

Privacy Policy Statement

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hif

Your health
Your choice



HIF Privacy Policy

HIF recognises the importance of keeping the personal information that our members entrust to us private and confidential. This Policy Statement has been compiled to outline how this personal information is collected, used and/or disclosed and the steps taken by HIF to ensure its privacy, security and accuracy.

What is Privacy?

From the 12th March 2014, private sector organisations are required to comply with the Australian Privacy Principles set out in the Privacy Act 1988 (as amended). The principles provide a regulatory framework for the collection, use, storage, security or disclosure of personal and sensitive information. Individuals have the right to know what information an organisation holds about them and to have information that is incorrect amended.

What is personal information?

Personal information is information or an opinion about an individual, or an individual that is reasonably identifiable, whether the information or opinion is true or not, or is recorded in a material form or not. Sensitive information is personal information such as racial or ethnic origin, criminal record, religious belief, political opinion, affiliation or sexual preference, and includes your health information (e.g. information about your current or future health status or conditions).

HIF will not collect sensitive information unless the individual has consented and it is reasonably necessary for one or more of our functions, or where it is required by law and in compliance with Australian Privacy Principle 3.

What kind of personal information do we collect and hold?

HIF will collect information that is required to establish and maintain HIF memberships (including the processing of claims) and any other purposes to which an individual consents. HIF will collect information in a fair, lawful and not unreasonably intrusive manner.

The types of information we may collect and hold include contact information (such as name, email address and mobile phone number), Commonwealth identifiers (such as Medicare numbers), financial information (such as credit card details), and historical information (such as previous claims). We may also collect and hold sensitive information, including information about your health and medical history, where this directly relates to our primary purpose of managing your policy or paying your claim.

HIF may collect personal information directly from an individual (by way of our website, email, telephone call or face-to-face).

HIF may also collect information from third parties, such as medical and ancillary providers, other external providers that relate to the ongoing management of a member's membership and to facilitate the payment of claims, or your previous health insurer.

HIF will, where practicable, collect personal information directly from individuals and take reasonable steps to ensure the individual is aware of:

- HIF's identity and how to contact it;
- The fact that the individual is able to gain access to the information;
- The purposes for which the information is collected;
- The main consequences (if any) for the individual if the information is not collected; and
- The obligations under the HIF Privacy Policy.

By becoming or remaining a member of one of our policies or by otherwise providing personal (including sensitive) information to us, you confirm that you have consented to us collecting, using and disclosing your personal (including sensitive) information in accordance with HIF's Privacy Policy. This extends to other members covered under your policy.

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For what purposes do we use or disclose your personal information?

HIF will only use or disclose personal information for purposes for which the individual consents, that is consistent with the individual's reasonable expectations and HIF's Constitution, or is required or authorised by law and in compliance with Australian Privacy Principle 6.

HIF outsources various services associated with the delivery of health insurance. Therefore information collected by HIF may be disclosed to a third party or authorised Government Agency to deliver services associated with a member's membership. This includes health service providers, regulatory bodies, financial services partners, data scanning and other IT service providers, or professional advisors. Where HIF does disclose personal information, it is administered in a way consistent with our obligations under this Privacy Policy. Members may allow other people of their choosing to access their personal information through the completion of a Spousal or Agent's Authority.

HIF may use your personal information to contact you in relation to other HIF products or services we think may be of interest to you, including competitions and events HIF organises from time-to-time.

HIF will not permit a third party to use or disclose an individual's personal information for direct marketing purposes.

You may opt-out of receiving marketing information from HIF at any time by:

- Calling us on 1300 13 40 60
- Emailing us at info@hif.com.au or
- Logging into your online member services tool on our website.

What happens if you don't provide us with your personal information?

If you don't provide us with personal information we request, we may be unable to provide you with products or services you request of HIF, or pay your claims in accordance with your policy.

Data Quality

HIF will take all reasonable steps to make sure to the best of its ability that personal information it collects, uses or discloses is accurate, complete and up-to-date.

Data Security

HIF will take all reasonable steps to protect the personal information it holds from misuse, loss, unauthorised access, modification or disclosure.

HIF will also take all reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used or disclosed under Australian Privacy Principle 10.

Openness

The HIF Privacy Policy will be available to anyone upon request. When requested, HIF will confirm or advise individuals what information is being collected about them. HIF will take reasonable steps to ensure individuals are generally aware of the purpose for which the information is being collected and who can have access to the information. HIF will be open with individuals about what personal information it holds and what HIF does with such information.

Government Identifiers

HIF will only collect, utilise or disclose Commonwealth Government identifiers such as your Medicare number in a way that is consistent with its original purpose and will not adopt as its own identifier an identifier of an individual that has been assigned by the Commonwealth Government or any of its service provider agencies.

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Anonymity and Pseudonymity

Individuals have the option of not identifying themselves when contacting HIF for general information or identifying themselves by way of a pseudonym.

General information is classified as non-membership specific information, such as whether or not a certain hospital is contracted to HIF or whether or not VitalOptions cover Optical.

