

Privacy Commitment

Australian Unity and its subsidiaries respect the privacy rights of our members, customers and other organisations with whom we deal ("you"). Australian Unity is committed to complying with all applicable privacy laws including the Privacy Act 1988 (Cth) and Australian Privacy Principles.

Australian Unity and its subsidiaries include but are not limited to our dental centres, investments, financial planning, finance broking, building society, private health insurance, allied health and retirement living businesses. References to 'we', 'our', 'us' and 'Australian Unity' within this policy refers to the Australian Unity group of businesses.

What personal information do we collect?

We only collect personal information (including health information if you are a health or aged care customer) necessary to manage our relationship with you, administer the products and/or services you request, notify you about our products and services and to comply with applicable Laws. Information collected is only used and disclosed in a manner consistent with applicable Laws and this privacy policy.

The personal information we may collect, hold and/or use about you will depend on the type of product/service you request. Examples of personal information we may collect include, but are not limited to:

- Personal identification and contact details
- Banking, payment and contribution details
- Tax file & Medicare numbers
- Health and claims information (this may include clinical documentation if required to adequately assess any claims)
- Records of service contacts, inclusive of voice recorded telephone conversations
- Registration to Wellbeing programs
- Clinical information and medical history for allied health services
- Financial situation, needs and objectives
- Employment details and history

We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide you the products and services you have requested, provide you with information about other products and services offered by a member of the Australian Unity Group, or to meet our obligations under applicable Laws and standards (e.g. the Anti-Money Laundering and Counter Terrorist Financing Act (**AML**), US Foreign Account Tax Compliance Act (**FATCA**) and associated Australia/US Intergovernmental Agreement, Payment Card Industry Data Security Standard (**PCI-DSS**)).

For private health insurance members, if you are admitted to hospital as a private patient you will be required to sign a National Private Patient Election form (hospital claim form) consenting to being treated as a private patient. This form further states that you are providing consent to the hospital to supply clinical documentation from your medical record to your

health insurer, if Australian Unity requires this information to further assess a claim from the hospital for your episode of care.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access and disclosure. Additional privacy measures are employed to protect sensitive information (such as health information).

You have the right not to disclose your personal information to us. However, this may limit our ability to provide you with the products and services you have requested.

Where you provide us with unsolicited personal or sensitive information which we do not require to deliver products and services to you (for example on a phone call that is recorded), such information will be subject to our normal security arrangements for customer information. Where reasonable to do so, we will not hold unsolicited personal or sensitive information we do not require, however often we are unable to delete such information, particularly where it forms part of correspondence, phone records or other interactions that we do need to retain. Deletion in such circumstances is generally not reasonable or practicable.

Personal information records are held for a period considered appropriate to provide you with the product/service you require and consistent with applicable Laws and the Privacy Act. Should you cease to be a customer of Australian Unity, any personal information which we hold about you will be maintained for the relevant periods required by Law.

How do we collect your personal information?

We collect personal information from face to face interviews, application forms, claims forms, correspondence (written and verbal) and Wellbeing program registrations.

In most cases, we collect your personal information directly from you. However, if this is not practical, we may collect information about you from another person or entity.

Some examples of where this may occur include:

- Receiving information from a person to whom you have granted a delegated authority.
- Requesting spouse or dependant information related to family private health insurance cover from the main policyholder.
- Spouse and dependant information in the provision of financial planning services may in some circumstances be collected from one member of a couple.
- When you are admitted to hospital, personal information about you and your condition is provided by the hospital to the private health fund to enable your claim to be paid. At times it may be necessary to collect copies of clinical or operation notes to further assess a claim. We may be assisted with this process via our agent, the Australian Health Service Alliance Limited.
- Receiving information about a person who is to be nominated as a beneficiary, the life insured, a plan guardian or a nominated student of an investment bond.

How do we use your information?

We use your information to primarily manage, deliver and administer the products and services you request. Personal information may also be used so that we can offer products and services to you (including special offers and discounts), to extend our relationship with you and to develop products and services better suited to our customers needs. We may also use and analyse your information to meet our obligations under applicable Laws, for example the Know Your Customer requirements of AML and FATCA.

We respect the rights of our customers to choose the material they want to receive and how they wish to receive it, including by electronic means. You can therefore choose to receive only the materials you want by calling 13 29 39.

Wellbeing Programs

We may use information to develop specific health programs for our health insurance members. Programs may be of a general nature and available to all private health insurance members and some programs may be offered on an invitation only basis (based on a set of criteria) with the aim of treating a specific illness or condition (e.g. coronary artery disease). We may also provide your information to other health service providers, if your condition warrants, and they may contact you to offer services (e.g. in-home rehabilitation services).

Participation in any program is voluntary and conducted on an opt-in basis, following an initial contact from us or our health service provider. Upon opting into a program, you will be advised of any further privacy matters that may relate directly to your participation. You may withdraw from a program at any stage.

