

# Privacy Policy

## Policy Statement

This policy applies to Queensland Teachers' Union Health Fund Limited ABN 38 085 015 376 and its related entities, collectively known as TUH (also referred to as 'we' and 'us' in this document).

TUH is committed to protecting any personal information entrusted to or obtained by us.

## We will achieve our commitment by:

- Following processes for how we collect, use, store and disclose personal information that comply with this policy; and
- Complying with the Privacy Act 1988, including the Australian Privacy Principles.

The Privacy Act takes priority if there is any discrepancy between it and this policy.

## Policy Details

### What is personal information?

Personal information is any information or opinion about you that could reasonably be expected to identify you, regardless of whether the information or opinion is true, or whether it is recorded in a hard or electronic or any other material form.

Sensitive information is a subset of personal information which is subject to greater controls. It includes health information and union membership details. For the purposes of this policy, any reference to personal information includes sensitive information.

### Why do we collect and use personal information?

We collect personal information primarily to enable us to provide private health insurance benefits and health care services and programs.

For example, your personal information could be collected and used to:

- Manage your membership and our relationship with you;
- Approve claims for hospital, medical and other health services;
- Provide products and services that you have requested;
- Record details of any treatment you may receive;
- Update your payment details;
- Respond to your enquiries;
- Meet internal functions such as administration, accounting, auditing, risk management and fraud protection;
- Conduct research and analysis for product development, service improvement and marketing purposes;

- Evaluate, changing and/or developing existing or new products, benefits, services and processes;
- Inform you of products, benefits or services;
- Investigate and resolve disputes and/or complaints; and
- Comply with our legal obligations, which include providing some personal information to government agencies.

### **Direct marketing**

We will only use or disclose your personal information for direct marketing purposes about our own products and services, or those from other providers that you may reasonably expect us to communicate with you about. You may opt out of marketing communications at any time by letting us know.

### **Policy holder and membership**

The health insurance policy holder is the person in whose name the membership is held and holds the legal responsibility for the membership. We direct correspondence to the policy holder unless we are responding to a request from another person covered by that policy, or a suitable alternative authority or direction is in place.

### **What personal information do we collect?**

The personal information we collect and hold depends on the nature of the relationship we have with you and the extent to which you have used our services or made claims. Information will only be collected with your consent or as permitted by law.

The type of personal information we may collect about you may include:

- Identification details such as name, gender, marital status and date of birth;
- Contact details such as home, postal and email address and phone numbers;
- Government details such as Medicare number, tax file number and Rebate registration;
- Financial details such as bank or other financial institution account and credit card details;
- Private health insurance details such as current and past levels of cover, changes of cover, cancellations and suspensions of membership;
- Sensitive information such as health and medical details including claims and services or programs that we have provided, or you have accessed through us, and union name and union member number; and
- Browsing history if you use our website or app.

### **How do I provide consent?**

By making an enquiry about our products or services, becoming a member, patient or client, making a claim for benefits or otherwise making use of services offered by us (including where the services are provided by organisations contracted by us), you are regarded as having consented to the following:

- The collection of personal information by us, including from third parties; and
- The use and disclosure of personal information;

in accordance with this policy.

If the policy held by you includes anyone aged 18 and over, it is important that you obtain their approval to provide their personal information to us. If you provide such information we will consider that you have obtained this consent. We will also assume that you have authority to provide us with the personal information of anyone covered by the policy who is aged under 18.

### **Can I withdraw consent?**

You are entitled to withdraw consent at any time by contacting our Customer Contact Centre or our Privacy Officer.

### **Can I deal with TUH anonymously?**

You can deal with us anonymously where it is lawful and practicable to do so. For example, for quotes, some general enquiries about membership and benefits we pay for a particular procedure, there will usually be no need for you to provide your personal details.

If you withdraw your consent to collect, use, store and disclose some or all your personal information that we may need, or wish to deal with us anonymously, we may not be able to provide you with many of the benefits or services that we offer.

## **How do we collect personal information?**

Where it is reasonable and practicable to do so we will collect personal information directly from you, such as when you:

- Contact us by phone, email, online or SMS, in writing or in person;
- Respond to our direct marketing surveys or campaigns;
- Submit an application for one of our products;
- Submit a variation to the type or level of cover or persons covered;
- Lodge a claim;
- Use our website or an app we have established, including submitting an online form;
- Interact with our social media pages;
- Arrange and receive a health care service; or
- Participate in our health management programs.

