

AIA HEALTH PRIVACY POLICY

July 2022



Health

1. Introduction

AIA Health Insurance Pty Ltd (AIA Health) ABN 32 611 323 034 is a registered private health insurer and is committed to protecting your privacy.

This Privacy Policy explains the types of personal information and sensitive information, including health information, we collect and how we handle that information as a part of your relationship with us. It is based on relevant requirements in the *AIA Code of Conduct* and the *Privacy Act 1988* incorporating the Australian Privacy Principles.

Any references to 'we', 'us', 'our' in this Policy means AIAH.

In this Privacy Policy, 'personal information' means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Personal information includes:

- 'Sensitive information' which includes health information and information or an opinion about an individual's racial origin, political opinion, membership of a political association or trade union, religious beliefs, sexual preferences or criminal record; and
- 'Health information' which includes information or an opinion about the health or a disability of an individual, the individual's wishes about the provision of health services, or health services provided or to be provided to an individual.

In this Privacy Policy, a reference to personal information includes sensitive and health information.

2. Collection of your personal information

Personal information collected by us includes your name, date of birth, address, email address, contact details and Medicare number and may also include your bank account or credit card details.

Sensitive information collected by us includes information about your health, health services provided to you and your claims history.

We collect personal information in writing, by telephone, by email or via our website. For example, we may collect personal information when you:

- obtain a quote from us or request information about our products and services;
- make an application for private health insurance;
- enter information on our website, even if you do not submit that information to us (for example, where you start completing an online application but do not complete and/or submit that application);
- submit a private health insurance claim;
- have customer interactions with us where we record system notes and voice recordings of telephone conversations; or
- use our webchat function.

We may also collect your personal information from third parties such as:

- hospitals and other healthcare providers in order to process your private health insurance claims, conduct eligibility checks and to comply with laws such as the *Private Health Insurance Act 2007* (Cth), the *Private Health Insurance (Prudential Supervision) Act 2015* (Cth) and the *National Health Act 1953* (Cth);
- your previous health fund to cancel your membership and request a transfer certificate;
- the policyholder (who is the person responsible for the management of your private health insurance membership) or a person authorised to provide us with information on your behalf in order to provide you with private health insurance cover and pay you benefits;
- organisations who market, distribute and sell our products and services including under their own brand (Third Party Distributors);
- organisations engaged by us to carry out functions on its behalf such as data analysis/matching providers,

AIA Financial Services Limited (AIAFS) which assists in the operation of the AIA Health call centre and website, assists in the sale and distribution of AIA Health products and services and engages Third Party Distributors to market, distribute and sell our products and services.

(please see Part 6 of this Privacy Policy for links to the privacy policies applying to AIAFS); and

- brokers and intermediaries who provide private health insurance information and services on behalf of us such as aggregators and independent financial planners.

If you purchase AIA Vitality and choose to activate your AIA Vitality membership, we will also collect your personal information from AIA Australia Limited (AIAA) which provides and administers the AIA Vitality program. This includes viewing the activities you have undertaken as part of the AIA Vitality program and the Vitality points you have earned, and collecting your Vitality status from AIAA to determine whether you are eligible for a premium discount. AIAA and its related bodies corporate, including AIAFS (together, the AIAA Group) may also engage Third Party Distributors to market, distribute and sell our products and services and we may collect your personal information from the AIAA Group in that capacity. Please see Part 6 of this Privacy Policy for a link to the privacy policy of the AIAA Group which applies to AIAA.

If you choose not to provide us with personal information, we may not be able to provide you with the products and services you require. For example, we may not be able to pay health insurance benefits, assess or adjust your lifetime health cover loading or apply an entitlement to the Australian Government Rebate on private health insurance as a premium reduction.

3. Provision of information about another person

If you provide us with personal information about other individuals (such as other persons on your health insurance membership or other immediate family members), you must ensure that they are aware, or will be made aware, of your provision of their personal information to us and how their personal information will be handled under this Privacy Policy.

