



Information Handling Policy

MBF group of companies

Who we are

In this Information Handling Policy, references to 'we', 'our', 'us' and 'MBF' refers to the **MBF group of companies** including MBF Australia Limited, MBF Travel Pty Limited, MBF Alliances Pty Limited, MBF Life Pty Limited, MBF in2life Pty Limited, MBF Health Management Pty Limited, MBF Management Pty Ltd, and to those companies in the MBF group of companies, including MBF Limited and entities who trade under the **ClearView Retirement Solutions** brand including ClearView Financial Management Limited and ClearView Life Nominees Pty Limited.

MBF Australia Limited and MBF Alliances Pty Ltd offer health insurance, MBF Travel Pty Limited offers travel insurance, and ClearView Retirement Solutions offers financial and retirement advice, services and products, throughout Australia.

This MBF Information Handling Policy is current as at 1 September 2005.

Your privacy

This document sets out how we deal with your personal information.

We respect the privacy of any personal information we collect about you. We are bound by the Privacy Act 1988 (Cth) and other applicable privacy laws including the New South Wales Health Records and Information Privacy Act 2002, the ACT Health Records (Privacy and Access) Act 1997, Victorian Health Records Act 2001 and the Federal Health Administration Act 1982.

Definitions

Financial service includes the provision of financial products such as life insurance, travel insurance, superannuation, managed investments and the provision of financial planning and investment advice.

Member includes a member of a health insurance policy provided by us or a customer to whom we provide financial services.

Why does MBF collect personal information?

We collect your personal information (personal information is as defined in the Privacy Act 1988 (Cth) and includes sensitive information, eg health

information) so that we can provide you with health insurance and financial services, and so that we can continue to operate an efficient and sustainable business.

What kinds of personal information does MBF hold?

The type and amount of information we hold will depend on whether you have been a member or have made an application to be a member and the extent to which you have used our services.

If you apply to be, are, or have been a member, the personal information we may hold about you includes:

- name, address, gender, marital status, contact details and date of birth;
- payment details;
- records of service contacts such as voice recording of telephone conversation;
- census and statistical-type information for purposes including product development and risk assessment;
- MBF AutoPay and direct debit/credit details;
- claims details such as date, amount claimed and amount paid; and
- tax file number.

Additionally, for financial services:

- details of the financial service or product you applied for and details of any financial products you have invested in (including account details);
- your financial interests and sometimes your financial position;
- occupation;
- your employer details;
- your tax file number; and
- for insurance products - certain medical, family and lifestyle information.

Additionally, for health insurance:

- current and past level of cover;
- changes of cover, cancellations and suspensions of membership;
- rebate registration details;
- Medicare number;
- registration for health management programs;
- employer details for corporate members;
- health information; and
- claims information.

If you joined a health management program such as our asthma or diabetes management program, we may also hold personal information relating to your participation in that program.

Generally, we do not hold personal information about non-members except those people who have contacted us for further information about our products or services, or where a member provides information to us about another person. We may also hold information about persons who have been designated to pay or act on behalf of MBF members.

We will give you the option of transacting anonymously with us where possible.

Sensitive information

If you apply for certain products or services or if you make a claim under certain products, we may need to collect sensitive information about you. For example, depending on the product, this may include your health information. This is collected and used only in accordance with the National Privacy Principles and this policy.

How does MBF collect personal information?

To provide the best products and services to suit your needs, we collect information from you when you:

- complete an application form for one of our products;
- contact us in person, by phone or online;
- lodge a claim; or
- participate in a Health Management Program

Though we try to collect information about you directly from you, sometimes we might also collect information about you from another person or entity. For example, if we wish to perform risk assessment on our membership base, census, survey and statistical-type data from external providers. Further examples include:

For health insurance

- you are covered by couple or family cover and we collect information from another person on the membership;
- you go to hospital, we will collect information directly from the hospital;
- you go to an ancillary provider, we may collect information from the provider; or
- you are a corporate member and we collect information from your employer and/or a broker. This information may include details such as your payroll number.

For financial services

- there is more than one person on the policy and information is collected about each of them; or
- we may collect information about you from medical providers or other professional experts in order to provide you with a policy or assess a claim.



If you provide information to us about another person, then you need to tell that other person that you have done so, who we are, that they may access their personal information, and you may want to refer them to this policy.

