

## Reserve Bank Health Society Limited

# Privacy Policy

Version: May 2023

Endorsed by the Board:

The Reserve Bank Health Society Limited ("the RBHS") is subject to the *Privacy Act 1988* ("Act"), including the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*, The *Privacy Amendment (notifiable Data Breaches) Act 2017* and the *Australian Privacy Principles* ("APPs") as well as other state and territory laws including the *Health Records and Information Privacy Act 2002 (NSW)*.

The core requirements of the Act are set out in the *Australian Privacy Principles* ("APPs"), which cover how RBHS should collect, use, keep secure and disclose personal information and sensitive information. The APPs also give individuals a right to know what information the RBHS holds about them and a right to correct it if it is wrong.

### What is personal information?

'Personal information' is any information or opinion from which your identity can be ascertained.

### What is sensitive information?

'Sensitive information' includes health information such as information about your health, your wishes about future provision of health services, the health service provided to you and genetic information that is collected.

Unless otherwise stated, a reference to 'personal information' includes a reference to sensitive information.

### What personal information does the RBHS collect?

Depending on our relationship with you, the types of personal information the RBHS may collect from members of RBHS and from individuals whose personal information is collected in connection with products and services offered by RBHS or other activities of RBHS includes:

- Identifying information such as your name and date of birth
- Contact details including your residential or mailing address, telephone contact numbers and email address
- Government identifiers, including Medicare numbers

- Financial information such as your bank account details or credit card information.
- Sensitive information, including information relating to your health or health services, including details relating to any health claims
- Information about your health and health interests
- Information you provide to us through customer surveys or online contacts; and
- Information from your usage of our website and mobile app as outlined under **Use of cookies** below and the RBHS's Terms of Use (<https://www.myrbhs.com.au/help-centre/policies-and-reports/terms-of-use/>).

By joining the RBHS you confirm that you and other individuals covered under the policy have consented to us collecting, using and disclosing your and their personal information in accordance with this privacy policy.

## How does the RBHS collect personal information?

We will always try to collect personal information directly from you however there are instances where we need to collect information from other individuals or entities.

In most cases, we collect personal information directly from you. If you are a part of a family or couples health insurance, we may collect information about you from another person on the policy. An example of this is collecting information from the person who establishes the policy.

If you are adding other individuals to the same policy and provide us with their personal information, then you warrant that:

- You are authorised to act on their behalf;
- You have advised the individual that you have provided us with their information;
- You have advised them of their obligations and rights under this privacy policy and where to access this privacy policy;
- You have advised them that they have a right to access their information; and
- You acknowledge that we act in reliance of these warranties.

We may also collect information from:

- Third party service providers that are engaged by us to assist us in providing services or to administer our business. Third parties include:
  - Health service providers such as hospitals, medical practitioners or allied health professionals.
  - Any person who acts as an authorised person on your behalf.
  - Another insured person on your policy.
  - Other health insurers.
  - Service providers engaged by us to assist in providing goods or services.

- Government agencies.
- A contracted health service provider. Contracted health service providers are required to obtain your consent before providing us with your personal information.

We may collect personal information from members in various ways, including:

- When you complete and submit a membership application and/or other forms;
- Through your access and use of the RBHS website and/or mobile app;
- When you, or a hospital or health provider you are using, submits a claim or seeks benefit eligibility details or a benefit quote from us;
- During conversations between you and RBHS representatives;
- When you participate in any of our research or marketing initiatives (including competitions and surveys); or
- When the law requires.

### **What happens if you choose not to provide your personal information?**

If you do not provide the personal information requested the RBHS may be limited in its ability to interact and provide services to you including the inability to create a membership, process and pay claims and make changes to your policy.

### **Why does the RBHS collect, hold and use this personal information?**

The RBHS collects and holds, and may use your personal information to:

- Establish and maintain your membership, including to facilitate eligibility checking and payments for appropriate medical treatment for Policy Holders, identifying and communicating with you.
- Liaise with the Reserve Bank of Australia (RBA) or Note Printing Australia (NPA) in regard to payment of your premiums if required (including any reduction or increase). The RBHS will not inform the RBA or NPA of any changes to your personal information.
- Process, audit and pay claims. This may include instances where a third party is engaged to undertake services that are deemed to be an integral part of the claim assessment and processing system.
- Provide health services through a contracted provider, where the member has consented, or would reasonably expect RBHS to do so, such as identifying and referring which persons covered would benefit from risk management and disease management programs. Members can opt out of receiving this information if required by contacting the fund at [info@myrbhs.com.au](mailto:info@myrbhs.com.au) or 1800 027 299.
- Account and billing maintenance.
- Investigating, preventing and pursuing fraudulent activities.

