

# Privacy Policy

This privacy policy covers the HCF Group and includes The Hospitals Contribution Fund of Australia Limited, HCF Life Insurance Company Pty Limited, Manchester Unity Australia Ltd and other related body corporates.

The HCF Group is committed to best practice privacy protection. We will do our best to protect your personal information from the moment you share it with us.

We also observe our obligations under the:

Privacy Act 1988 (Cth); other relevant State legislation dealing with privacy and health records; and Spam Act 2003 (Cth); as amended from time to time.

# HCF Group Privacy Policy

## 1. What sort of personal information does the HCF Group collect?

### a) Primary purpose of collection

#### i) Information in relation to health and life insurance cover and services

The HCF Group only collects information that is relevant to the insurance cover or services you ask for. The sort of information we need includes: name, residential, postal and email addresses and other contact details, your family/single status, date of birth, medical history and associated social and lifestyle information. We also collect claims information that you provide us with from time to time.

The information collected cannot be used in determining your rate of health insurance premium, except in accordance with the Private Health Insurance Act.

#### ii) Additional information in relation to life insurance cover and services

We may need to collect additional information if you ask for life insurance. We may ask you about your type of employment, financial reports and previous insurance history.

#### iii) Information in relation to retirement and aged care services

The HCF Group only collects your personal information to provide retirement or aged care services and related products to you.

### b) Secondary purposes

Any personal information we collect can be used for what is called a secondary purpose, meaning a purpose other than the original one. For example, we may use the information you have already given us to provide you with further health services. We would only use and/or disclose this information in such a situation if you would reasonably expect us to do so or if we have your permission. When dealing with particularly sensitive information, such as your claims history, the secondary purpose must be directly related to the primary purpose.

## 2. What happens if you don't give the HCF Group this information?

It is your right not to give us any information. However, if you choose not to give us the personal information we need, we may not be able to

- a) consider your application for insurance
- b) administer your policy or provide you with relevant health services
- c) manage or pay any claims you make under your policy
- d) provide you with relevant retirement and aged care services.

## 3. How does the HCF Group collect your personal information?

We collect the personal information you give us:

- electronically including through our website;
- during phone calls;
- whilst visiting our branches, Dental or Eyecare Centres;
- whilst delivering and administering services at our retirement or aged care facilities; or
- from forms, claims and other correspondence, in writing or electronically.

Sometimes we may need to collect sensitive information from third parties such as doctors or hospitals so we can assess or process claims. We may also need to ask for information from another health insurer, if you have transferred your membership. Under some circumstances, the HCF Group may contact a service provider who has treated you in the past, if the information would be relevant to your policy.

## 4. How does the HCF Group use your personal information?

### a) Insurance and Retirement and Aged Care Services

Your personal information is collected so that we can comply with laws, manage our relationship with you, record your treatment, provide health insurance and related products and services to you, investigate and act on fraudulent or improper claims, assess your insurance, health and related lifestyle needs, develop products and services that may better serve those needs, provide you with retirement or aged care services, and assess your possible interest in such products and services.

### b) Developing programs for the benefit of members with health insurance

From the personal information that we collect from our members in providing health insurance, we are able to develop programs that are intended for the benefit of members. In some instances, participation in these programs is offered to all members. In other instances, the invitation to participate is targeted at specific members who are most likely to benefit from participation in the programs.

Where the program is designed to assist members generally, we will inform members via a general communication of the availability of the program, for example, via the web site or through the HCF Group publications or advertisements, and invite them to participate in the program by opting in to the program.

Where the program is designed to assist members with specific illnesses and conditions we will offer those members the choice of opting in to participate in the program.

In relation to all programs:

- Participation is entirely voluntary;
- Participation or non-participation will not affect your claims benefits or premiums or your client relationship in any way; and
- If you do not wish to participate in a program after you are invited to join, you may decline the invitation or may, at any time, withdraw from any program in which you may have been enrolled.