If the information you are providing to us is health information or sensitive information, you must first obtain the individual's consent to disclose the information to us.

If:

- you are responsible for the management of your private health insurance membership by taking out private health insurance with us; or
- any of you, your spouse/partner and/or dependent children (if any), provide any of you, the spouse/partner's and/

or dependant children's personal (including health and sensitive) information to AIA Health for whatever purpose, you consent to, and warrant that your spouse/partner and/or dependent children have consented to, us collecting, using and disclosing your and/or their personal (including health and sensitive) information, however collected by us, in accordance with this Privacy Policy.

4. Collection of information via our website

When you first visit our website, information about your computer or web device is automatically recorded by our website. This includes your IP address, your top level domain name, the date and time of your visit to our site, the pages you accessed or downloaded, the address of the last site you visited, your operating system and the type of browser used.

This information is collected for statistical and administrative purposes, and to improve our web based services. It does not readily identify individuals, and we will not attempt to identify individuals from the records our server generates unless it is necessary to do so for law enforcement purposes.

We may also use cookies to assign your device a user ID. Cookies contain information that allows us to identify your device. We may use this information to determine whether or not to display standard content. You can configure your browser so that it does not accept cookies, however this may minimise our ability to provide you with customised information.

We use a third party service to collect general information about how people use our website. This anonymous information is aggregated, and doesn't reveal personally identifiable information about anyone who uses our website.

Further details can be found in the Website Terms of Use on the AIA Health website at health.aia.com.au

5. Purposes for which we collect, hold, use and disclose your personal information

We collect, hold, use and disclose your personal information to provide you with private health insurance and health and wellness related services including to:

- manage our ongoing relationship with you;
- answer any queries you may have in relation to our private health insurance products, the AIA Vitality program and health and wellness related services;
- administer, process and audit private health insurance claims and pay private health insurance benefits;
- collect and process payments in respect of your private health insurance and AIA Vitality program premiums;

- assess your suitability for, enrol you in and administer health and wellness related services such as chronic disease management programs, health management programs and coaching programs;
- provide you with the opportunity to participate in our fitness groups and/or attend health seminars and community health events;
- conduct customer surveys including satisfaction and net promoter surveys;
- conduct marketing, research and analysis including internet based marketing such as targeted online advertising and online behavioural marketing;
- provide you with access to our website member portal area to manage your own private health insurance membership and a web chat function;
- manage, review, develop and improve AIA Health's private health insurance products, related services (including health and wellness services) and third party products and services, whether provided by us, AIAA or other parties;
- pay a commission to a broker or intermediary, such as aggregators and independent financial planners, or (if applicable) a Third Party Distributor; and
- comply with its legal and regulatory obligations.

We may also collect, hold, use and disclose your personal information to:

- recruit and train our personnel;
- resolve any legal and/or commercial complaints or issues (including, in relation to compensation recovery);
- meet legislative requirements relating to private health insurers; and
- perform any of our other functions and activities relating to our businesses.

We will also use your personal information to prepare reports and de-identified/aggregated data sets (including with respect to claims data).

Our range of products and services and our functions and activities may change from time to time.

6. To whom we disclose your personal information

In order to carry out the above purposes, we may disclose your personal information to persons or organisations engaged by us to assist us in carrying out the above purposes such as archival providers, auditors, customer contact providers, call centres, mail-houses, professional advisors, data analysis/matching providers, marketing service providers (including social media providers), information brokers, researchers, website and technology service providers, email and print service providers, advertising agencies, data and email storage providers, back

up and cloud computing providers and data processing organisations. This includes disclosing personal information to AIAFS which assists in the operation of our call centre and website and in the sale and distribution of our products.

If you purchase a product through a Third Party Distributor, we and the Third Party Distributor may share your personal information with each other, including information to resolve or report to the Third Party Distributor in relation to complaints and other issues raised by you and to pay commissions. If the Third Party Distributor is engaged by AIAFS or AIAA, then your personal information may be shared between us, AIAFS/AIAA (as applicable) and the Third Party Distributor.

