



PHOENIX HEALTH FUND

Phoenix Health Fund aims to provide the best quality Private Health Cover at the lowest contribution rates possible to OneSteel employees and members.

*Privacy Policy Statement* September 2005

**Contents**

*Phoenix Health is committed to protecting your privacy.*

*Any personal information you provide while visiting our website, talking to our consultants, joining or claiming will remain confidential.*

At Phoenix Health your privacy is assured.

**William Beaton**  
Manager

<i>Introduction</i>	2
<i>What personal information does Phoenix Health gather?</i>	2
<i>How does Phoenix Health use personal information?</i>	2
<i>Purposes for holding information collected</i>	2
<i>How does Phoenix Health collect personal information?</i>	
<i>Information gathered from you</i>	3
<i>Information gathered from third parties</i>	3
<i>How personal information is held</i>	3
<i>How personal information is used and disclosed</i>	
<i>Your consent</i>	3
<i>Disclosing your information to others</i>	4
<i>Consent of the individual</i>	4
<i>Access and correction</i>	4
<i>Security</i>	4
<i>Changes to the Privacy Policy Statement</i>	4
<i>Privacy complaints</i>	4

*Phoenix Health Fund Ltd is a Registered Health Benefits Organisation.*

*Phoenix Health Fund Ltd. ABN 93 000 124 863  
PO Box 156, NEWCASTLE NSW 2300  
Industrial Drive, Mayfield NSW 2304  
Freecall 1800 02 8817  
'Phone (02) 4941 1738, 4941 1741  
Facsimilie (02) 4968 2229  
Email [enquiries@phoenixhealthfund.com.au](mailto:enquiries@phoenixhealthfund.com.au)  
Website [www.phoenixhealthfund.com.au](http://www.phoenixhealthfund.com.au)*

## **Introduction.**

---

Phoenix Health Fund Limited ("Phoenix Health") has legal obligations to comply with the Commonwealth Privacy Act 1988 (as amended) and the Health Records and Information Privacy Act 2002 (NSW)..

Under the Act, organisations that are in possession of an individual's 'personal information' must observe strict restrictions and standards about the collection, use, disclosure and security of that information.

Phoenix Health is a national 'restricted membership' health fund. In the course of providing our service, there is certain personal information we may require from you. Phoenix Health's primary purpose in collecting personal information is for the provision of health benefits to you and to otherwise fulfil our legal obligations as a registered health benefits organisation. Phoenix Health has developed this Privacy Statement to inform you about how Phoenix Health will collect, hold, use, and disclose personal information of our customers, how individuals can gain access to personal information held by this organisation and how an individual may complain about possible breaches of privacy.

## **What personal information does Phoenix Health gather?**

---

The personal information we collect generally includes:

- Your name, address, date of birth, contact details and other personal details to set up an account for you
- Information about the status of your health insurance cover
- Information about claims you make or wish to make on your cover
- Information about your preference for products, services and benefits we offer from time to time

We may seek to collect personal information that is regarded as sensitive information or health information. We do so only with your consent or as authorised by law or if necessary in connection with a legal or equitable claim.

## **How does Phoenix Health use personal information?**

---

We collect and use personal information for the following purposes:

- To check your eligibility for membership or check your identity
- To process your application for services
- To approve transactions you wish to make
- To set up an account for billing your membership contributions
- To provide you with services you have requested
- To inform you of health-related products, benefits or services we think you might be interested in
- To inform you of other products and services we believe would benefit you
- To investigate and resolve complaints concerning the provision of services
- To comply with legislative requirements and provisions

## **Purposes for holding the information collected.**

---

We generally hold information for the following purposes:

- To approve transactions/claims you wish to make
- To provide you with services you have requested
- To inform you of products, benefits or services we think you might be interested in

## **How does Phoenix Health collect personal information?**

---

### **Information gathered from you**

We obtain most of your information from you directly, such as

- When you submit an application form to apply for a product or service
- When you submit a variation to level of cover or persons covered
- When you submit a claim for benefits
- Each time we have contact with you through our call centre
- Each time we conduct direct marketing surveys or in response to our direct mail

Sometimes we may ask to collect particular personal information about you. Unless we have already done so, when or before we collect that information, we will take reasonable steps to inform you of:

- the purposes for which the information is collected
- where applicable, any law requiring the information to be collected, and
- the main consequences if all or part of the information is not provided

### **Information gathered from third parties**

Phoenix Health will not collect any personal information about you from third parties unless it is unreasonable or impracticable to obtain the information directly from you. If this occurs, then Phoenix Health will take reasonable steps to notify you before or as soon as practicable after collection.

Phoenix Health may collect private information about you from third parties in the following circumstances:

- in circumstances where additional health information is required we may contact your nominated health provider with your consent.
- we may contact your health provider to clarify details provided by you
- from other individuals covered on your family membership
- With your authorisation, where services claimed may be compensable from another source, Phoenix Health may contact any persons necessary to establish eligibility of benefits for you
- from your employer, if you are part of a Payroll Deduction Scheme

## **How personal information is held**

---

We hold your personal information in a combination of computer storage facilities and paper-based files and other records.