Couples and family health insurance membership

Information about dependants (spouse or partner and children) on health insurance memberships is collected from the Primary Member or with the authorisation of the Primary Member.

For example, we collect this information when the Primary Member completes an application form or when a claim is made.

We collect information on dependants on the membership with the consent of the Primary Member. If you are a dependant over 16 years when the Primary Member lodges a claim on your behalf, we assume they have your consent to give us all the information necessary to process the claim.

The reverse of this is that, if you are the Primary Member and you provide us with information about a dependant on the membership, we expect that you have that person's permission to give us the information and that you have told them you have given the information to us. Information collected during the course of the membership is also available to the Primary Member.

How does MBF use my information?

We use your personal information to provide, manage and administer your health membership and the financial services to you, to evaluate and pay claims, and to operate an efficient and sustainable business.

As part of those processes, we may collect, use and disclose your information to:

- process your application;
- process payments, withdrawals and redemptions;
- investigate and assess any claim;
- contact you about matters relating to you, your health insurance, financial services provided to you or our other services (these services may change from time to time);
- answer your enquiries;
- meet internal functions such as administration, accounting and information technology systems;
- practice effective risk management and prevent fraud;
- monitor, price and evaluate products and services;
- conduct marketing, research and statistical analysis;
- resolve complaints;
- report to and obtain information from regulatory authorities;
- reinsurers;
- third party assessors of underwriting or claims;
- auditors and other service providers we may appoint to ensure the integrity of our operations;

- any person acting on your behalf, including your financial adviser, executor, trustee and attorney;
- for health insurance products, help you improve your health and wellbeing and advise you of programs available to assist you;
- conduct customer surveys; and
- conduct Health Management Programs.

When will MBF use my information to contact me?

We use personal details to contact you about official notices advising of changes to your health cover or financial services and other purposes related to the products and services we provide to you. We might contact you about other services from MBF and other companies that may be of interest to you (unless you notify us that you do not want us to communicate this information to you).

For health insurance members, these notices may be through our publications, *Living Well* or *Here's Health*, or sent to you separately. We might also contact you to inform you about other benefits of your MBF health membership. These include extra privileges, new products and health and disease management programs. For financial services customers, these notices may be through the ClearView *Viewpoint* magazine.

Receiving marketing material

From time to time, we will provide you with information about products and services from our group of companies or other affiliate organisations that we consider of potential benefit to you and your family.

We may share your personal information on a confidential basis to our related entities so that they can offer you products and services.

You can choose not to receive marketing material and we ask that you contact us to exercise this choice. Please understand that there could be a delay of up to 60 days before your request is fully implemented, and we apologise if you receive marketing material in this time.

You will find details on how to contact us at the end of this policy.

How will MBF disclose my personal information?

We may need to disclose your information to others to provide you with health insurance and financial services and to operate an efficient and sustainable business when performing the following kinds of services:

- marketing, research and statistical analysis;
- IT development and maintenance;
- accounting and auditing services;
- claims assessment and processing such as medical professionals, claims assessors and lawyers;
- customer surveys; and
- Health Management Programs.

It is our policy that, where member information is disclosed, contractors and service providers agree to be bound by the Privacy Act. We may also be required under law to disclose your information to someone else or to a government authority. We do not sell personal information to anyone.

For couple and family health insurance cover, the Primary Member is responsible for maintaining the policy and paying premiums. So, we will disclose information to them about benefit limits and treatment for all persons covered by the policy.

In the course of providing you with our products and services, some of the organisations to which we may disclose your personal information (including companies in the MBF Group and state and government agencies) are located outside New South Wales in other states or territories in Australia. MBF may send your personal information to them, including electronically transmitting data. When we do so, we require them to handle your personal information in the same way we do and will do everything reasonable to ensure your personal information is kept secure from unauthorised access or disclosure.

What other legislation affects MBF's use and disclosure of personal information?

In some circumstances, the collection, use, disclosure and access of personal information is governed by specific legislation. Where there is specific legislation, this will generally govern how we use the information despite the provisions of the Privacy Act 1988 (Cth).

For example, for health insurance products, legislation such as the National Health Act 1953 and the Private Health Insurance Incentives Act 1998 require us to collect certain information about you. For certain financial services products, we are required to collect your tax file number and provide that information to the Australian Taxation Office.

