

# Euro-Center Sydney Pty Ltd • Privacy Policy

**Euro-Center Sydney Pty Ltd** ABN 86 064 798 607 ('Euro-Center Sydney', 'us' 'we' or 'our') values the privacy of your personal information. We are committed to protecting the privacy, accuracy and security of your personal information.

Our privacy policy complies with the Australian Privacy Principles set out in Privacy Act 1988 (Cth) as amended from time to time, and sets out how we collect, use and disclose your personal information.

This policy may be updated from time to time taking into account updated laws and subject to change in technology and our operations.

All personal information held by us will be governed by our most recently updated policy.

A current version of this policy will be published on our website or can be obtained free of charge upon request.

## Personal information we collect

The nature of the personal information we may collect from you includes:

- identity particulars, including the following: your name, address, date of birth, nationality, telephone number, email, occupation and drivers license number;
- your bank account details and credit card information;
- information we collect from providing you with our services;
- records of your communication with us; and
- information in relation to any insurance policy or insurance claim.

## Sensitive Information

We may also, with your consent, collect sensitive information in the form of your health information.

This is permitted by the Privacy Act in instances where such collection is reasonably necessary for one or more of our business functions or activities, or to comply with any legal or regulatory obligation we may have in relation to the provision of our service to you.

The health information we may collect from you in order to provide you with the appropriate service and local health assistance relating to any claims you have in connection with travel or expat health insurance, includes:

- medical history;
- medical diagnosis and prognosis;
- hospital admission and treatment records;
- treatment plan; and
- cost estimates for treatment proposed.

Your health information will only be collected and used for the primary purposes in the manner described in this policy.

## The purposes for which we collect, hold, use and disclose personal information

### The purpose for which we collect personal information

Collecting personal information is essential for us to effectively conduct and manage our business functions and activities. We will only collect your personal information for the primary purposes of our business functions and activities. These purposes include:

- to assess eligibility of the policy holder;
- to assess if a claim falls within the scope of insurance cover;
- to assess the quality of the medical treatment rendered;
- to provide you with local assistance and claims handling service in connection with travel and expat health insurance;
- carrying out claim assessments, claims processing, settlement and guaranteeing of both medical and non medical claims for policy holders and members under a set of policy conditions;
- communicating with you;
- responding to your inquiries;
- meeting our legal and regulatory requirements; and
- conducting and improving our business relationship with you.

## How we collect information

Your personal information is collected by lawful and fair means, and where practicable, we will collect your personal information directly from you. We may also collect your personal information from other persons who are authorised to act on your behalf.

We may obtain personal information over the phone, by fax, by email and in hard copy format.



We may also receive information collected from insurance companies and assistance companies or other agencies so that we can provide our services to you. We will collect personal information about you only if:

- you consent to the collection of the information obtained; and
- it is reasonable or practicable to do so.

In order for us to collect and hold personal information, we may also, as required, request a signed 'Consent for Release of Personal Information Form' from you.

### **How we may use and disclose your personal information**

We will only use and disclose your personal information in limited circumstances, including:

- for the primary purposes for which it was collected such as those described above (i.e. for our business functions and activities);
- where you have consented to the use or disclosure;
- where required or authorised by Australian Law, or to a court/tribunal;
- where we reasonably believe that the use or disclosure is necessary to prevent serious impact to an individual's life, health or safety or a serious threat to public health or safety.

We will not disclose your personal information for any other secondary purpose, unless your consent has been given or as required by law and we will not sell or license any personal information that we collect from you.

### **Accuracy of your personal information**

We rely on you to provide us with accurate and up to date information about you. If there are any changes to your personal information during the course of dealing with us, you are responsible for advising us.

We will take reasonable steps to ensure your personal information is kept up-to-date, accurate, complete and not misleading. If you believe the personal information we hold about you is incorrect or inaccurate, you can request that we update this information by contacting our Privacy Officer (details below).

We will correct information we hold about you if we discover, or you are able to show to a reasonable standard, that the information is incorrect or inaccurate. If you seek a correction and we disagree that the information is incorrect, we will provide you with our reasons for taking that view.

### **Security of your personal information**

We will take reasonable steps to protect the security of your information from misuse, interference or loss by restricting access to the information from unauthorised access or disclosure.

We hold personal information electronically and in hard copy paper format. For information that is stored electronically, we take reasonable security measures to ensure that personal information is protected by firewalls, secure logon processes and encryption technologies. Hard copy information is securely stored in a lockable filing system when it is not supervised during the claim administration process.