These facilities and records are located on site at our head office and off-site at secured premises. Phoenix Health has strict information security policies and procedures in place to protect personal information held by us from misuse, loss or unauthorised access, modification or disclosure.

## **How personal information is used and disclosed.**

---

### **Your consent**

Sometimes we will ask you to consent to a disclosure of your personal information for a particular purpose. We may do so in writing, over the phone or on our website.

At other times, your consent will be taken as given where you indicate to us that you wish to obtain information about any products or services.

We also may disclose or use your personal information *without your consent* in the following circumstances:

- for a reasonably expected purpose which is related (or directly related if it is health or sensitive information) to the purposes for collecting the information as contemplated by this Privacy Policy Statement, or
- we reasonably believe it is necessary to assist an enforcement body to perform its functions, or
- we suspect that an unlawful activity has been, is being or may be engaged in and the personal information is a necessary part of our investigation or reporting of the matter, or

- we reasonably believe it is necessary to prevent a threat to life, health or safety, or
- we are authorised or required by law to do so, (eg. where information is required by bodies regulating us or in response to subpoenas or warrants), or
- we have contracted an external organisation to provide support services and that organisation has agreed to conform to our privacy standards and to allow us to audit them for compliance, or
- the disclosure is to a credit reporting agency in connection with us extending credit to you or recovering from you amounts that you owe under any contract you may have with us

## **Disclosing your information to others**

---

We do not disclose your information to others, except in the following cases except on a confidential basis;

- to organisations which provide services to us
- with your consent or where it is necessary to provide you with services
- where required by law
- to organisations which have requested us to provide services to you or who co-operate with us in offering products or services

Phoenix Health has a legal obligation under the National Health Act to participate in the Hospital Casemix Protocol (HCP) data collection by the Commonwealth Department of Health and Aged Care. Once data is collected it is de-identified for statistical use. The Australian Health Service Alliance (AHSa) is our agent for HCP data collection.

Other service providers we have arrangements with include our software supplier, travel insurance underwriters, mail houses, health providers and our electronic claims facilitator.

## **Consent of the individual**

---

In general, by providing us with personal information, you consent to the collection, use and disclosure of your personal information as contemplated by the Privacy Policy Statement, unless you advise us otherwise.

## **Access and correction**

---

Phoenix Health understands that your personal information is important, and will take all reasonable steps to ensure that the information is relevant, accurate and up to date. An individual may contact Phoenix Health to ascertain whether Phoenix Health holds any personal information about that individual.

If Phoenix Health holds personal information about that individual, then the individual may request access to the personal information by contacting the Privacy Compliance Officer.

If an individual establishes that the personal information held is not accurate, complete or up-to-date, Phoenix Health will take reasonable steps to correct the information.

In limited circumstances a request for access or correction may be denied. Phoenix Health will provide reasons for denial of access or a refusal to correct personal information.

If Phoenix Health denies a request for correction (for example, if Phoenix Health believes the correction is incorrect), then the individual may request Phoenix Health to annotate the information stating that the individual believes the information is incorrect or inaccurate, along with the particulars provided by the individual. Phoenix Health will take reasonable steps to comply with such requests, and will notify the individual in writing of its response. Phoenix Health will provide the notations to the recipients of the personal information to which the notation relates.

## **Security**

---

Phoenix Health has strict information security policies and procedures in place to protect personal information held by us from misuse, loss or unauthorised access, modification or disclosure.

Phoenix Health uses a secure waste disposal system for destruction of records containing personal information that does not need to be retained.

## **Changes to the Privacy Policy Statement**

---

We may change our policies and update the Privacy Policy Statement from time to time. We may send you an updated Privacy Policy Statement using methods we choose from time to time, and may publish it on our website at [www.phoenixhealthfund.com.au](http://www.phoenixhealthfund.com.au).

To get a copy of our most current Privacy Policy Statement, please contact us at the address shown on the front page.

## **Privacy complaints**

---

An individual should first direct any complaint of an alleged breach of the Privacy Act to Phoenix Health's Privacy Compliance Officer. Both the Commonwealth and New South Wales Privacy Commissioner may investigate complaints about acts or practices that constitute an 'interference with privacy' if Phoenix Health doesn't resolve the individual's concerns.

### **Contact Details**

**Privacy Compliance Officer**  
Phoenix Health  
PO Box 156  
NEWCASTLE NSW 2300  
Freecall: 1800 02 8817

**Office of the Federal Privacy Commissioner**  
Privacy Hotline 1300 363 992 (local call charge)  
[www.privacy.gov.au](http://www.privacy.gov.au)

Office of the NSW Privacy Commissioner  
Phone: (02) 9228 8585  
Email: [privacy\\_nsw@agd.nsw.gov.au](mailto:privacy_nsw@agd.nsw.gov.au)  
[www.lawlink.nsw.gov.au/lawlink/privacynsw/ll\\_pnsw.nsf/pages/PNSW\\_index](http://www.lawlink.nsw.gov.au/lawlink/privacynsw/ll_pnsw.nsf/pages/PNSW_index)