We have an agreement with the Australian Health Service Alliance (AHSA) to collect your personal information, including your health information ("your information") for the purposes of providing health services to you, managing the funding of those services, or as required by law. In order to provide these services, the AHSA may use your information and/or disclose it to us or your health service provider.

AHSA's privacy policy, can be found at [www.ahsa.com.au/web/ahsa/privacy\\_policy](http://www.ahsa.com.au/web/ahsa/privacy_policy).

### **Cookies and Google Analytics**

Cookies are small pieces of data sent by your browser when you use many websites, including our website. The cookies are stored on your computer or device. They capture information, such as your viewing preferences, to make your use of the website more efficient.

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

You can choose to disable cookies through your browser settings.

We may also use Google Analytics and similar tools from other organisations such as Facebook and YouTube to better understand how our website is used. This makes information stored in server logs available to these companies. The information is aggregated and does not identify individuals.

Third party vendors, including Google, show our ads on sites across the internet. 3rd party cookies from Google and other organisations analyse website visits and provide ads based on these visits using applications that include:

- Remarketing with Google Analytics,
- Google Display Network Impression Reporting,
- DoubleClick Platform integrations, and
- Google Analytics Demographics and Interest Reporting.

You can choose not to have your information collected by Google by following this link: <https://www.google.com/intl/en/analytics/learn/privacy.html>

### **What about linked websites?**

On our website, we provide links to third party websites. Since we do not control these sites, we encourage you to review the privacy policies posted on these third-party sites. We are not responsible for any practices on linked websites that might breach your privacy.

### **Information collected from third parties**

We may collect information about you from another person or organisation. For example:

- Other individuals on your policy, e.g., a family membership;
- Your hospital or a health provider;
- Persons or organisations necessary to establish eligibility for benefits where services claimed may be paid, at least in part, from another source;
- A provider contracted by us to provide services on our behalf, including research and marketing. These services include collecting details of potential members;
- Financial institutions;
- Claiming software providers (such as HICAPS);
- Brokers and comparators (such as iSelect);
- Your employer, if you are part of a payroll deduction scheme;
- Another health insurer if you are transferring your membership; or
- Another person that you have provided authorisation to deal with us.

### **When do we disclose personal information?**

We will only disclose information to third parties when:

- You have authorised, or would reasonably expect us to provide information. For example, when providing verification of membership to a hospital or other health service provider before or after receiving treatment, when transferring between health funds, when sending claim data to Medicare for the payment of Medicare benefits, or paying claims via a facility such as HICAPS;

- Another organisation or person provides a service for, or to, us and has an agreement with us that includes confidentiality provisions. For example, software suppliers, mail houses, health providers, electronic claims facilitators, record management providers, marketing agencies and research bureaux;
- We obtain expert advice such as from medical referees, claims consultants and legal and other professional advisers;
- You receive a health care service or participate in a health program provided by a third party on our behalf;
- We use or assist service providers, other health insurers or other third parties to help us prevent and detect fraud;
- Required or as permitted by law. For example, we provide information to regulatory bodies, government enforcement agencies (including overseas), complaints adjudicators and others; or
- The safety of our members or if the safety of others in the community is at risk.

We may also disclose information to other individuals on your policy or to any person that you have authorised to act on your behalf. To act on such an authority we will need your written permission or a copy of a Power of Attorney, or similar document.

In the event of unauthorised access to, or disclosure of, your personal information, TUH has procedures in place to immediately take appropriate action including notifying you, consistent with our Privacy Act obligations.

## When do we send personal information overseas?

At times we may send your information to organisations outside Australia that we have contracted with (directly or indirectly via an Australian organisation) to provide services on our behalf. We will only do this where we are satisfied that the recipient of the information will handle and protect your information in a manner that is consistent with the Australian Privacy Principles and this Privacy Policy and:

- We have your consent; or
- We have a contractual obligation to do so or there is some other identifiable benefit to you; or
- Where we are required to by law.

