

1. Policy Statement

At Teachers Federation Health Ltd ABN 86 097 030 414 trading as Teachers Health Fund (THF), we recognise the importance of privacy. We observe the privacy obligations under the Privacy Act 1988 (Cth) and other relevant state legislations dealing with privacy and health records, as amended from time to time. The Privacy Act provides for the protection of an individual's personal and sensitive information.

THF has a policy for the management of personal information as set out in this document. This policy will be reviewed on a regular basis (usually biennially) or more frequently in the event of material changes (e.g. legislative, regulatory and best practice etc).

In 2012, the Privacy Act was amended to introduce new Australian Privacy Principles (APPs). APP 1 requires organisations to have a clearly expressed and up to date privacy policy, containing certain requirements, which are addressed in this policy.

2. What kinds of personal information does THF collect?

From time to time, THF may collect personal information about a member such as name, date of birth, family members, contact details, claims history, income tier and information regarding products and services members inquire about or obtain through THF so that it can provide insurance cover or other services such as eye care or dental care. THF may also collect personal information about a prospective member such as name and contact details so that it can discuss providing health insurance cover to that prospective member.

THF may also collect bank account details and information in respect of insurance policies in order to provide members with its services.

THF may collect sensitive information such as a member's medical procedures, hospital attendances and the provision of ancillary health services, medical history or other health or lifestyle information, or information regarding a membership of a trade union - in order to provide its health insurance services and other services.

THF may collect details of a member's union membership including a union membership number and the status of membership - to assess whether a member is eligible for membership of THF.

3. How THF collects personal information

(a) Directly

THF may collect personal information from a member if the member:

- gives it to THF directly by visiting the member care centres or health centres, provides information by phone or provides information in writing such as by completing THF forms;
- uses THF products and services;

- visits the website at teachershealth.com.au or any other website operated by, or on behalf of, THF; or
- uses the online or mobile member services.

THF may also collect personal information from a prospective member from its business development officers visiting educational facilities and events from aggregators, business partners or from member referrals.

(b) Indirectly

THF may collect personal information from third parties in some situations:

- it may be supplied with members personal information from third parties such as from THF partner organisations such as trade unions, employer organisations, aggregators, hospitals, Medicare, medical and ancillary providers and financial institutions;
- if a member/ customer transfers health insurance to THF from a previous service provider, it may require personal information from the previous service provider; and
- it may collect some sensitive information about members, such as medical information, from third parties such as hospitals, doctors, dentists, optometrists, or other ancillary providers.

4. Cookies & other technologies

THF's website, online services, interactive applications, email messages and advertisements may use "cookies" and other technologies such as pixel tags and web beacons. THF may use these technologies:

- to better understand user behaviour, by telling THF which parts of THF's website people have visited and to facilitate and measure the effectiveness of advertisements and web searches; and
- to remember personal information when an individual uses THF's website, online and mobile services and applications.

Individuals can disable their web browser from accepting cookies. Certain features of the THF website will not be available to an individual once cookies are disabled.

As is true of most websites, THF gathers some information automatically and stores it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit pages, operating system, date/time stamp and clickstream data.

THF uses this information to understand and analyse trends, to administer its website, to learn about user behaviour on the site and to gather demographic information about its user base as a whole. THF may use this information in its marketing and advertising services.

In some of its email messages, THF uses a "click-through URL" linked to content on the THF website. When customers click one of these URLs, they pass through a separate web server

before arriving at the destination page on our website. THF tracks this click-through data to help it determine interest in particular topics and measure the effectiveness of our customer communications.

Pixel tags enable THF to send email messages in a format customers can read and they tell THF whether mail has been opened. THF may use this information to reduce or eliminate messages sent to customers.

5. How does THF hold personal information?

Personal information collected by THF is generally entered into and held in a centralised digital secure repository.