### **Access to your personal information**

We acknowledge that you have a general right under the Privacy Act to access the information we hold about you. However, we may not be required to provide you access to your personal information to the extent that (amongst other things):

- we reasonably believe access would pose a serious impact to the life, health or safety of any individual, or to public health or public safety;
- giving access would have an unreasonable impact on the privacy of other individuals; or
- the request for access is frivolous or vexatious; or
- the information relates to existing or anticipated legal proceedings between the entity and the individual, and would not be accessible by the process of discovery in those proceedings; or
- giving access would be unlawful.

You are able to request access your personal information by contacting our Privacy Officer (details below). You may be required to pay an administrative charge for associated matters, such as copying charges, but not for making the request itself. We may require up to 30 days from notice to comply with your request to access your personal information.

If we refuse your request to access the information we hold about you, we will provide you with our reason/s for doing so.

### **Direct Marketing**

We may from time to time, with your consent, use your personal information to provide you with marketing information about our services. We will always include our contact details in any direct marketing material, and give you the opportunity to opt out of any direct marketing.



## Disclosure of personal information to overseas recipients

Any personal information provided to us may be transferred to, stored by or disclosed to an overseas recipient. For example, we may disclose your personal information to an insurance company and/or assistance company (as the case may be) and any such company may be located overseas in locations such as, but not limited to, Europe, the United States of America, Japan, Denmark, Czech Republic and Hong Kong. The disclosure would be for the purposes of the assessment of claim eligibility, assistance services provided, updates in relation to reserves and payments made under the relevant policy. We may also use a server hosted overseas to store data, which may include your personal information.

Your personal information may also be processed by employees or by other third parties operating outside of Australia in countries including Czech Republic and Thailand. These employees may work for Euro-Center Sydney. Your personal information may also be processed by representatives and employees of Euro-Center Sydney's parent company, which is located in Czech Republic.

Before your information is disclosed to an overseas recipient we will take steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach privacy laws in relation to your personal information ('reasonable steps').

However, the reasonable steps may not apply, if we reasonably believe (when disclosing your personal information to the overseas recipient) that:

- the recipient of the information is subject to a law, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the Australian Privacy Principles protect the information; and
- there are mechanisms that you can access to take action to enforce that protection of your privacy.

## Dealing with unsolicited Information

We will take reasonable steps to determine whether or not information we receive could be unsolicited information. If we believe that information is unsolicited information, we will destroy the information as soon as practicable or ensure that it is de-identified.

## Anonymity when dealing with us

It is impracticable for us to deal with you anonymously when providing our services. However, only where it is practicable to do so, we may allow individuals the option of not identifying themselves to us. If you choose to deal with us anonymously, it

may affect our ability to assist you with our services including processing a claim and providing local assistance.

## Government Identifiers

We do not use government identifiers, such as tax file numbers or Medicare numbers, to identify an individual.

## Information you provide about other people

If you provide personal information to us about other individuals (for our primary purposes), we rely on you to have obtained consent from the individual on these matters, and that you will comply with the obligations under the Privacy Act for the disclosure of that information to us. If you do not, you must inform us, or our agents, before you provide the relevant information. We will not be responsible or liable for any breach of the Privacy Act

## Complaints

If you have reasons to believe that we have not managed your personal information in accordance with our Privacy Policy, or complied with our obligations under the Privacy Act, please refer any concerns or complaints to our Privacy Officer (details below).

We will ensure your concerns or complaints are handled by our Privacy Officer in an appropriate and reasonable manner.

## Contact Us

Please refer any queries & complaints regarding our Privacy Policy and privacy issues to:

**Attn: Euro-Center Sydney Privacy Officer:**

Phone: + 61 2 8274 5700

Fax: + 61 2 9884 9947

Email: [sydney@euro-center.com](mailto:sydney@euro-center.com)

Post: Privacy Officer

Euro-Center Sydney Pty Ltd

Level 8, South Tower, 1-5 Railway Street

Chatswood NSW 2067

If your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au) and on 1300 363 992

## Last updated April 2016

Euro-Center Sydney Pty Ltd (A.B.N. 86 064 798 607)

Euro-Center Sydney Pty Ltd is part of the Euro-Center Organization and our head office is Euro-Center Holding SE located in Prague, Czech Republic. [www.euro-center.com](http://www.euro-center.com)