If you do not wish to be contacted regarding participation in any programs developed by us, you may ask for your name to be added to a “no contact” list. Members on this “no contact” list will not be invited to join any programs developed by us for the benefit of members.

## 5. Does the HCF Group disclose information to third parties?

At the HCF Group we recognise the trust you place in us when you provide personal information. We will not sell or rent your information in any circumstances. We may share or disclose your personal information to third parties, including to organisations that deliver services on our behalf or to us, government agencies, health service providers (where it is used to improve their ability to provide you with health services), research companies contracted to the HCF Group (to ask your opinions on improving the Group’s service, benefits or product offerings), mailing houses, and other health insurers and law enforcement agencies in cases of suspected fraud. In some situations we may have to disclose necessary, relevant and appropriate information to satisfy legal obligations.

Organisations that deliver services on our behalf or to us may require your personal information for accounting and auditing purposes, claims assessment and processing or providing other services and products.

The programs that we develop for the benefit of members are frequently administered by third party service providers. In order for them to administer these programs it may be necessary for us to disclose your personal information to them.

These organisations and third party service providers are under contractual obligations not to disclose your personal information and to use that information solely to deliver services on our behalf, and not to use it to offer other services to members of the HCF Group.

At the conclusion of the program the service provider is required to return that information to the HCF Group or destroy any personal information about the member provided by the HCF Group. If you choose to participate in a program, these third party service providers may collect personal information, including sensitive information from you. That personal information is not disclosed to the HCF Group, except as permitted under the Privacy Act. For example, this may include information for conducting clinical audits and for billing purposes.

Through the conduct of our business, we collect and use information that may include personal information about providers and their charges, and we may publish some or all of this information on our website or communicate it to our members in other ways, as a service to our members.

We do not normally give personal information about you to anyone who is not on your membership. You will need to give us written permission if you want someone who is not covered by your membership, such as a friend or carer, to deal with the HCF Group on your behalf.

Our privacy obligations extend to everyone who is covered by your policy, including partners and children. However, our contract with the contributor requires us to have full and free communication with the contributor on all aspects of the policy, including the benefits claimed under the policy.

We send all communications on policies that cover more than one person to the address supplied by the contributor. Everyone who is covered by the policy should be made aware of this.

## 6. Is the information that the HCF Group holds about me accurate?

The HCF Group takes reasonable steps to ensure that the information we hold about you is accurate when we use it or disclose it. You should contact us if you think your personal information is wrong. If you need to update your contact details, you can do so through the members’ section of our website at [www.manchesterunity.com.au](http://www.manchesterunity.com.au).

## 7. Can anyone outside the HCF Group access my information?

We have put in place safeguards to protect the personal information we hold from misuse, loss and unauthorised access, modification or disclosure. We destroy or permanently de-identify personal information we no longer need, wherever possible.

In the case of clinical information collected in our Dental Centres, your information will be held for at least seven years from the last time a health service was provided. If someone under the age of 18 used the health service, the information will be held at least until that person has turned 25.

We do not transfer personal information to any other jurisdiction unless it is in accordance with Australian privacy laws.

## 8. How is information from the HCF Group websites collected and used?

The HCF Group collects information when you:

- Complete an online form;
- Give us your email address; or
- Access and use any of our services through our website.

We collect data from our website to help us understand which are the most popular pages and when the peak usage times are, along with other information that helps us improve the content and make the navigation easier.

When you visit our website, it will send a cookie to your computer. This is a small piece of information stored on your hard drive which tells us that your computer has accessed our website. The cookie will not identify you unless you've already given us personal information such as your name and email address.

If you do not want to use cookies, you can set your browser to reject them.

## 9. What about linked websites?

We provide links to third party sites. Since we do not control these websites, we encourage you to review the privacy policies posted on these third party sites. The HCF Group is not responsible for any practices on linked websites that might breach your privacy.

