

Seasons Living Australia recognises that privacy is very important and we are committed to protecting the personal information we collect from our employees and from our clients. *The Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**), the Retirement Villages Act 1999 (Qld) and the Retirement Villages Regulation 2010 (Qld) govern the way in which we must manage your personal information and our Privacy Policy sets out how we collect, use, disclose and otherwise manage personal information.

This Policy applies to all staff (including contractors and volunteers).

By visiting our website, using any of our services or otherwise providing us with your personal information (or authorising it to be provided to us by someone else), you consent to your personal information being handled by us as set out in our Privacy Policy.

Purpose of the Policy

The Seasons Privacy Policy explains how we collect, store, and use information we may have recorded about you. It also details how we disclose, and give you access to, the same information. The aim of this Policy is to -

- ensure personal information is managed in an open and transparent way;
- protects the privacy of personal information including health information of clients, residents and staff;
- provides for the fair collection and handling of personal information;
- ensures that personal information we collect is used and disclosed for legally permitted purposes only;
- regulates the access to and correction of personal information; and
- ensures the confidentiality of personal information through appropriate storage and security.

The personal information that we collect and hold about you, depends on your interaction with us, either as an Employee or as a Client. We will take such steps as are reasonable in the circumstances, to ensure that the personal information we collect is accurate, up to date and complete.

Generally, we will collect, hold and use your personal information (including sensitive information) for the purpose of:

- facilitating our internal business operations, including the fulfillment of any legal requirements;
- identification; and assessment of required Services;
- providing Services to you or someone else that you know;
- providing you with information about Services that we, or our related entities and other organisations that we have affiliations with, offer (if you consent to receiving these); and
- analysing our services and customer needs with a view to developing new or improved services.

This Policy also informs Employees, Clients, and all other persons whose information is collected when dealing with Seasons, how they can access their personal information, correct the personal information held by us, lodge complaints or make any other related enquiries.

Type of Information we collect

There are two classes of information defined under the Privacy Act – personal information and sensitive information, the latter of which includes health related information.

Seasons will only collect either type of information if it is deemed reasonably necessary for our business needs and activities.

Personal information includes your contact details, information necessary for the payment of regular charges and services provided by us to you, and any other information necessary for our administration and effective business planning.

The Privacy Act defines "personal information" to mean information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent or can be reasonably ascertained, from the information or opinion.

Sensitive information may include health related information, religion, race, or ethnic origins. We will not collect this information without consent from you. We may seek to collect this information where we provide, or propose to provide, health or community care related services to you.

Sensitive information is a subset of personal information. It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of political organisations, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information about an individual.

In general, we limit the collection of sensitive information because such information is not usually necessary for what we do.

We do not share that information other than within the terms of the consent given by you, or where an exception exists and we are able to do so; for example, in a medical emergency.

How we collect your information

Seasons collects personal information (but not sensitive data) about people from a variety of sources. This includes, but is not limited to, Sales and Marketing, Business Development, Village Operations and Human Resources.

We will generally collect your personal information directly from you through the use of any of our standard forms, in person during a consultation, over the internet, via email, or telephone conversation. There may, however, be some instances where we collect your personal information from someone else because it is unreasonable or impractical to collect it directly from you. In such a case, we will take reasonable steps to notify you of this in advance, or where this is not practicable, as soon as reasonably practicable after your personal information has been collected.

If you do not consent to us collecting health or other sensitive information then we will not be able to do so, unless an exception applies. An exception may occur in the case of an emergency, where the collection of such information without a permission being reasonably obtained may reduce the risk to health, safety, or pose a life-threatening situation. Alternatively, where collection of information is authorised or required under Australian law.

Internet Users

If you access our website, we may collect additional personal information about you in the form of an IP address and domain name. Our website may contain links to other websites. We are not responsible for the

privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

What do we do with your information?

