

# Collection Statement: Providers / Health Practitioners

We are HBF Health Limited ABN 11 126 884 786. At HBF, we exist to deliver for our members in the moments that matter. We achieve this by providing our members with products and services including private health insurance and health and wellness services. References to 'HBF', 'HBF Health', 'us', 'we' or 'our' refer to HBF Health Limited. HBF Group refers to HBF and its related entities.

As an Australian business, HBF is required to comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) which includes the Australian Privacy Principles. We may also be subject to state and territory health records legislation when we deal with health information.

## What is personal information?

"Personal information" is defined in the Privacy Act as information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, or is recorded in a material form or not. It includes, but is not limited to, your name, age, gender, address, contact details and sensitive information. Sensitive information includes, but is not limited to, health information, genetic information and some biometric information.

## Collection and use of your personal information

The type of personal information we collect and use depends upon your relationship with us (and our members).

If you are providing services to our members as a health practitioner or other healthcare provider, we may collect and use your personal information to:

- register you as a provider (including for provider arrangements such as medical gap or Member Plus arrangements);
- verify your identity and status as a health practitioner or other provider which may include government-issued identifiers including Medicare provider and Australian Health Practitioner numbers;
- manage our ongoing relationship with you (including if applicable to administer medical gap, Member Plus or other provider arrangements);
- provide our members, general practitioners and the general public with a HBF provider search service or a service which advertises or indicates whether you, (if you are a HBF registered medical gap provider, an ancillary provider, a HBF Member Plus Dental Provider, a HBF Optical Member Plus Provider or have a similar type of arrangement with HBF) participate in a particular arrangement with us, either on our website or on third party websites;
- conduct data analysis based on treatments performed and the associated fees and costs, and use results from our analysis of this data to measure trends, such as out of pocket (gap) expenses;

- make payments to your nominated bank account and send you remittance advices;
- permit you to access information such as remittance advices, provider registration information and communications via applications;
- obtain and record feedback from our members on the service you provide and deal with complaints;
- inform our members and prospective members that you are an HBF registered provider and whether or not you are a participant in any of our provider arrangements, including via online searches, phone, mail or email;
- understand and with your consent inform our members and the general public of your fees and costs including out of pocket costs for specific types of treatments;
- provide you with information about our processes, benefits and Fund Rules, including changes to them, subject to relevant laws;
- provide you with material, such as articles and information about provider arrangements that may be of interest to you, subject to relevant laws;
- administer, process and audit private health insurance claims;
- undertake actions to prevent, detect and follow up fraudulent or invalid claims or misrepresentations;
- conduct investigations and make determinations under our Fund Rules;
- ensure our records are consistent and accurate; and
- meet legislative requirements relating to private health insurers.

We may be required to collect personal information about you in order to comply with our obligations under the *Private Health Insurance Act 2007* (Cth) and other private health insurance laws and regulations. We may collect your personal information directly from you (when you register with us) or from third parties, such as Medicare, Australian Regional Health Group (ARHG), HICAPS and similar service providers, your practice representative or HBF members who have received services from you. If you are a medical practitioner registered with Australian Health Service Alliance Ltd (AHSa) we may collect your personal information from AHSa as we are one of their participating health funds and they administer our arrangements with hospitals and medical providers outside WA.

If you do not wish to provide the personal information HBF (or AHSa) requires for registration as a provider (including for medical gap or Member Plus arrangements) HBF (or AHSa) will not be able to register you as an HBF provider (or any applicable provider arrangement).

If you are a general practitioner, we may collect your details from HBF members that participate in member support programs.

## Disclosure of your personal information

In order to carry out the activities described in this statement, HBF may disclose your personal information to persons or organisations such as:

- other companies in HBF Group;
- other health funds and other service providers or other third parties who assist us in the prevention, detection and investigation of fraud;
- third parties for the purpose of provider registration and claims processing;
- our service providers (who may provide services directly to you or on our behalf) including mailhouses, persons conducting surveys and market research and claims administrators and other persons auditing or reviewing claims history or claiming patterns or providing IT support;
- health and wellness service providers (such as hospitals, pharmacies, general practitioners, allied health providers, and chronic disease and health management program providers), the facilitators of our arrangements with doctors, health service providers and hospitals, including AHSA;
- payment system operators and financial institutions;
- external consultants to review the claims history and claiming patterns of HBF members;
- regulatory or industry bodies (such as your professional association) and government agencies; and
- other parties to whom we are authorised or required by law to disclose information.

If you have registered with AHSA, your personal information may also be disclosed by AHSA as part of your arrangements with them.

If you are a registered medical gap provider or an ancillary provider (including a Member Plus Dental Provider, a HBF Optical Plus Provider or have a similar type of arrangement with HBF), we also disclose your personal information, including any correspondence or billing address, to the general public, to HBF members, to general practitioners and to third party website providers to provide HBF provider search services or to advertise or indicate whether you participate in a particular arrangement with us, either on our website, on a third party website, over the phone, by mail or email.

## Disclosing your information overseas

Generally, HBF uses systems and customer teams located within Australia. However, HBF may also use service providers who store personal information overseas. This means personal information may be transferred as part of commercial arrangements between HBF and its service providers. Service providers located overseas may also be able to access your personal information which is stored in Australia.

At the time of the publication of this statement, the countries which HBF discloses personal information to or from which personal information may be accessed includes the United States of America, the United Kingdom, Canada, India, Singapore, Germany, Ireland and the Philippines. A current list of countries in which information may be located is available on our website at [hbf.com.au/about-hbf/legal/privacy](http://hbf.com.au/about-hbf/legal/privacy)

HBF may disclose or provide access to recipients in countries not on this list where HBF's service providers or other third parties hold data or maintain their IT operations.

Also, as part of its direct digital marketing campaigns HBF may transfer some personal information (such as your email address) to social media platforms and other digital content operators located overseas in the countries listed above.

## Access to your information and contacting us

HBF will allow you to access and correct the personal information it holds about you as required by law. If you have any queries about how HBF handles your personal information, or would like to request access to or correction of that information, please contact HBF:

- By mail – HBF Privacy Officer, GPO Box C101, Perth WA 6839; or
- By telephone – 1300 810 475.

If you have any concerns or complaints about the manner in which your personal information has been collected or handled by HBF, please contact the Privacy Officer using the details above. You may opt out of receiving material, such as articles and information about provider arrangements by emailing [medicalgap@hbf.com.au](mailto:medicalgap@hbf.com.au) or [ancillaryproviders@hbf.com.au](mailto:ancillaryproviders@hbf.com.au)

The HBF Privacy Policy (available at [hbf.com.au/privacy](http://hbf.com.au/privacy)) contains further information about how HBF generally handles your personal information including:

- how you can access and correct personal information HBF holds about you; and
- how you can submit a privacy complaint to HBF and how HBF will deal with your complaint.

For medical providers outside WA, if you register with AHSA you should also refer to their Privacy Policy as to how the AHSA handles your personal information (including disclosure to HBF) as part of their arrangements with you.