

Phoenix Health Fund has been proudly operating as a not-for-profit health fund for over 65 years. Owned by members, run by members, for the benefit of members; our members are at the forefront of everything we do, and we strive to provide every one of them with affordable personal health insurance and service.

At Phoenix Health we are committed to protecting and maintaining the privacy of all of our members and people who deal with us. We are also committed to complying with the *Privacy Act 1988 (Cth) (the Privacy Act)* and the *Australian Privacy Principles (APPs)*.

This policy explains how we manage any personal information which we collect, hold, use and disclose. It also explains how to contact us if you have any further queries about our management of your personal information.

This policy applies to you, and only to the extent of your personal information collected and handed by us that is subject to the *Privacy Act*.

By becoming, or remaining, a member of Phoenix Health Fund Ltd or any brand underwritten by Phoenix Health Fund Ltd, you agree to the conditions of this Privacy Policy including consenting to the collection, use and disclosure of your personal and sensitive information, and understand that you hold responsibility for the consent, collection, use and disclosure as detailed above for all persons listed on your policy as detailed in this Privacy Policy.

What is personal and sensitive information?

Personal information is any information or any opinion (regardless of its accuracy or form) about an individual from which the identity of a person is reasonably identifiable. It includes your name, age, gender & contact details, as well as your health information (which is also sensitive information for the purposes of the Privacy Act). In this policy, a reference to personal information includes sensitive information.

What kind of personal and sensitive information do we collect and hold?

Phoenix Health only collect personal information about you which is reasonably necessary for our functions or activities and can vary depending on the type of relationship you have with us.

The type of information which we collect and hold can include, but is not limited to your:

- name;
- age and date of birth;
- contact details such as your (and any other member(s) on your policy) name, phone number, residential address and email address;
- government related identifiers such as your Medicare number;
- financial information such as bank/ credit card details (either directly or through third party processors);
- historical information such as your prior insurance claims history;
- call recordings and notes taken during conversations and interactions between you and the fund;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Site, including through the use of Internet cookies, your communications with our Site, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Site, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.



Phoenix Health is committed to protecting your privacy

This Privacy Policy outlines our processes for managing your personal information. At Phoenix Health your privacy is assured.



Sharon Waterhouse
Chief Executive Officer

How do we collect your personal and sensitive information?

Phoenix Health only collect personal information about you in the manner permitted by the *Privacy Act*.

We may collect your personal information from you in a number of ways including in person, by phone, through our website or by email.

We may also collect your personal and sensitive information from:

- other members listed on your policy, or other persons who have been granted the authority to provide information on your behalf;
- third parties such as hospitals and health service providers
- organisations engaged by us to carry out functions on our behalf such as claims administration; or
- another health fund, if you are looking to transfer your membership.;

How do we collect your personal and sensitive information?

When holding your personal information, we are required by the *Privacy Act* to take reasonable steps:

- to ensure that your personal information that we collect hold, use and disclose is accurate, complete and up-to-date;
- to protect your personal information from misuse, interference and loss, as well as from unauthorised access, modification or disclosure; and
- to destroy or permanently de-identify your personal information if we no longer require that information for any purpose that is permitted by the *Privacy Act*.

For what purposes do we collect, hold and use your personal and sensitive information?

We collect, hold and use your personal information for the following purposes:

- to provide our products and services including private health insurance;
- to perform the functions and activities related to our business such as processing your claims and paying your benefits;
- in order to comply with any legislative and regulatory provisions;
- to assist members to comply with their taxation obligations;
- to investigate and resolve complaints;
- marketing initiatives;
- to maintain, manage and develop operational processes and systems;
- to develop health insurance products;
- analyse, investigate and prevent suspected fraudulent activities;
- to provide information to agents, service providers and external advisors, to deliver products and services to you; and
- to manage our relationship with you including by contacting you about products or services, news or community events which we think may be of interest to you.

Our range of products and services, as well as our functions and activities, and those of our service providers may change from time to time.

Who do we disclose your personal and sensitive information to?

In order to carry out the above mentioned purposes, we may disclose your personal information to the following persons or organisations including, but not limited to:

- health service advisors;
- our professional advisors;
- other persons covered by your membership, where they have been given authority from you;
- payment system processors;
- system and technology operation partners;
- government agencies;
- regulatory bodies;
- third parties with whom we have retained to improve membership and offerings (including Rewards programs);
- third party social media sites that provide marketing services;
- other health funds, service providers or third parties who assist in the detection and investigation of fraud;
- your employer if you have a corporate arrangement with us; or
- other parties to whom we are authorised or required by law to disclose information.

We may also disclose your personal information to the organisations, such as health service providers, from whom we collect your information.

Marketing

Phoenix Health Fund may use your personal information for marketing initiatives (including social media and Google) for the purpose of providing you with updates about Phoenix Health Fund's, and other affiliated third party, products, services and offerings.

We may use your personal information to contact you (including by phone, text message or email) about products or services which we think may be of interest to you. This may include our own, our related body corporate or third-party products or services.

In particular, we may contact you about products and services we think may be of interest to you after you cease to hold a private health insurance policy with us. For example, we might contact you about renewing your old policy or taking out a new policy.

How can you opt-out of receiving marketing material?

You may opt-out of receiving marketing information from us & our related bodies corporate by:

- calling us on 1800 028 817;
- emailing us at enquiries@phoenixhealthfund.com.au;
- 'ticking the box' on the relevant form when you apply for one of our products or services.

Please allow five working days for your request to be actioned.

What if you don't want to give us your personal information?

You're not required to give us your personal information. However, we may not be able to provide you with the products or services that you request of us. For example, it is a legislative requirement that all Private Health Insurance memberships hold a current residential address.

When you contact us, you generally have the right not to identify yourself, where it is lawful and practical for us to allow it. However, in not providing us with your personal identifying information we may not be able to assist you or aid in answering your query.

How can you access and seek correction of personal information held by us?

You can access or seek correction of your personal information by:

- calling us on **1800 028 817**;
- emailing us at **enquiries@phoenixhealthfund.com.au**;
- or by mail at **PO Box 156, Newcastle NSW 2300**

We will give you access to your personal information if practicable and will take reasonable steps to amend any personal information about you which is inaccurate or out of date.

We may refuse you access to, or we may refuse to correct, your personal information in certain circumstances permitted by the *Privacy Act*. In such a case, we will provide you with written notice of the reasons for our decision. We do not charge a fee to give you access to your personal information. However, we reserve the right to do so depending on the nature and extent of your request.



Complaint Handling

If you have any questions, concerns or complaints about how we collect or manage your personal information, then you may raise that matter with our Privacy Officer.

Our Privacy Officer can be contacted as follows:

- calling **1800 028 817**;
- emailing **enquiries@phoenixhealthfund.com.au**;
- or by mail at **PO Box 156, Newcastle NSW 2300**

We will endeavour to promptly respond to your questions, concerns or complaints. We will also endeavour to resolve any concerns or complaints which you may have to your satisfaction.

However, if you are unhappy with our response, you can complain to the Office of the Australian Information Commissioner (www.oaic.gov.au), who may investigate the complaint further.

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

No, 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.

What if you have further questions?

An up-to-date copy of our Privacy Policy will always be available at **phoenixhealthfund.com.au** or you can contact The Phoenix Health Team for a copy.

If you have any questions about our Privacy Policy, then you may contact our Privacy Officer whose contact details are listed above.

If you have questions about the Privacy Act, then you may contact the Office of the Australian Information Commission.