How does MBF keep my information secure and for how long is it kept?

We take all reasonable steps to ensure that your personal information is kept secure and is retained for the period for which it is needed. We ensure that your personal information is kept secure and is protected from misuse or unauthorised disclosure by ensuring that authorisation processes are followed for allocation of system rights to employees. Your information is kept as long as we need it to provide the products and services you requested from us and, in some circumstances, to comply with statutory requirements.



Can I access my personal information?

You can ask us for access to information we hold about you at any time.

For health insurance and travel insurance

Call MBF on 131 137 to discuss your request with one of the Customer Care consultants; or

For financial services

Call ClearView Retirement Solutions on 1800 265 744 or MBF Life Limited on 1800 213 839 and ask for a request form to be sent to you to complete.

We are committed to handling your request properly and promptly, so all requests for access are handled in our head office. We cannot give access to information in MBF Member Centres.

We will endeavour to meet your request for access. However, access to some information may be denied, including where:

- we no longer hold or use the information;
- we cannot disclose the information because of legal proceedings or a court order;
- disclosing the information would unfairly prejudice the privacy of another person;
- the request is frivolous or vexatious; and
- where access would pose a threat to the life or health of the member.

We will tell you the reasons why we cannot give you access to the information you have requested when we respond to your request.

There is no charge for making a request for access or for obtaining a summary document of the information we hold containing the following information:

- member's name, address and birth date;
- contact details;
- level of cover;
- details of the products held;
- date of joining; and
- bank account details.

For health insurance

- dependants' names and birth dates;
- date of joining or changing over;
- recent payment history and frequency;
- MBF AutoPay, direct credit and rebate registration details; and
- registration for any health management programs.

For health insurance, if you have access to the Internet, much of this information can be accessed via MBF member self service on the MBF website at mbf.com.au

Please contact MBF on 131 137 if you would like more information or assistance in relation to MBF member self service.

For access to recorded telephone conversations, we will give access to the recording (if MBF still holds this information) but will not provide a written transcript of the conversation.

There is a charge for access to any other information and you will need to put your request in writing. The charge is restricted to recouping our costs of providing the information to you. For example, the cost of photocopying, document retrieval, labour and delivery to you.

Correction of records

You can ask us to correct the information we hold about you if the information is out of date or inaccurate. We will amend your record or, where we disagree with the change you request, we will give you a reason and put a note on your record that you disagree. MBF may also correct the information it holds about you if we become aware it is out of date or inaccurate.

Our online information handling policy

Data collection and use

The information handling practices for personal information outlined in this document also relates to personal information collected online via the MBF website referred to above. In addition to personal information, when an individual accesses any MBF website, anonymous technical information may be collected about user activities on the websites. This usage data may include the browser used to view our websites and the pages visited by a user.

We use this information to make educated decisions about maintaining and improving our websites. This information remains anonymous and is not linked in any way to personal identification details.

Cookies

A cookie is a small text file that is sent to your browser by a website and stored on your system. A session cookie, which is the only cookie type used by us, is a cookie that is stored only for the duration of your session with our websites and removed once your session is terminated. We use third party session cookies to collect anonymous information on user activities.

This information is used for the sole purpose of enabling us to use accurate and objective business intelligence to make educated decisions about our interactive environment. This information remains anonymous and is not linked in any way to personal identification details.

You may adjust your browser preferences to selectively accept cookies or turn cookies off. However, if you turn cookies off, there may be some features of our websites that will not be available to you or some web pages may not display properly.

How do I make an enquiry or complaint about a breach of privacy?

You can make an enquiry or a complaint about our handling of your personal information at any time by contacting the Privacy Officer as set out below. We will generally require you to set out your complaint in writing.

For health insurance, including MBF in2life, MBF Health

The Privacy Officer
MBF Australia Limited
GPO Box 3382, Sydney NSW 2001
Phone (02) 9323 9989, fax (02) 9222 1762

For ClearView

The Privacy Officer
ClearView Retirement Solutions
GPO Box 4232, Sydney NSW 2001
Phone 1800 265 744

For life insurance

The Privacy Officer
MBF Life
GPO Box 4232, Sydney NSW 2001
Phone 1800 213 839

For travel insurance

National Manager
MBF Travel
116 Adelaide Street, Brisbane QLD 4000
Phone (07) 3239 4777