## 10. How to access your personal information

If you have a question about this Privacy Policy or want to access your personal information you can contact us:

- At any HCF branch
- Phone 13 13 72
- Write to:  
The HCF Group Privacy/Compliance Officer  
Level 6  
403 George St  
Sydney NSW 2000

A request for access needs to include a full description of the personal information requested. If making a request in person, you will be asked for two forms of identification, one of which must have a photograph on it. If you request information over the phone, we will ask you identity-related questions so we can verify you. Your request for privacy information will be documented, as will details of the request and the identity of the person who gave it to you.

You will not be charged for accessing your information, although we might have to charge the reasonable cost of processing your request, including photocopying, copying of radiographs, supplying written reports, administration and postage.

## 11. How the HCF Group will respond to your request

The HCF Group will respond within 48 hours of receiving your request. We will do our best to deal with your request within 5 working days.

If we cannot help with your request, you will receive a written explanation as to why.

## 12. Need further information?

For more information about privacy in general, you can visit the Privacy Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au).

## 13. Do you want to contact the HCF Group anonymously?

You can certainly contact the HCF Group anonymously. If you choose not to be identified, however, we are limited in our ability to insure you, pay your claims or offer you services.

## 14. Can you complain about a breach of privacy?

If you want to complain about a privacy breach, you can visit any HCF branch, call 13 13 72 or email [info@manchesterunity.com.au](mailto:info@manchesterunity.com.au). We will do our best to resolve your complaint as quickly as possible.

If you are not satisfied with the result of your complaint to the HCF Group, you can refer your complaint to the Federal Privacy Commissioner by phoning 1300 363 992, or writing to:

Director of Complaints  
Office of the Federal Privacy Commissioner  
GPO Box 5218  
Sydney NSW 1042

# HCF Group Privacy Policy

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## 15. The HCF Group Spam Policy

Nobody wants to receive spam. That's why the HCF Group has put a robust anti-spam policy in place, and why we fulfil our obligations under the Spam Act 2003 (Cth) at all times.

The HCF Group has created internal policies and procedures to educate its staff on the Spam Act legislation. We have developed clear guidelines and rules about the dissemination of commercial electronic messages, which we enforce.

We will use your personal information to send you commercial electronic messages in accordance with the terms of this privacy policy unless you unsubscribe. You can unsubscribe from our mailing list at any time. To unsubscribe, simply email us at [info@manchesterunity.com.au](mailto:info@manchesterunity.com.au) and advise us of your wish to unsubscribe. Otherwise, call 13 13 72 and speak to our Spam Policy Administrator (the HCF Group Privacy/Compliance Manager). We will arrange for your details to be removed.

## 16. Help stamp out spam

To help the HCF Group combat spam, please do the following:

If you receive an offensive message that seems to come from a HCF Group email address, please assume it has been sent in error.

Notify us immediately.

Please ensure that you unsubscribe from the HCF Group mailing lists if you do not want to receive commercial messages from the HCF Group.

If you do subscribe to an HCF Group mailing list, please ensure that we have your current details at all times.

Update us on any changes to your email address.

## 17. Updating our Privacy Policy

The HCF Group may review, amend or revise its Privacy Policy and the way it handles personal information from time to time. Such changes will be consistent with current privacy legislation. We will post the updated Privacy Policy on our website at [www.manchesterunity.com.au](http://www.manchesterunity.com.au).

Last update: June 2010

# HCF Group

## More than a health insurer.

- ✓ We employ hundreds of health professionals – dentists, optometrists, nurses and health coaches, to better care for your health.
- ✓ Our 7 HCF Dental and Eyecare Centres in Sydney offer many fully covered services and products, saving you money.
- ✓ Our unique My Health Guardian program helps improve your health.
- ✓ HCF Life offers you affordable ways to get financial help when sickness, accidents or unemployment strike.



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The Hospitals Contribution Fund of Australia Limited. ABN 68 000 026 746  
HCF Life Insurance Company Pty Limited. ABN 37 001 831 250  
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