Who do we disclose information to?

Australian Unity will only disclose personal information to third parties for the purposes of managing, delivering and administering the product and/or service you require and in accordance with this policy and applicable Laws.

For example, we may disclose **relevant** personal information to:

- Agents and brokers (intermediaries) to enable them to efficiently answer enquiries and process transactions, including banking transactions and applications for banking products/accoint opening.
- Where you are a member of a corporate health insurance plan, the corporate entity or your employer to enable reconciliations, tracking of premiums and to meet other information needs.
- A person acting on your behalf including a financial advisor, trustee, attorney or person to whom you have granted a delegated authority.
- Service providers engaged to carry out functions on our behalf (e.g. mail houses, outsourced administration services, ATM network and credit card providers, credit reporting agencies, other financial institutions as required, solicitors/conveyancing agents, property valuers, property insurers, software or IT service vendors claims or fraud auditors/investigators and internal or external claims assessors for past or pending claims). Some of these service providers may be located overseas. Your personal information will only be stored overseas by one of our service providers in accordance with this policy and applicable laws.

- Hospital and other health service providers, in order to: (i) query your level of cover including any excess to provide services to you and/or enable them to process your claim directly with Australian Unity electronically; or (ii) provide you with clinical services for a specific condition, such as in-home rehabilitation services.
- If you have acquired a product via membership of a corporate group (e.g. corporate health plan) or alliance partner, your personal information may be shared with that corporate group or alliance partner.
- Your financial advisor who in turn may disclose information to superannuation funds, trustees, insurance providers and product issuers for the purpose of giving effect to your financial plan and recommendations made by them.
- If a financial adviser, funeral director (for funeral bonds) or broker (for loans) has referred you to our products then your details (including ongoing investment and transaction details) may be provided to that adviser, the adviser's dealer group, the funeral director, the broker or the organisation for whom they work.
- For legal reasons, disclosure may need to be made to law enforcement agencies, regulators, government agencies, courts or external advisors (e.g. to meet our obligations under AML and FATCA).

Australian Unity group companies may disclose personal information to other companies within the Australian Unity group. This information is provided on a confidential basis and will only be used for the purposes of the Australian Unity Group.

Information Security

We have systems and processes in place designed to hold your information securely. Only authorised personnel are granted access to your information. We also have in place processes designed to identify you when you deal with us by phone, online or face to face. These processes are designed to ensure we only disclose your information to you, or someone properly authorised by you. You need to keep access details like users names, passwords and PINs confidential and not share them or leave them somewhere that is easy for others to access or find.

Website

If you access your account information online through our website (using a registered user identification), we may collect personal information electronically. For example, we may collect information about your visits by using 'cookies'. A cookie is a packet of information which is sent by our website to your computer to track your use of our website and to allow you to efficiently access your account information. Generally, we use cookies for security purposes and to assess the usage and improve the functionality of our website.

We use both session cookies and persistent cookies. A session cookie is temporary and is automatically destroyed once your web browser is closed. All of the e-commerce and customer service functions of our website rely on session cookies. These web pages will not work if session cookies are explicitly blocked or disabled within a web browser. A persistent cookie is a small text file stored on the user's computer for an extended period of time. Your web browser can be set to reject cookies. If you reject persistent cookies you will still be able to access our website, but may not be able to use certain features or the web service may not recognise you (e.g. online banking).

We take care to ensure that the personal information you give us on our website is protected. Australian Unity uses a range of

security measures to help ensure this security. Our website contains more detailed information on specific privacy and security procedures.

Our website contains links to other sites, which are not subject to our privacy standards, policy and procedures. You will need to review those websites directly to ascertain their particular privacy policies and practices.

Access and Correction

You have the right to correct your personal information held by us if you believe it to be inaccurate or out of date. We will then amend our records accordingly. If we disagree with the correction, we will advise you of the reasons for doing so and will make a note on your record of this.

You have the right to access your personal information. This can be arranged so by calling 13 29 39 or writing. Your request should include a detailed description of the information required. To ensure information is only disclosed to those entitled to it you may be asked for identification, or in the case of a telephone call asked to answer a series of questions to verify your identity.

If we are unable to provide you with access to your information, we will inform you of the reasons why.

Privacy Enquiries & Complaints

If you have an enquiry or complaint about our information handling practices, please contact us by calling 13 29 39 or alternatively write to:

Group Privacy Officer
Australian Unity Limited
114 Albert Road
South Melbourne VIC 3205

It is our intention to resolve any complaint as quickly as possible and to your satisfaction. If you are unhappy with the response provided by us, you may refer your complaint to the Office of the Privacy Commissioner for further consideration.

Office of the Privacy Commissioner
Phone: 1300 363 992

This privacy policy is made on behalf of Australian Unity Limited (ABN 23 087 648 888) and its subsidiaries. Dated: July 2014