AIAFS will handle all personal information they collect about you in accordance with its privacy policy which may be accessed at aia.com.au. This privacy policy provides contact details and explains how you may access and correct your information, or make a complaint.

We may also disclose your personal information to:

- shareholders and their related bodies corporate;
- government authorities such as Medicare Australia, the Commonwealth Department of Health and the Australian Prudential Regulation Authority;
- hospitals and medical and general treatment providers;
- providers of specialised health and wellbeing and chronic disease management programs;
- data analysis providers and marketing service providers including social media providers (such providers may combine the personal information AIA Health discloses to them with information they already hold about you in order for such providers and/or AIA Health to provide you with more relevant advertising about products and services);
- other private health insurers when you transfer to or from another private health insurer;
- persons authorised by you; and
- financial institutions to process payments.

If you purchase AIA Vitality, AIA Health will disclose your personal information to AIAA in order for AIAA to register you for, and administer and improve, the AIA Vitality program. This includes disclosing your contact details for the purpose of establishing your AIA Vitality membership, information about you suspending or terminating your private health insurance policy and changes to your contact details. If you purchase AIA Vitality, we may also disclose your personal information to AIAA in order for AIAA to determine your eligibility for discounts, offers or benefits which AIAA offers from time to time on products and services offered by AIAA, where eligibility for such discounts, offers or benefits is based on you holding an AIA Health membership. AIAA will handle all personal information it collects about you in accordance with the AIAA Group's privacy policy which may be accessed at

aia.com.au. The AIAA Group's privacy policy provides contact details and explains how you may access and correct your information, or make a complaint.

Irrespective of whether or not you purchase AIA Vitality, we may disclose de-identified and aggregated data (including claims data) and reports to AIAA, AIAFS and (where relevant) Third Party Distributors about AIA Health members.

If you are not the policyholder of your health insurance membership, we may disclose your personal information to the policyholder as part of administering the membership and paying benefits. This may include the disclosure of sensitive and health information about benefits claimed by you under your membership in the form of quarterly and annual benefit statements.

AIA Health's contracted partner, the Australian Health Service Alliance (AHSA), may collect your personal information from AIA Health and use your information and/or disclose it to AIA Health or your health service provider, for the purposes of providing health services to you and/or managing the funding of those services, or as required by law. AHSA's privacy policy, at ahsa.com.au/web/ahsa/privacy_policy, provides its contact details and explains how you may access and correct your information, or make a complaint.

We may also disclose personal information to parties involved in a prospective or actual transfer of our assets or businesses.

7. Transfer of information outside Australia

If you submit personal information through the AIAH website, that information may be routed through Hong Kong. However, all personal information collected by us is stored in Australia.

Your personal information collected by AIAA and AIAFS may be disclosed overseas. Please refer to the AIAA Group's privacy policy which applies to these entities at aia.com.au for more information.

8. Direct marketing and your privacy

From time to time, we (or service providers on our behalf) may contact you to provide you with information about other promotions or products and services offered by us, or other service providers who have a relationship with us (for example, AIAA, AIA Vitality partners, Third Party Distributors and financial advisors), that we consider may be of benefit to our members. When we contact you it may be via mail, phone, facsimile, email and/or SMS.

Personal information is shared by us with AIAA, AIAFS and their related bodies corporate (AIAA Group) and entities within the AIAA Group may use this information to contact you (including by mail, phone, facsimile, email and/or SMS)

in relation to their products or services or the products or services of third parties.

When you become an AIA Health member, unless you contact us to withdraw your consent, you consent to us using your personal information, and the AIAA Group using personal information which it receives from us as contemplated by this Privacy Statement, for direct marketing purposes (for an indefinite period including after you may cease your membership with us).

We may also engage marketing service providers including social media providers to provide you with internet based marketing including targeted online advertising and online behavioural marketing. Such providers may combine the personal information we disclose to them about you with information they already hold about you in order for such providers to provide you with more relevant advertising about products and services.