Seasons will only use your personal information for the reasons we collected it or allied purposes as explained in the Privacy Policy. For residents living in Seasons retirement villages, we collect and use personal information so that we can effectively manage our retirement villages. Examples of how the privacy information we collect, hold and use are shown below;

- The verification of your identity
- Your purchase, occupation or visitation of the one of the Villages
- To keep a resident personal information record to assist us in contacting you as required
- the administration and management of our services, business systems and infrastructure;
- To advise nominated next of kin or representatives authorised by you, of an emergency medical situation so that support can be provided
- To keep records of accidents or injuries in the village that you or others report to us for WHS review and insurance purposes
- To collect and store your bank account details so that we can arrange direct debit of your monthly fees and other charges authorised by you for collection
- To assist Seasons in the future planning of its business model
- To include, with your permission, your contact details in the village's resident directory so other residents may contact you directly.
- the resolution of complaints made by you, or against you, by other residents (we may disclose the contents of any complaints made by you to the persons (if any) that are the subject of the complaint:
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- any other matters reasonable necessary to manage and administer the Villages and comply with our obligations under the Retirement Villages Act (Qld) 1999

Use & Disclosure of Information

Seasons will not use collected information other than for the purposes defined in the Privacy Policy. Occasionally it may be necessary to pass information to external professionals and contractors. Where personal information is passed to a third-party we will take all reasonable steps to ensure the information is treated in accordance with Australian Privacy Principles guidelines, and that confidentiality of your information is maintained.

Seasons undertakes to only use your information –

- when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose;
- if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
- if we have reason to suspect that unlawful activity has been, or is, engaged in: or
- if it is required or authorised by law.
- In the event we propose to use or disclose such personal information other than for reasons in above, we will first seek your consent prior to such disclosure or use.

If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact your Village Manager and we will ensure the relevant communication ceases.

Any other use or disclosure we make of your personal information will only be as required by law or as permitted by the Privacy Act (Cth) 1988, by this Privacy Policy or otherwise with your consent.

Seasons is unlikely to disclose your personal information to overseas recipients, except where exceptions apply or if required under Australian law.

We will not sell your personal information to other groups or organisations.

Safety of Privacy Information

Seasons holds personal information via a combination of physical records and electronic database storage. The physical records are safely kept within secure office areas and accessed by authorised Seasons office staff who are trained and familiar with our privacy policies and procedures. Personal information stored by electronic means is protected by electronic security and software.

We take all reasonable steps to ensure that the personal information we hold is protected against misuse, loss, unauthorised access, modification or disclosure.

Non-current information is archived in secure premises in accordance with our Information Retention Policy.

However, we cannot guarantee the security of any personal information transmitted to us via the Internet.

Maintaining the quality of Personal Information

We seek to ensure through all reasonable means, that the personal information we collect, store and use is accurate and up to date.

If at any time we become aware that the information we hold is inaccurate or misleading, or you ask us to correct or update any information held, we will take all reasonable measures to rectify and ensure the information we hold is correct and accurate and does not misinform or mislead.

If a request to correct information held by us is refused, we will give you the reasons for our refusal and provide information on our complaints process should you wish to formally lodge a concern about our decision.

Accessing information

If we hold information about you then you are entitled, at any time on formal request, to ask for access to that information. We will respond to any requests in both a reasonable and practicable manner and time period. We are entitled to make a reasonable charge for providing access to your information.

To obtain access to your personal information, you will have to provide us proof of identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected. We will take all reasonable steps to provide access to your personal

information within 30 days from your request. In less complex cases, we will try to provide information within 14 days.

If access to your information is refused we will provide a written explanation of the reasons for our decision and details of our complaints procedure if you wish to lodge a formal objection about our refusal.

If providing you with access requires a detailed retrieval of your personal information, a fee may be charged for the cost of retrieval and supply of information.

Lodging a complaint

If you have a complaint about a possible breach of Seasons' Privacy Policy, or of the Australian Privacy Principles on which this policy is based, you should contact the Seasons Living Australia Privacy Officer. Your concerns will be investigated and we will formally respond with the results of our investigations.

When you write to us you should provide;

- a brief description of your privacy concern
- what actions that you and we have taken to resolve your concern this far
- copies of any relevant documents and letters

We must respond within a reasonable time frame. If we take longer than 30 days to respond to your complaint, or if you do not agree with our decision, you can forward your concern to the Australian Privacy Commissioner. Further details can be found at www.oaic.gov.au

In most cases, please contact your Village Manager first and discuss the issues with them. If you wish to take the complaint further then please contact us via:

(i) Seasons Living Australia Privacy Officer:

Phone: 1300 506 116

Fax: 07 3205 9275

Email: privacy_officer@seasonsagedcare.com.au

(ii) Office of Australian Information Commissioner

Online: <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

By phone: on 1300 363 992

By fax: on 02 9284 9666

In writing:

(i) Seasons Living Australia Privacy Officer:

PO Box 6028

Brendale QLD 4500

(ii) Office of Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001