If an individual seeks information other than general information (such as when seeking membership), it may be impractical to interact anonymously or pseudonymously, in which case the individual must identify themselves.

Cross-border disclosure of personal information

In general, HIF will not disclose your personal information to an individual or entity that is not in Australia.

If you take out travel insurance, HIF may transfer your personal information overseas where this directly relates to your travel insurance policy (such as to an overseas health service provider), in the country to which you are travelling to, or are travelling in.

If you take out private health insurance, at your request HIF may provide a transfer certificate that includes your personal (including sensitive) information (such as your claims history) to an overseas insurer nominated by you. In this case, you consent to HIF disclosing this information to an overseas person or entity.

HIF will only transfer information about an individual to someone in an overseas country if HIF reasonably believes that the recipient of the information is subject to a law, scheme or contract which effectively upholds principles that are substantially similar to the Australian Privacy Principles, the individual consents to the transfer or the transfer will otherwise be in compliance with National Privacy Principle 8.

Access and correction of personal information

Upon written request, HIF will provide a copy of personal information it holds relating to an individual, except to the extent that:

- In the case of personal information other than health information, providing access would pose a serious and imminent threat to the life or health of any person(s); or
- In the case of health information, providing access would pose a serious threat to the life or health of any person(s); or
- Providing access would have an unreasonable impact upon the privacy of another person(s); or
- The request for access is frivolous or vexatious; or
- The information relates to existing or anticipated legal proceedings between the organisation and the individual, and the information would not be accessible by the process of discovery in those proceedings, or providing access would reveal the intentions of the organisation in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
- Providing access would be unlawful; or
- Denying access is required or authorised by or under a law; or
- Providing access would be likely to prejudice an investigation of possible unlawful activity; or
- Providing access would be likely to prejudice:
 - The prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law; or
 - The enforcement of laws relating to the confiscation of the proceeds of crime; or
 - The protection of the public revenue; or
 - The prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct; or
 - The preparation for, or conduct of, proceedings before any court or tribunal, or implementation of its orders; by or on behalf of an enforcement body; or
 - An enforcement body performing a lawful security function requests or requires HIF not to provide access to the information on the basis that providing access would be likely to cause damage to the security of Australia.

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If an individual is able to establish that information collected about that individual is incorrect, HIF will take reasonable steps to correct it. If HIF corrects the individual's information, HIF will take reasonable steps to notify any health service provider to whom HIF has disclosed the health information before its correction and who may reasonably be expected to rely on the information in the future.

HIF will provide reasons for denial of access or a refusal to correct information.

Process for providing access to personal information

- All requests from a HIF member for access to personal information relating to that membership must be in writing.
- The Application to Access Information Form must be provided to the member.
- All completed Application forms to access information are referred to the Privacy Officer for risk assessment and referred to appropriate Executive Manager as required. All completed applications are to be referred to the CEO with the risk assessment of the Privacy Officer.
- Applications for access to personal information will be acknowledged within 7 days, and the applicant advised of the decision regarding access within 14 days. Fees for access as detailed below are charged and advised to the applicant at this time. A deposit may be required, and all fees must be paid at time of access. If fees have not been paid, access should be denied until payment in full is received and credited to HIF.
- There are certain circumstances where fees may be reduced and/or waived. Extenuating circumstances shall be referred to the Managing Director for his/her consideration by the Privacy Officer.
- The Privacy Act provides exceptions where access to information may be withheld. The Managing Director must make decisions in respect of these exceptions. The applicant will be sent a notice giving reasons for the decision and advising of review rights where access is denied.

- All successful applicants must provide appropriate identification as listed in the Access Brochure prior to accessing the information.
- Copies of information can be supplied when requested on the application form.
- Only the Privacy Officer or the Managing Director must supervise all access.

Fees and Charges

The Privacy Act and regulations provide for a reasonable scale of fees to be paid by an applicant. The fees are:

- \$30 per hour for the time taken to find the information;
- \$30 per hour for supervising the inspection of any material to which access is given;
- 20c per page for photocopying of A4 pages (non-coloured);
- \$15 per page for supplying written transcripts;
- Other reasonable costs i.e. postage.

The maximum charge for personal information is \$150.

Process for requesting a correction to personal information

The Privacy Act permits individuals to correct the information held concerning them. A request to correct information must:

- Be in writing;
- Give an address for notice;
- Give details of the information that the individual believes is incorrect, incomplete, out of date or misleading; and
- Specify the amendment(s) requested.

Requests to correct information will be reviewed by the Privacy Officer and referred to the appropriate Executive member. All requests for corrections are to be referred to the Managing Director. HIF may decide to:

- Correct the information as requested;
- Permit a notation to existing information; or
- Deny the request.

Individuals must be advised of HIF's decision within 28 days of the request, together with advice as to the individual's review rights.