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

THF will ensure that appropriate technical and organisational security measures, consistent with standard industry practice, are in place to attempt to safeguard the security and confidentiality of the personal information it collects. Because of the nature of the internet, however, THF does not guarantee that the website or the online and mobile member services are totally protected from hackers or misuse and it will not be responsible for any breach of security caused by third parties. THF does not use any form of encryption (encoding software) to protect information a member sends from their computer to THF over the internet through the use of feedback, enquiry and appointment forms and emails. Encryption software is applied when using online or mobile member services and joining online.

THF will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the personal information may be used or disclosed under this Privacy Policy.

6. What happens if a member does not provide THF with their personal information?

A member does not have to provide their personal information to THF. However, if they do not provide personal information which THF requests from them, THF will make them aware that it may affect THF's service to them, including:

- THF may not be able to provide insurance or administer the insurance policies;
- THF may not be able to process, manage or pay out on an insurance claim;
- THF may not be able to provide health services such as eye care and dental services;
- third party service providers such as hospitals, doctors, optometrists, dentists and other allied service providers may not be able to provide the member with services;
- THF may not be able to properly assess a member's health and lifestyle needs and consequently may not be able to provide health lifestyle or chronic disease programs; and
- members may not be able to access THF online or mobile member services.

7. Purposes for which THF collects, holds, uses and discloses personal information

THF may collect, hold, use and disclose personal information for a number of purposes such as:

- to provide health insurance and related products and services;
- to confirm eligibility to become a member;
- to respond to eligibility checks from hospitals and other medical providers;
- to pay health insurance claims;
- to manage THF's relationship with the member;
- for THF's own internal and marketing purposes;
- for the purposes related to the reason the member gave the information;
- as may be required by law;
- to provide or arrange for associated services to be provided such as dental services, eye care services, allied services such as physiotherapy or travel insurance and other insurance or health related services;
- to assess a member's general health and wellbeing needs and to continue to meet those needs; and
- to provide THF online and mobile member services.

THF develops programs and initiatives from time to time to assist members with day to day health and wellbeing issues such as diet and exercise, as well as assistance with illnesses suffered by members. Members may choose to sign up to such programs from time to time. Members are not obliged to join any such programs. If they do join any such programs, THF may use personal and sensitive information already collected from them so that they can get the most benefit from such programs. For instance, if the member suffers from diabetes and chooses to join a program that assists with their diabetes treatment, THF may use earlier personal and sensitive information collected from them in order to advise them on their treatment program.

THF may also use a member's contact details to send information about THF or its products, services or programs. If a member does not wish THF to send this information, then THF should allow the member the opportunity to tell THF when it collects the personal information. Refer to paragraph 10 of this policy for further details in relation to opting out of THF direct marketing.

8. Disclosure of personal information

THF will not sell a member's personal information to any third party. THF will not disclose any personal information about a member, except:

- to its related companies, joint venture and business partners such as dental or eye care providers, general insurance providers and providers of wellbeing and chronic disease programs;
- to its suppliers, third party service providers or subcontractors (as necessary to enable them to help provide THF's services and any member programs);
- to hospitals, healthcare providers, Medicare or other government agencies or financial institutions;
- as required by law; or

- with a member's consent.

Some of the programs that a member may join may be administered by third parties in order to provide the best service to the member. To ensure the efficient administration of such programs, THF may need to disclose a member's personal information to these third parties. THF will endeavour to ensure that third party program administrators will not disclose a member's personal information to any third parties.

If a member joins programs through THF which are administered by third parties, the member may need to disclose personal information to these third parties. The third parties do not disclose this information to THF. A member's disclosure of personal information directly to such third parties would be subject to their privacy policies.

If the THF membership policy covers the main policy holder as a main contributor and a partner or children, THF will only contact the main policy holder regarding anyone else covered on the policy.

THF is not likely to disclose personal information to overseas recipients.

9. Dealing with THF anonymously or using a pseudonym

THF permits a member to deal with THF anonymously or by using a pseudonym. If the member chooses to do so, however, THF will be limited in the products or services it is able to assist the member with.

