



# Bupa Business Connect Privacy Policy

Effective 15 October 2023

Bupa HI Pty Ltd ABN 81 000 057 590

## 1. Introduction

### 1.1 We care about your privacy

When you access the Bupa Business Connect Portal you agree that we will handle your personal information as described in this document.

Your privacy and maintaining the confidentiality of your personal information is important to Bupa. This document describes how we handle your personal information in the Bupa Business Connect Portal, including how we collect, store, use and disclose your personal information, how you can access and change your information, provide us with feedback, or make a complaint.

### 1.2 Definitions

In this document, 'we', 'us', 'our' and 'Bupa' refers to Bupa HI Pty Ltd (ABN 81 000 057 590) and its related entities. 'You', 'your' or 'Authorised User' refers to the users of the Portal and their personnel.

The additional terms below have the following meanings:

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<b>Admin User</b>	means your assigned Portal administrator.
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<b>Authorised User</b>	means you, the user authorised by your organisation to access the Portal.
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<b>Consent</b>	means your permission. Your consent can be express or implied. Express consent can be or verbal (e.g. when you give us your permission over the phone or in face-to-face conversations). Your consent will be implied when we can reasonably conclude that you have consented by either taking or not taking action.
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<b>Customer</b>	means a person who is currently receiving, has previously received products or services from us (such as a health insurance policy) and includes someone who had enquired about or expressed interest in our
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products or services (for example, by obtaining a quote or requesting further information).

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<b>Personal information</b>	has the same meaning that it has under the Privacy Act, namely information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified or reasonably identifiable individual.
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<b>Policy</b>	means a Bupa health insurance policy.
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<b>Policy holder</b>	means the holder of a Bupa health insurance policy.
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<b>Portal</b>	means the Bupa Business Connect Portal located at <a href="https://businessconnect.bupa.com.au">https://businessconnect.bupa.com.au</a> .
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<b>Privacy Act</b>	means the Privacy Act 1988 (Cth).
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## 2. Collection of your personal information

### 2.1 What kinds of personal information does Bupa collect?

The amount and type of personal information we collect from and hold about you will vary depending on whether you are an Authorised User or an Admin User of the Portal.

If you apply to be, are currently or have previously been an Authorised User or Admin User of the Portal, the personal information we hold about you may include:

- your full name, mobile number and email contact details;
- information about your role and organisation;
- records of our interactions with you, such as system notes; and
- online website usage data, for example when you browse our website(s).

### 2.2 How does Bupa collect personal information?

We may collect personal information from you 2 in a range of ways, including when you:

- register to use the Portal;
- complete a form or otherwise provide information when completing the registration process for the Portal; and
- contact us in person, by phone, email or online, or when we contact you in any of these ways.

We will always try to collect your personal information directly from you. However, there may be instances where we will need to collect your information from other persons such as the Admin Users.

If you have provided us with information about another person, you need to ensure that you have that person's permission to do so and inform them that:

- you have given us their information;
- they have a right to access their information; and
- they can refer to this document for information on how Bupa will handle their personal information in the Portal.

### **2.3 If you do not provide us with your personal information**

If you do not provide us with the personal information we reasonably require, we may be unable to provide you access to the Portal.

## **3. Use and disclosure of your personal information**

### **3.1 How does Bupa use your personal information?**

We use your personal information to provide, manage and administer the Portal and to operate an efficient and sustainable business. As part of these processes, we may disclose your personal information on a confidential basis to members of the Bupa Group and third-party service providers. In operating our business, we may use your information to:

- process your registration for the Portal, including providing you with the appropriate level of access;
- contact you in relation to any matter relating to the Portal;
- conduct quality assurance activities;
- carry out internal functions, including administration, training, accounting, audit, and information technology;

- practice effective risk management and prevent fraud by conducting audits and analysis of the use of the Portal;
- monitor and evaluate the Portal;
- answer your enquiries and resolve complaints;
- conduct market research and data analytics; and
- comply with laws and regulations.

### **3.2 Who does Bupa disclose your personal information to?**

We may disclose your information to other members of the Bupa Group and handle it in any State or Territory where we operate. In some circumstances we may be required to send your personal information outside of Australia. We will only do this in accordance with the Privacy Act, or your express consent.

