

Privacy Policy

About us

The MDA National Group is made up of MDA National Limited and MDA National Insurance.

This policy applies to MDA National Limited ABN 67 055 801 771 (MDA National) and to all of MDA National's subsidiaries including MDA National Insurance Pty Ltd ABN 56 058 271 417, AFS Licence No. 238073 (MDA National Insurance) and MDA National Insurance's authorised representatives.

Within this policy, 'we', 'our' and 'us' means the MDA National Group.

Commitment

Your privacy is important to us. We are committed to the open and transparent management of the personal information we hold.

Each entity forming part of our Group supports and is bound by the Australian Privacy Principles ('APPs') contained in the *Privacy Act 1988* (Cth), as amended.

Personal information

Personal information is information or opinions 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.

Sensitive information

Sensitive information includes, amongst other things, information about an individual's health, genetics, religious beliefs and criminal record. In this policy, a reference to personal information includes sensitive information.

Purpose of the policy

This policy outlines how we collect, disclose and manage personal information in accordance with the APPs. **The policy is effective from 8 June 2019.**

What kinds of personal information are collected and held by us?

We may collect and hold personal information including but not limited to personal information about:

- current, past and potential Members of MDA National (Members);
- clients or former clients of MDA National Insurance or its authorised representatives (Insureds);
- authorised representatives of MDA National Insurance;
- staff of Members or Insureds;
- patients of Members and Insureds;
- any individual connected with a claim against our Members or Insureds or past Members or Insureds;
- MDA National Group suppliers and their employees; and
- prospective employees and contractors.

The type of personal information we may collect and hold includes (but is not limited to):

- names, addresses, contact details, date of birth, signatures, qualifications, credit card and direct debit details, health information (if applicable), billings information, practice details, insurance and claims histories of Members or Insureds;

- relevant opinions or determinations in relation to Members or Insureds in the event of an incident report made to us;
- names, addresses, dates of birth, medical details and other information about patients and others who are involved in an incident which has given rise, or may give rise to a complaint, claim, investigation or inquiry involving Members or Insureds; and
- at times, the names, addresses, dates of birth, health information and other information about relatives of the patients of Members or Insureds.

How is personal information collected and held?

We collect personal information in a number of ways:

Personal information provided directly

We will generally collect personal information by way of forms filled out by Members or Insureds (or staff of Members and Insureds), face-to-face meetings, interviews, telephone conversations, correspondence (including e-mails), our website, social media or other digital platforms.

Personal information provided by other people

In some circumstances we may be provided with personal information from a third party, for example, health information provided by our Members and Insureds about their patients or Members and Insureds' information provided through a broker or our authorised representatives. We may also obtain information about you from other insurers when, for example, we need to obtain details of prior claims. We only collect this information if you have given your consent, or would reasonably expect us to collect the information in this way or if it is necessary for a specific purpose such as the investigation of a complaint or a claim.

We hold personal information in physical or electronic form. Electronic data is stored on our systems or on systems owned by third parties.

Security of personal information

We treat personal information as strictly confidential and take reasonable steps to protect personal information held by us from misuse, loss, unauthorised access, modification or disclosure (for example by use of physical security and restricted access to electronic records through use of passwords). When no longer required we destroy or delete the information in a secure manner.

We have an obligation to notify you and The Office of the Australian Information Commissioner (OAIC) if your personal information is involved in a data breach that is likely to result in serious harm. The notification will include recommendations about the steps you should take in response to the breach.

Why is personal information collected and held?

We collect and hold personal information in order to conduct our business of providing assistance, medico-legal advice, education, services and insurance.

If personal information we request is not provided, we may not be able to supply the relevant product or service to you.

In any particular circumstance if you choose not to provide us with requested information we will advise you of any consequences of failing to supply us with that information.

Anonymity and use of pseudonyms

You may be able to make general enquiries about, or comment on, our services without identifying yourself or by using a pseudonym. However, in most circumstances, including seeking a quote, you will need to identify yourself.

How might personal information be used?

In general, we use the personal information we collect to:

- provide assistance, services and insurance to Members and Insureds;
- administer our products and services;
- provide educational material and training to Members and Insureds;
- act on behalf of Members and Insureds in respect of claims made against them;
- communicate with Members or Insureds;
- obtain and maintain reinsurance;
- administer government schemes such as the Premium Support Scheme and the Run-Off Cover Scheme;
- market our products and services;
- conduct market research to better understand the needs of our Members and Insureds; and
- help manage and enhance our services.

We will only use your personal information for the specific purpose it was given or for related purposes for which you would reasonably expect it to be used. Sensitive information will only be used for the directly related purposes it was given.