We may disclose personal information to organisations or persons in the following countries: Canada, India, Japan, New Zealand, Singapore, United Kingdom and United States.

## How do we store your personal information?

We take all reasonable steps to protect your personal information from unauthorised access, misuse or disclosure.

We restrict access to personal information to authorised personnel only. Your information is kept for as long as is required to provide the requested products and services and, in some circumstances, to comply with statutory requirements. All information held by us is stored securely at our premises or at secured off-site premises.

Policies and procedures are also in place to protect personal information from misuse, loss or unauthorised access, modification or disclosure. We will ensure the ongoing

adequacy of these policies by reviewing these documents regularly and by conducting regular employee training.

## What do we do with unsolicited personal information?

If we come into possession of personal information that we did not request, we will destroy it as soon as practicable, and if lawful to do so.

## Who can access personal information?

You can generally access any of the personal information that we hold about you. We provide access via our Member Services Online facility or upon request. Also, if you are the policy holder or are authorised by the policy holder you may access:

- Personal information about any dependant aged under 18 covered by the policy; or
- Personal information of a dependant over 18 years covered by the policy if the dependant is of impaired capacity;
- Information relating to the policy such as:
  - Billing information,
  - Financial information, and
  - Benefit information.

Any dependant aged 18 years and over may access their own personal information.

Any member under a policy, including the policy holder, when accessing information via Member Services Online, may have access to limited information about other members on the policy as part of the functionality of this service. Other than in these circumstances, a policy holder does not have the right to access personal health information of other members under the policy, without a relevant power of attorney or suitable delegation document.

### Responding to an access request

We will endeavour to meet all appropriate requests for access; however, access to some information may be denied, including where:

- We no longer hold the information;
- Denying access is required or authorised by or under law;
- Providing access would have an unreasonable impact upon the privacy of other individuals;
- Providing access would pose a serious threat to the life or health of any individual;
- The request is frivolous or vexatious; and
- Access relates to existing or anticipated legal proceedings or a court order.

Our Privacy Officer will advise the reasons why we cannot give members access to the information requested.

Under current privacy laws, we have up to 14 days to respond to a written request and 30 days to grant access.

## How can you correct personal information?

We will take reasonable steps to ensure the personal information collected, used or disclosed is accurate, complete and up to date.

If you believe that your personal information is not accurate, please advise us. We will amend your records promptly unless we disagree with the change requested. If that occurs, we will explain the reason and document it on your records.

### **Is there a cost?**

There is no charge for correcting your personal information or requesting access to it. However, you may be charged a processing fee for retrieving and providing the information depending on the complexity of the request. We will advise if a charge may apply when we respond to your request.

### **How do we communicate with you?**

Where you have provided us with an email address, including by using one of our Apps, we will use that as the main method of communicating with you, unless you have nominated another preferred method. We may also contact you by phone, mail or SMS.

You can choose how we communicate with you by letting our Customer Contact Centre know.

### **Who do I contact if I want more information or to make a complaint?**

If you have a question on this Privacy Policy or would like further details of how we may collect, use, store and disclose your personal information please contact our Privacy Officer.

You should also contact our Privacy Officer if you have any concerns or a complaint about how we have handled your personal information or have complied with the Australian Privacy Principles. We will acknowledge receipt within three working days and aim to resolve any complaint as soon as possible.

### **Office of Australian Information Commissioner (OAIC)**

Further information about the Privacy Act can be found at the website of the OAIC – [www.oaic.gov.au](http://www.oaic.gov.au). You can also contact the OAIC if you are not satisfied with our response or the way we have handled your complaint.

### **Contact Details**

#### **TUH**

PO Box 265/438 St Pauls Terrace

Fortitude Valley QLD 4006

Email: [privacy.officer@tuh.com.au](mailto:privacy.officer@tuh.com.au) or [enquiries@tuh.com.au](mailto:enquiries@tuh.com.au)

Phone: 1300 360 701

#### **Office of Australian Information Commissioner**

GPO Box 5218

Sydney NSW 2001

Email:

Phone: 1300 363 992

## Updating the Privacy Policy

We will review our Privacy Policy and make updates to the policy from time to time. The latest version of the policy will be posted on our website – [www.tuh.com.au](http://www.tuh.com.au), or can be obtained by contacting us.