- Manage Internal business operations such as planning, product development, research and reporting to the RBHS.
- Provide direct market offers of products and services provided by or on behalf of RBHS (or other partner organisations) which we consider may be of interest to our policy holders. You may opt out of receiving any marketing material by unsubscribing from the communications or contacting the fund at [info@myrbhs.com.au](mailto:info@myrbhs.com.au) or 1800 027 299. We do not sell your personal information to any other person or entity for any purpose.
- Comply with our legal obligations, including submission of de-identified health related data to Commonwealth agencies. For members admitted to hospital, this is done via our contracted third party, the Australian Health Services Alliance ([www.ahsa.com.au](http://www.ahsa.com.au)).
- Managing and resolving complaints or issues.
- Perform other functions and activities relating to our business.

The RBHS will not use personal information for other purposes without the consent of the individual unless the disclosure is required by law.

Personal information obtained by the RBHS through telephone interaction with you may be recorded for staff training and coaching purposes. In such cases you will be informed that the conversation will be recorded and advised of your right to cancel such recordings before proceeding. In undertaking such recordings, the RBHS will at all times comply with the *Telecommunications (Interception and Access) Act 1979 (Cth)*.

## Disclosure of Personal Information

The RBHS may also disclose your personal information to other individuals and organisations including:

- Other persons listed on your policy as part of administering the policy and paying benefits. If you, or someone on your policy, does not wish for your information not be shared with other policy holders you can opt-out of this by contacting the RBHS.
- Government agencies including the Australian Tax Office, Medicare, Commonwealth Ombudsman, the Department of Health and Aged Care and the Australian Prudential Regulation Authority.
- Banking and financial institutions.
- Other Private Health Insurers.
- Hospitals, Health service and medical providers whom you have or intend to seek treatment from.
- Contracted service providers, including:
  - Hospital contracting services
  - Electronic claiming services
  - Data housing services (within Australia)
  - Outsourced print & mail services

- Claims management services
- Health service providers
- Research service providers
- Other parties to whom we are authorised or required by law to disclose information to.
- RBHS' medical advisers.
- Peoplecare Health Limited (A.C.N 087 648 753) as the RBHS's outsourced administrative service provider.

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

The RBHS is 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 Act which relate to trans-border data flows.

## **Use of Cookies**

The RBHS website and mobile app may use tracking "cookies" to improve its functionality. When a person visits the website, details about the visit, such as time and date, pages accessed, duration of visit and type of browser may be recorded. For further information, please visit RBHS's Terms of Use (<https://www.myrbhs.com.au/help-centre/policies-and-reports/terms-of-use/>).

If you do not wish to receive cookies, you can change your browser settings to refuse cookies or to notify you each time a cookie is sent to your computer and give you the choice whether to accept it.

## **Security of Personal Information**

Hard copies of information collected are stored securely with controlled access. Access to the software used to maintain the RBHS's database is strictly controlled, and we use, among other things, secure information technology techniques like firewalls, encryption and password protection. The RBHS will regularly review who has access to ensure confidentiality is maintained.

RBHS will destroy or de-identify as soon as practicable (if it is lawful and reasonable to do so) any unsolicited personal information it receives from an individual.

## **Access and Correction of Your Personal Information**

RBHS undertakes a range of physical, electronic and other security measures to protect your personal information which we hold. For example, we:

- Develop, implement and periodically review information security policies and procedures, which detail how Personally Identifiable Information (PII) should be handled.
- Limit access to PII and implementing authentication and authorisation protocols.
- Implement encryption technologies to secure PII.
- Undertake periodic audits and vulnerability assessments to identify and address potential security weaknesses and threats.
- Undertake periodic privacy and information security training.
- Regularly assess our practices and security measures against industry best practices.

## Who To Contact

If you have a privacy issue or complaint that you wish to raise, your first step should be to contact the RBHS Privacy Officer at the following address:

The Privacy Officer  
Reserve Bank Health Society Ltd  
Locked Bag 23  
Wollongong NSW 2500

**Telephone:** 1800 027 299  
**Email:** [info@myrbhs.com.au](mailto:info@myrbhs.com.au)

If the issue is not resolved, a formal complaint may be submitted to the Chairperson of the Board, who will arrange for it to be considered promptly by the Board. Contact details for the Chairperson of the Board are:

Reserve Bank Health Society Chairperson  
Reserve Bank of Australia  
GPO Box 3947  
Sydney, NSW 2001

If you are still not satisfied you may lodge a complaint with the Private Health Insurance Ombudsman at the following address:

Commonwealth Ombudsmen  
GPO Box 442 Canberra, ACT 2601

**Telephone:** 1300 362 072  
**Email:** [phio.info@ombudsman.gov.au](mailto:phio.info@ombudsman.gov.au)  
**Web:** [www.ombudsmen.gov.au](http://www.ombudsmen.gov.au)

Independent advice about privacy issues can be obtained from the Office of the Federal Privacy Commissioner. Contact details are as follows:

Office of the Australian Information Commissioner  
GPO Box 5218  
SYDNEY NSW 2001

**Telephone:** 1300 363 992

### **Policy Availability**

A copy of this Policy is available on the website [www.myrbhs.com.au](http://www.myrbhs.com.au) or can be provided on request.