

Privacy Policy (Australia)

About Us

We are Benestar Group Pty Ltd (ACN 003 536 472) (formerly known as *Davidson Trahaire Corpsych Pty Ltd*), part of the Cover-More group of companies, wholly owned by Zurich Insurance Group Limited.

We provide a range of workforce health and wellbeing services to organisations. These services include Employee Assistance Program services, trauma counselling, HR consulting, health risk assessments and organisational development (coaching, training and facilitation) services.

In conducting our business, we collect, use and disclose personal information. We understand the importance to you of maintaining privacy in relation to the information we hold.

This Privacy Policy sets out how we comply with our obligations under the *Privacy Act 1988* (Cth) and other relevant legislation in managing your personal information.

What information do we collect and hold?

The types of personal information we may collect and hold about includes:

Identity	Billing and administration	Health
<ul style="list-style-type: none">NameResidential addressDate of birthSexEmail addressPhone numberWhether or not you are Aboriginal or Torres Strait Islander	<ul style="list-style-type: none">Employer/sponsoring organisationEmployer business unitEmployment location	<ul style="list-style-type: none">Reason for assistanceHealth/personal historyCase notes concerning the services we provide youEmergency contact details

We will only collect information about you to the extent it is necessary for us to provide services to you or is otherwise necessary for us to perform one or more of our functions.

How do we collect and hold information?

Normally, we will collect your personal information directly from you. We do this when you:

- Contact our contact centre
- Request services electronically via email, our website or web portal or our online chat facility
- Attend an appointment with one of our clinicians or otherwise participate in a service (whether in person or by telephone or video teleconference)

We may also collect information about you from your employer. We do this when your employer considers that you are at risk or otherwise considers that you may benefit from services we offer.

Normally, the only information we collect from your employer in these circumstances is your name, contact details and a high-level understanding of why your employer considers that you will benefit from our services.

When you first make contact with us, or we with you (where your employer asks us to contact you), we create a unique digital record for you. We, and our contracted professionals, may also keep physical records in relation to the services we provide. Each time a service is provided to you, new information is added to your record. As we inform you when you call our contact centre, your calls with us may be recorded for training, quality and business purposes and form part of your electronic record.

We take reasonable technological and organisational steps to protect the information we hold about you from misuse, interference and loss and also from unauthorised access, modification and disclosure.

Why do we need your personal information?

1. To provide you services

We collect and use information about you in order to provide relevant services to you and to best ensure that you get the services and care you need.

We need to keep records of the services we provide to assist the professionals involved in the provision of the services with managing and improving the services provided to you. We are also required to maintain records of all health-related services we provide you for legal and ethical reasons. We keep your records for as long as we need to, to comply with our obligations.

Most services we provide you are provided in confidence and we will not notify your employer or sponsoring organisation that you have received services from us or anything disclosed in the course of providing those services. Some services we provide you at the request of your employer will be provided on the basis that information concerning the services will be shared with your employer. We will obtain your consent and notify you of what information will be shared when this is the case.

Our services are provided by a network of qualified professionals (including psychologists, social workers and counsellors). Our network is made up of a mix of employees and independent contractors. One reason we use independent contractor professionals is to best ensure that we can connect you with the professional that best suits your needs and is as conveniently located for you as possible. We exchange information about you and the services provided to you with these independent contractors. We ensure that all independent contractors in our network are bound by legal and ethical obligations of confidentiality in respect of your information.

We may provide your information to other persons who are involved in your care (such as clinicians, medical practitioners, specialists and hospitals). We will inform you before we do this (except in the case of an emergency).

We may disclose information to someone who is not involved in providing services to you:

- if you are a minor (for example, to a parent or guardian);
- if we are required or permitted by law; or
- if you consent.

If you are contacting us or receiving assistance from us and you or someone else are at possible risk of harm, we have an obligation to intervene and provide the appropriate escalation. This may take the form of liaising with a third party (for example, a medical practitioner, family member, manager or colleague) or, in certain circumstances, contacting emergency services.

