).
 - Information about your health and health interests.
 - Health information provided or assessed through a visit to Peoplecare Optical and Dental.
- Any additional information relating to you that you provide to us directly through our websites or mobile app.
- Information you provide to us through customer surveys or online contacts.
- Information from your usage of our website and apps as outlined under **Use of cookies** below and Peoplecare's Term of Use (<https://www.peoplecare.com.au/help-centre/policies/terms-of-use/>).

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).

3.1. 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. For further information, please visit Peoplecare's Term of Use (<https://www.peoplecare.com.au/help-centre/policies/terms-of-use/>).

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.

4. 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 including when you start to complete (or do complete) a quote for a product we offer.
- When you submit a claim, seek benefit eligibility details or a benefit quote from us.
- During conversations and correspondence between you and our representatives.
- When you complete and submit membership and other forms.
- When you visit premises from which we operate (including through CCTV cameras in operation at our offices).
- When you participate in any of our research or marketing initiatives (including competitions and surveys).
- When the law requires.

We may also collect your personal information from a third party and this will vary depending on the nature of our interaction with you. Third parties include:

- Health service providers such as hospitals, medical practitioners or allied health professionals.
- Any person who acts as an authorised person on your behalf.
- Another insured person on your policy (refer to **Information handled between Peoplecare and the Policy Holder** for further information).
- Other health insurers.
- Brokers/intermediaries.
- Service providers engaged by us to assist in providing goods or services.
- Government agencies.

5. Why does Peoplecare collect, hold 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.
- Providing requested dental and optical services.
- Billing members and customers for goods & services provided by us.
- Managing our relationship with you, including for identifying and communicating with you.
- Internal operations, like planning, product development, research and reporting.
- Research activities, completed by Peoplecare or contracted by third parties.
- Investigating, preventing and pursuing fraudulent activities.
- Advising you of products and other information by phone, 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.
- Managing and resolving complaints or issues.
- Allowing us to comply with statutory & legislative reporting requirements including 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.
- Perform other functions and activities relating to our business.

6. Disclosure of Personal Information

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

- Hospitals and health service providers whom you have or intend to seek treatment from.
- Government agencies including The Australian Tax Office, Medicare, Commonwealth Ombudsman, the Department of Health and APRA.
- Banking & financial institutions.
- Other private health insurance organisations.
- Any person who acts as an authorised person on your behalf.
- Other persons covered under the same policy as part of administering the policy and paying benefits.
- Contracted service providers, including for:
 - Hospital contracting services.
 - Electronic claiming services.
 - Data housing services (within Australia).
 - Outsourced print & mail services.
 - Claims management services.
 - Health service providers.
 - Research service providers.
- Peoplecare's medical advisors.
- Contracted third parties including suppliers, providers or subcontractors (as necessary to enable them to provide Peoplecare's services).
- Business partners and related organisations.
- Other parties to whom we are authorised or required by law to disclose information to.

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.

6.1. Disclosure of personal information as outsourced administration service provider

Peoplecare is the outsourced administrative service provider for the below organisations, and may disclose personal information about their members/contributors and other individuals whose personal information is collected in relation to the services offered by the organisation, to the organisation:

- National Health Benefits Australia (operating as "onemedifund")
- Reserve Bank Health Society

- Allianz Partners

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.

6.2. 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 unsubscribing from the communications, writing to us, sending us an email or 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.

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

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.

7. How does Peoplecare protect your personal information?

Peoplecare undertakes a range of physical, electronic and other security measures to protect your personal information which we hold. For example we:

- Develop, implement and periodically review information security policies and procedures, which detail how Personally Identifiable Information (PII) should be handled.
- Limit access to PII and implementing authentication and authorisation protocols.
- Implement encryption technologies to secure PII.
- Undertake periodic audits and vulnerability assessments to identify and address potential security weaknesses and threats.
- Undertake periodic privacy and information security training.
- Regularly assess our practices and security measures against industry best practices.

8. Information Handled Between Peoplecare and the Policy Holder

The policy holder will be responsible for managing the below for all other persons covered under a policy:

- 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.

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.

If you, or someone on your policy does not wish for your information to be shared with other policy holders you can opt-out of this by contacting Peoplecare.

8.1. 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.

8.2. How can you access, correct and update your information?

You have a right to request access to your personal information and to request its correction. 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 Peoplecare's contact details below.

9. 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.

10. 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