Marketing

From time to time, we may use your personal information, including your contact details (but never any sensitive information), to tell you about products, services, upcoming events, offers and competitions which we think may be of interest to you. To do this, we may contact you by telephone, email, SMS, mail or social media. In particular, we may contact you about products and services we think may be of interest to you after you cease to hold an insurance policy or Membership with us, for example, about applying for a new policy, renewing your old policy or to update you on any changes to the product and/or its pricing.

Unless you choose to opt out of receiving marketing material from us, we will consider that you consent to this type of communication. In order to opt out, you are welcome to contact us at any time or follow the opt-out instructions in the relevant marketing communication. Simply request that you do not want us to use or disclose your personal information for marketing purposes. We will process your request as a matter of priority and apologise if you receive any marketing material during the intervening period from the receipt to the processing of your request.

To whom might personal information be disclosed?

We may disclose personal information to:

- companies, firms or individuals who assist us in the administration of our business or in providing services or who perform functions on our behalf, including but not limited to reinsurers, insurance brokers, medical specialists, actuaries, auditors, accountants, legal advisers, IT contractors, network providers, mailing houses and our authorised representatives;
- staff of Members or Insureds who assist in the running of the practices of Members or Insureds;
- courts, registration authorities, complaints, commissions, boards and tribunals;
- government departments and bodies to whom we are obliged by law to disclose certain information;

- government departments and bodies to whom we have informed you we will disclose information; and
- anyone else to whom you authorise us to disclose information.

We take precautions to ensure third parties are aware of their privacy obligations and that they are required to comply with these obligations.

We may also collect personal information from these organisations and individuals, and deal with that information in accordance with this policy.

Personal information collected by one entity within our Group may be disclosed to other entities within our Group.

Sending information overseas

We take privacy seriously and are committed to ensuring the protection of your personal information, no matter where you are located.

We may disclose personal information to reinsurers, insurance brokers or others who assist us to manage or administer our business located outside Australia. The types of personal information that we may send overseas are outlined in this policy, including but not limited to information on claims, cases and Insureds.

We currently send personal information to the following countries: United Kingdom, United States of America, Canada, New Zealand, Singapore, India, Switzerland, Germany and other EU countries. Countries may vary from time to time.

We take reasonable steps to ensure that we and such recipients respect your privacy by abiding by the APPs or equivalent privacy laws of each relevant jurisdiction.

Access and correcting personal information

We endeavour to ensure that the personal information we hold is accurate, complete and up-to-date. This includes updating your personal information when you advise us of changes.

You may seek access to the personal information we hold about you or request changes to that personal information by contacting our Privacy Officer whose contact details are provided within this policy.

We may charge you a fee for any of our associated costs with providing you with access to your requested information. Should this apply, you will be advised of the likely cost in advance. We will, so far as we are able, provide the requested information within 15 working days of receiving your written request.

Personal information will not be provided if, as is permitted under the APPs, your request is frivolous or vexatious; or if giving access would be unlawful or if in our reasonable opinion, to do so would result in serious threat to the life or health of any person or to public health and safety. In circumstances where we do not provide personal information or agree to requested changes we will provide a written notification to you explaining our reasons for the decision.

Website

This policy applies to personal information collected through our website.

We use cookies for secure services (that is, an area where you are required to login) on our website. These cookies are used for a variety of purposes, including for security and personalisation reasons.

For the convenience of visitors to our website, links are sometimes provided to other websites. These sites are not under our control and, as such, we are not responsible for any personal information that may be collected through your use of those websites.

Complaints

If you wish to make a complaint about our privacy practices, including a breach of the APPs or any relevant APP codes, you should first contact our Privacy Officer with the details of your complaint. We undertake that your complaint will be investigated diligently and our response provided to you as soon as reasonably practicable.

If you feel that we have not handled your complaint adequately you have the right to complain to the Office of the Australian Information Commissioner (OAIC). A complaint to the OAIC must be made in writing.

If you require assistance you can contact OAIC staff by ringing the Information Commissioner's hotline service on 1300 363 992 or via email to enquiries@oaic.gov.au. You may also obtain information about the complaint process from the OAIC's website at privacy.gov.au/complaints or by writing to:

Director of Compliance

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

Changes to this Privacy Policy

We may amend this policy at any time as required by our business needs or legislative changes. We will notify you of such changes by posting an updated version of the policy on our website with the amendments taking effect from the date of publication on the website.

How to contact us or to obtain a copy of this policy

The most current version of this policy can be obtained by contacting our Privacy Officer or by visiting our website mdanational.com.au.

If you have any questions about privacy-related issues please contact:

The Privacy Officer

E-mail: privacy@mdanational.com.au
Phone: (08) 6461 3400
Facsimile: (08) 9415 1492
Postal address: PO Box 445
West Perth WA 6872



Registered Office: MDA National, Level 3, 88 Colin Street, WEST PERTH WA 6005