If you do not wish to receive marketing material from us, and you do not wish the AIAA Group to use your personal information disclosed to it by us for direct marketing purposes, you can unsubscribe at any time using the unsubscribe facility in our electronic direct marketing communications sent to you or you can contact us at any time to let us know by:

Email: health.memberservices@aia.com.au
 Mail: PO Box 7302 Melbourne, Vic, 3004
 Calling: 1800 333 004

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

If you notify us that you do not wish to receive marketing material from us and that you do not wish for the AIAA Group to use your personal information disclosed to it by us for direct marketing purposes, please note that:

- we will still contact you in relation to our ongoing relationship with you. For example, we will still send you bills, statements and notices that are relevant to the products and services you hold with us; and
- If you have separately acquired products or services from, or otherwise established a relationship with, the AIAA Group, you may still receive marketing material from the AIAA Group using personal information they have collected about you other than from us unless you have separately notified the AIAA Group that you do not wish to receive such materials from them.

Information regarding how you can opt out of receiving marketing material from the AIAA Group is included in the AIAA Group's Privacy Policy located at aia.com.au.

9. Accessing and correcting your personal information

We have processes in place to ensure that personal information we hold is accurate, complete and up to date. Please let us know if there are any errors in your personal information and keep us up to date with changes to your personal information such as change of address.

We will also allow you to access personal information we hold about you as permitted under relevant legislation.

You can request to access or update your personal information by:

Email: health.memberservices@aia.com.au
 Mail: PO Box 7302 Melbourne, Vic, 3004
 Calling: 1800 333 004

If we do not provide you with access to your personal information, or refuse to correct your personal information, we will advise you of the reasons for the refusal in accordance with law.

In some circumstances we may require you to pay the reasonable cost of providing access to personal information we hold about you.

10. Contact us and complaints about privacy

If you have any queries, concerns or complaints about the manner in which your personal information has been collected or handled by us, please contact a member service consultant by:

Email: health.memberservices@aia.com.au
 Calling: 1800 333 004
 Mail: PO Box 7302, Melbourne, Vic, 3004

We respond to all telephone calls during business hours, and will endeavour to acknowledge receipt of all e-mail and telephone messages within 2 business days.

Where necessary, the member service consultant will escalate your privacy query, concern or complaint to a member service manager and/or our Privacy Officer. We will investigate your concern and/or complaint, keep you informed of progress and will endeavour to provide you with a response in a timely manner.

It is our intention to use its best endeavours to resolve any privacy related complaint to your satisfaction. However, if you are unhappy with our responses, you may contact the Office of the Australian Information Commissioner at oaic.gov.au who may investigate your complaint further.

11. Security of your information

We may store personal information we hold in hard copy documents or as electronic data in our software IT systems (and those of our service providers). We endeavour to take reasonable steps to protect all personal information that we hold from misuse and loss and to protect it from unauthorised access, modification and disclosure.

The methods we use to ensure your information is secure include:

- verification procedures to identify an individual before access is allowed to personal information;
- the use of data encryption, firewalls and other security systems for our IT platform; and
- document storage security policies.

12. Retention of information

We generally retain personal information we hold for as long as it is necessary to perform the function in relation to which the information was collected. However, we may retain personal information for longer periods to comply with legislative requirements for document retention.

13. Dealing with us anonymously

When you use our websites or ask for general information, we may deal with you without requiring you to provide personal information. However, aside from those circumstances, the nature of our business is such that it is generally not possible for us to deal with people on an anonymous basis.

14. Use of website

Our websites may contain links to other websites that are not owned, operated or endorsed by us. We are not responsible for the privacy practices of those websites, or for the content, products or services provided by or contained on those websites.

Further details can be found in the Website Terms of Use on AIA Health's website at health.aia.com.au.

15. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. We recommend that you review this Privacy Policy from time to time.