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Process to appeal, enquire or complain

Appeals/enquiries/complaints may arise in the following circumstances:

- When an individual alleges a breach of the Australian Privacy Principles has occurred;
- When the fee charged for provision of the information is disputed;
- When refusal to grant access to all or part of the information occurs;
- When refusal to correct personal information occurs.

Stage 1

An internal review is conducted by HIF's Managing Director.

Stage 2

Utilisation of an intermediary. The intermediary's role is to act as a facilitator with the aim of providing sufficient access to meet the needs of both parties. The intermediary is a person whom is acceptable to both parties. Consent is required to allow disclosure of information to the intermediary.

Stage 3

If the matter remains unresolved, then the individual may seek an external review by the Australian Information Commissioner.



Request for Access to Personal Information

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Requests for Information under Subpoena

HIF must comply with requests for access to records under court order or subpoena. Upon service of a subpoena the records should be forwarded under adequate security to the Registrar of the court in question. 'Adequate security' involves hand delivery of records to the court where possible or production of the records by courier or security officer.

Under some circumstances, and with the approval of the Court in question, photocopies of records may be produced under subpoena, with HIF retaining the original.

A search and production fee should be raised for production of records under subpoena. This should be sent to the solicitor who requested the Court to issue the subpoena. In the case of subpoenas issued by the Police, an invoice will not be raised as this information is provided free of charge.

Any request under subpoena should be brought to the attention of the Managing Director.

Request for Information under Search Warrant

The law requires compliance with a search warrant. Any such official demand for data should be immediately brought to the attention of the Managing Director.

Request for Information from the Police

Requests for access to information by a member of a Police force in Australia shall be denied unless the Police produce a search or general warrant empowering access to the information sought by law, or otherwise pursuant to a court order. Police access to records as above must be complied with and must be brought to the attention of the Managing Director.

Requests for Information from HIF's Insurer or Solicitor

All requests for access to records by HIF's insurer or solicitor should be referred to the Managing Director. In such cases the Managing Director may determine that the consent of the member is not necessary, however, information not relevant to the case being investigated should not be disclosed. Any communication between HIF and its solicitor is privileged (i.e. disclosure cannot be accessed by any person or court) and is deemed to occur for the purpose of obtaining legal advice.

Requests for Information from the Media

All requests for information or interviews by the media should be directed to the Managing Director. No information is to be released to the media without the consent of the member, (or parent or guardian of the member) concerned.

Hospitals/Ancillary Service Providers

Information will only be supplied to Hospitals and Ancillary Service Providers when it relates to the verification of membership and eligibility to claim a service.

Requests for Information from Relatives, Friends or Others

When dealing with requests for information by relatives, friends or others, no information shall be released without the member's written consent. This includes the fact that the person is/was a member.

Compulsory Release of Information - Legislative Requests

HIF is also required to observe the requirements of the following legislation (where applicable):

Commonwealth legislation:

- The Health Insurance Act 1975 (as amended)
- The National Health Act 1953 (as amended)
- The Private Health Insurance Incentives Act 1998 (as amended)

All requests, orders, directions pursuant to the above under legislation should be referred to the Managing Director.

Costs of Releasing Information

All costs incurred in releasing information (i.e. photocopying etc) are at the expense of the member/requestor (e.g. solicitor). A fee should be charged when producing records under subpoena, except in the case of answering subpoenas from the Police.

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Sending Information by Fax

Facsimile machines present unique opportunities for the rapid transmission of information. However, information sent by fax is vulnerable to interception by non-authorized individuals. For this reason, confidential records should only be faxed from one institution to another in exceptional circumstances. The sender is responsible for ensuring the security of the information, while the receiving institution must guarantee the confidentiality and security of the information once received. The receiver should acknowledge receipt of the information by telephone. Information sent by fax should be addressed to the specific requestor and sent to a specific or identified area within the receiving institution.

Information about the use of HIF's Website and Electronic Transactions

You are not required to provide HIF with any personal information when visiting our website, unless you are completing a formal application or membership change request, making changes to your own health cover details within the Member Centre area of the website or sending us an "online" information request. When you visit HIF's website, or download information from it, our Internet Service Provider makes a record of your visit and may record your internet address, domain name, date and time of your visit to the website you have visited and the type of Internet browser you are using. This information is not identifiable or attributable to an individual and is used only for statistical and website development purposes.

Address for Requests for Personal Information

The Privacy Officer

HIF

GPO Box X2221

PERTH WA 6847

Privacy Commissioner

If HIF cannot agreeably resolve your privacy concerns you may contact the Australian Information Commissioner in writing:

Office of the Australian Information Commissioner

GPO Box 5218

SYDNEY NSW 2001



At HIF we're all
about choice.

Call, email or contact us

GPO Box X2221 Perth WA 6000



As Australia's first certified
Carbon Neutral health fund.

The information in this brochure was correct on the 1st of May 2013. Minor changes may have occurred since that date. If major changes occur, the brochure will be reprinted. Details of minor changes can be obtained from the Fund or downloaded from hif.com.au. This brochure supersedes all previous brochure information.