2. Operating our business

We use your information as necessary to manage our accounts and to obtain payment for the services we provide. We do not provide information which specifically identifies you to your employer or sponsoring organisation in connection with a request for payment for confidential services we provide you.

We may use your information (but not your identity) to monitor and improve the services provided by us (and our contracted professionals), the products we provide or our operations generally.

In order to meet our contractual obligations to your employer/sponsoring organisation, we may provide reports to those organisations which includes information we collect from you. This information is reported on a de-identified basis and is used by your employer/sponsoring organisation to monitor organisational trends relating to the health and wellbeing services we provide.

We may use your information to contact you in relation to the services we provide you (for example in relation to scheduling appointments). We will not contact you for marketing purposes unless you have given your consent.

Do we transfer your personal information overseas?

If you are located within Australia, we do not transfer identifiable information about you outside of Australia.

If you are located outside Australia, normally we will arrange for a local contractor to provide services to you on our behalf. In most cases, you will be automatically directed to the local contractor in your country or region. If you contact us directly, we will either give you the contact details for our local contractor or take enough information from you and give that information to our local contractor to allow our local contractor to contact you. These contractors are responsible for complying with local privacy laws in relation to the information they obtain from you.

If you are located outside of Australia at the time we provide services to you from Australia (for example when we provide you services by telephone or live chat), we will keep records of those services in Australia.

Accessing, updating and correcting your information

You may request access to the information we hold about you. You can also request that corrections be made to that information. We will respond to your request within a reasonable time.

There are some circumstances where we are not required to give you access to or allow you to correct your information. We will normally give you notice setting out reasons for not complying with your request and informing you of how you can complain about our refusal.

There is no fee payable for requesting access to your information or for us to make corrections. However, we may charge you a fee for our costs of collating and providing you with access to your information. The fee is payable before access is given.

Making a privacy complaint

If you have any concerns about how we handle your personal information or you wish to make a complaint on the basis that you consider we have breached the Australian Privacy Principles prescribed under the *Privacy Act 1988* (Cth), please contact us. If you would like to make a complaint, you will need to send us your complaint in writing (see details below).

We will endeavour to respond to your complaint within a reasonable time after it is made.

How to contact us

Benestar Group Pty Ltd

Customer Service

Private Bag 913
NORTH SYDNEY NSW 2059
Email: info@benestar.com
Phone: 1300 360 364

Privacy Officer

Private Bag 913
NORTH SYDNEY NSW 2059
Email: privacyofficer@benestar.com
Phone: 1300 360 364

You can also contact the Office of the Australian Information Commissioner if you wish to make a complaint:

Office of Australian Information Commissioner

GPO Box 5218
SYDNEY NSW 2001
Phone: 1300 363 992
Web: www.oaic.gov.au

Your privacy on the internet

We may also collect non-personally identifiable information such as the type of browser, or operating system you use, your domain name, IP address, access times, referring website addresses and page views. Our Internet Service Provider (ISP) automatically identifies your computer by its IP address. When you visit pages on our website, our ISP may log your IP address. We do not link IP addresses to any personally identifiable information.

Your IP address is used to gather broad demographic information only. A User Transaction ID is created each time you enter our website. This ID is used to keep track of your dealings with us, and other requests.

Cookies

We do not use cookies to collect information which can personally identify you. A cookie is a small, text-based file used frequently on some websites and portals. They are designed to assist and streamline the exchange of information between your computer's browser and our computer systems. Other cookies we use collect information about the use of our websites. The information collected includes where visitors connect from, what version of browser they use and their path through the site. It helps us to provide personalised features and keep our content fresh and relevant. If you do not want information collected through the use of cookies, you can configure your cookie preferences and options through your browser.

Web beacons

Our web pages may contain electronic images, known as web beacons or spotlight tags. These enable us to count users who have visited certain pages of our website. Web beacons and spotlight tags are not used by us to access your personal information, they are simply a tool we use to analyse which web pages customers view, in an aggregate number.

Links to other websites

Our web sites may contain links to non-Group web sites. Whilst such links are provided for your convenience, you should be aware that the information handling practices of the linked web sites might not be the same as ours.