In addition, to help us provide, manage, and administer our products and services and operate an efficient and sustainable business, we may need to disclose your information to third parties. This may include disclosing your information:

- to anyone engaged by us or acting on our behalf in relation to our business, such as service providers/suppliers;
- to industry bodies, government, and regulatory bodies, including Medicare, the Australian Taxation Office, the Department of Health, and the Commonwealth Ombudsman;
- to lawyers, auditors and other advisors appointed by us or acting on our behalf; and
- where disclosure is permitted or required by law, including in response to compulsory notices from courts of law, tribunals, or government agencies.

If we send your information outside of Australia, we will require the recipient of the information to comply with privacy laws and keep your information secure.

### **3.3 How does Bupa store personal information?**

We will take reasonable steps to securely store your personal information. This includes implementing a range of digital and physical security measures. In addition, we will restrict access to your personal information to those properly authorised to have access.

## 4. Accessing and correcting your personal information

### 4.1 Can I access my personal information?

You can ask us for access to the information we hold about you at any time. Simply contact us (see contact details below) to make your request. We will aim to meet your request within a reasonable time and in the manner requested by you if it is reasonable to do so. In some circumstances, we may not be able to give you access, such as where:GR

- we no longer hold the information;
- providing access would have an unreasonable impact on the privacy of others;
- the request is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings and would not normally be disclosed as part of those proceedings;
- providing access would be unlawful;
- denying access is required by law;
- providing access would be likely to prejudice the prevention, detection, investigation or prosecution of possible unlawful activity;
- the information would reveal our commercially sensitive decision-making process; and
- where access would pose a threat to the life or health of any individual.

If we are unable to give you access to the information you have requested, we will write to you with the reasons for our decision. If you have any concerns about the refusal, please see section 6 (Contacting Bupa) for further information.

We may charge you a reasonable fee for our costs in retrieving certain types of information for you. This charge will be limited to the cost of recouping our costs for providing you with the information, such as the costs of document retrieval, photocopying, labour and postal delivery (if applicable). We will not charge you for making a request for access to your information.

### 4.2 Correcting your personal information

To enable us to provide you with the best possible service, it is important that the information we hold about you is complete and accurate.

It is your responsibility to notify us if your details change or you believe that any information we hold about you is inaccurate, incomplete or out-

of-date. We will respond to your request within a reasonable period and take reasonable steps to amend your records.

In some circumstances we may decline to amend your records. If we decline, we will write to you and tell you why.

## 5. Your privacy online

### 5.1 Online data collection and use

When you visit a Bupa website, we will collect certain technical information about your activities on the website. This may include information such as the type of browser used, your IP address, location data (where available), dates and times, pages visited and various types of metadata.

We use this information to improve the browsing experience on our websites and digital products, as well as to optimise and personalise the use of Bupa websites and digital products (such as apps).

### 5.2 Cookies and other analytics tools

Our websites use “cookies” and similar online behavioural tracking technologies. Cookies are small text files placed on your computer by a web server when you access a website. We use cookies to collect data about which web pages are most popular, peak usage times, websites you have visited and other information that helps us make our websites more helpful and easier to use.

Cookies are designed to identify computers rather than individual users. We may, however, use them to help personalise your visit to our websites by linking the cookie on your computer to your personal information stored on our system.

You can choose if and how to accept cookies by configuring the preferences and options in your web browser. For example, you can set your browser to notify you when you receive a cookie or to reject cookies. If you decide not to accept cookies, however, you may not be able to gain access to all the content and functions of our websites.

We may also use products offered by third parties such as Google and Adobe to undertake activities such as website analytics, email campaign management and online behavioural advertising.

You can visit [youronlinechoices.com.au](https://youronlinechoices.com.au) for more information about how to opt out of certain behavioural advertising and for further information about how these tools work.

## **6. Contacting Bupa**

### **6.1 Your feedback**

If you have any questions, feedback, or concerns about this policy or how we handle your information, you may contact us at any time by calling us on 134 135.

You may also contact us by post or email. For all our contact details, please visit [bupa.com.au/contact-us](https://bupa.com.au/contact-us).

Bupa will investigate your concerns and manage your complaint directly with you.

When working with you to resolve your complaint, we will keep you updated on the progress of your complaint.

If you are not happy with Bupa's response, or if you do not feel your complaint has been resolved, you may seek advice from the Office of the Australian Information Commissioner by calling 1300 363 992 or visiting [oaic.gov.au](https://oaic.gov.au).