As a general rule, THF may allow an individual to contact THF anonymously in some limited circumstances – for example to enquire generally about its goods and services, or to complete a retail transaction at a health centre by paying for goods in cash.

10. Direct marketing

A member may request not to receive direct marketing communications from THF by contacting it at unsubscribe@teachershealth.com.au or calling 1300 728 188. THF will give effect to the request as soon as reasonably practicable and, in any case, within 30 days of the request being made to THF.

11. Access to and correction of personal information

THF will take reasonable steps to ensure that all personal information it collects or uses is accurate, complete, up to date and stored in a secure environment and is accessed only by authorised personnel for permitted purposes.

If a member wishes to access or correct any personal information which THF holds about a member, or requests its removal from THF records, they should contact the THF via post, fax or email, in person at one of the member contact centres or over the phone with a member of the contact centre.

If a member requires access to their eye care records, eye test results or dental records, they may do so by contacting the eye care or dental care provider directly.

THF will respond to a member's access request as soon as practicable and, in any case, within 30 days of the request being made to THF. THF will either respond by providing the member with the access or amendments they have requested, or by providing them with the reasons for refusing to do so.

If THF refuse to amend a member's health information, the member may request that THF attach to the health information a statement of the amendment sought, and in that case, THF must take reasonable steps to do so.

In some circumstances, THF may charge a fee to cover administrative costs in respect of retrieving a member's personal information and providing it to them. THF will inform the member if there are going to be any such costs involved in retrieving their personal information.

12. Making a complaint

THF views complaints as an opportunity to maintain and enhance customer loyalty and approval and enhance its competitiveness by continuous review and improvement. THF has a Customer Complaint Handling and Dispute Resolution Policy in place for handling the complaints it receives. A copy of this policy is available to members at teachershealth.com.au.

If a member would like to make a complaint about a breach of privacy, THF will make them aware that:

(a) Complaints can be made by contacting the THF Privacy Officer at:

Email: privacyofficer@teachershealth.com.au

**Address: THF Privacy Officer
Teachers Health Fund
GPO Box 9812
SYDNEY NSW 2001**

Phone: 1300 728 188

(b) The complaint should first be made in writing. THF will respond as soon as reasonably practicable and, in any case, within 30 days. All complaints are handled in accordance with the THF Customer Complaint Handling and Dispute Resolution Policy.

(c) In the event that the complainant is not satisfied by THF's response, they may take the complaint to the Private Health Insurance Ombudsman (PHIO) in the first instance. If the complainant is still not satisfied with the outcome, then the complaint may be taken to the Office of the Australian Information Commissioner (OAIC).

(d) PHIO can be contacted on 1800 640 695 or a member can write to:

The Private Health Insurance Ombudsman
Phone: 1800 640 695
Fax: (02) 8235 8778
Email: info@phio.org.au

Suite 2, level 22, 580 George Street
SYDNEY NSW 2000

See also PHIO complaint brochure for further details:
<http://www.phio.org.au/downloads/file/PublicationItems/MakingAComplaint.pdf>

(e) OAIC can be contacted on 1300 363 992 or a member can write to:

The Office of the Australian Information Commissioner
Phone: 1300 363 992
Email: enquiries@oaic.gov.au

GPO Box 5218
Sydney, NSW 2001

See also OAIC privacy complaint brochure for further details:
<http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

13. Who this Privacy Policy does not apply to

THF will make members aware that this Privacy Policy does not apply:

- to corporate information (unless it is also about any identifiable person); or
- if a member accesses another website through a link from THF. In this case the privacy policy of the owner of the other website (if any) will apply. THF cannot and does not make any warranty or representation as to the practices of any linked websites in the handling of a member's personal information.

14. Changes to this Privacy Policy

THF may make changes to this Privacy Policy from time to time for any reason. THF will notify members of such changes by posting an updated version of this Privacy Policy on its website at teachershealth.com.au. If members use this website, they should regularly review this Privacy Policy. A members continued use of this website constitutes their agreement to any changes to this Privacy Policy.