



## Privacy Policy

### **When does this policy apply?**

This policy sets out the principles that Aveo Group Limited and its subsidiaries (**Aveo/we/us/our**) adopt in the conduct of our business in order to protect your personal information. A number of our subsidiaries engage in activities under other brands, including the 'Aveo Live Well' brand. You can contact the Aveo Group Privacy Officer or your village/facility manager to verify the details of the corporate group entity that this policy applies to. You can obtain a copy of this policy from our website at [www.aveo.com.au](http://www.aveo.com.au) or by contacting our Privacy Officer whose details are set out below.

### **What does this policy deal with?**

This policy deals with our collection, use and disclosure of, and your access to, information we may have recorded about you. We are firmly committed to protecting your privacy. We aim to maintain a safe and secure system of handling your personal information, whilst still providing access to your personal information when required. For this reason, we aim to ensure that your personal information is handled in strict compliance with the Australian Privacy Principles (**APPs**) which are part of the Commonwealth *Privacy Act 1988*.

### **What is personal information?**

Personal information for the purposes of this policy and the APPs is information or an opinion (whether true or not and whether recorded in a material form or not) about an individual whose identity is identified or is reasonably identifiable.

### **How do we collect personal information?**

Whenever it is reasonable and practicable to do so, we collect personal information about you directly from you. Occasionally, we may receive information about you from third parties, but if we do so we will use reasonable steps to inform you of who we are, the reason why we are collecting your personal information and the consequences if we do not receive that personal information. From time to time we may also collect information about you or disclose information about you to a family member nominated by you or someone that is appointed as your personal representative, attorney or legal representative. We ask you to keep us informed of any nominations or appointments in this respect.

### **What personal information do we collect, hold, use and disclose and why?**

We only collect, hold, use and disclose personal information about you that is necessary for us to carry on our business functions. The information we collect, hold, use and disclose depends upon the nature of our dealings with you. This may include information such as your contact details, information to assist in the resolution of complaints and information about payment for services.

For example, when you apply to live in one of our retirement villages or to receive nursing or aged care services from us we will collect, hold and use information about you. In most cases the information is collected in a written application form that we will ask you to complete. Initially we use certain of this information to consider your eligibility for residency or to receive nursing or aged care services from us. We also need this information to provide services to you and to administer our aged care and retirement village facilities. If you do not provide this information to us we may not be able to consider your application or we may not be able to provide you with some or all of the services for which you have applied. We may also collect additional personal information on an ongoing basis for the purpose of providing services to you or for the administration of our facilities.

## **Sensitive information (including health information)**

We do not generally collect sensitive information about you unless required by applicable laws or rules or the context requires us to do so. Sensitive information includes information about race, political or religious beliefs, sexual preferences, criminal convictions and health information. We collect health information where we provide or propose to provide nursing and/or aged care services to you. We ask for your consent for us to collect this sensitive information. We also collect with your consent health information about you if you are a resident or prospective resident of one of our retirement villages to ascertain your eligibility for residency from time to time. We do not use or share that information for any other purpose or disclose it to any person other than in accordance with the terms of any consent that you provide to us or where we are permitted to do so by the APPs. For example, we may provide health information held by us to a medical practitioner or hospital in a medical emergency.

## **How do we hold personal information?**

We will hold your personal information through a combination of physical records and electronic storage on databases. We will take reasonable steps to protect the information from misuse, loss or unauthorised access, modification or disclosure both physically and through computer security methods.

We will keep your personal information for the minimum time required by applicable laws after the end of our relevant dealing with you, for example when you depart one of our villages or close a transaction with us.

## **Use and Disclosure of Personal Information**

We will only use your personal information for the reasons we collected it or for purposes set out in this policy. These reasons and the parties to whom we might disclose it will be reasonably apparent to you when we collect your information and our use and disclosure of that information will only be for our business activities. From time to time we may disclose information to an external contractor or professional adviser. We are not likely to disclose your personal information to an overseas recipient. Where personal information is disclosed to any third party we will take reasonable steps to ensure that the person receiving your personal information keeps it confidential and does not misuse it or improperly disclose it to any other person.

Personal information may be shared between different entities within Aveo Group but where this occurs the principles contained in this policy will continue to apply to it.

We may use personal information to send you information about other Aveo Group products and services which may be of interest to you, but we respect your right to ask us not to do this. If you no longer wish to receive those sorts of communications from us, you should contact our Privacy Officer and we will ensure that this is corrected. If we undertake direct marketing we acknowledge that we are bound by the *Spam Act 2003* and the *Do Not Call Register Act 2006*.

Any other use or disclosure we make of your personal information will only be as required by law or permitted by the *Privacy Act 1988*.

We will not sell your personal information to other organisations.

## **Data Quality and Security**

We will take all reasonable steps to:

- make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
- protect the information from misuse, loss or unauthorised access, modification or disclosure both physically and through computer security methods; and
- destroy or permanently de-identify the information if it is no longer needed for any purpose.

## **Cookies**

A cookie is a small data file that may be placed on the computer of a web user (usually in the browser software folder) the first time a computer visits a web site which operates cookies. Cookies are necessary to facilitate on-line transactions and ensure security. If you do not wish to receive any cookies you should set your browser to refuse cookies. We do not use cookies to keep personal profiles of our clients' use of our website at [www.aveo.com.au](http://www.aveo.com.au).

## **Access to and correction of your Information – Residents**

If you are a resident of one of our retirement villages or aged care facilities and you want to access, correct or raise a query or concern about the personal information we hold about you, then we recommend that you contact the manager of your village or facility. He or she should be able to address your concerns. The APPs give rights to access and correct personal information that we hold about you in certain circumstances and we will observe these rights. We will advise you in writing if a correction request is refused and will include in this advice the information required by the APPs.

## **Access to and correction of your Information – Persons other than residents**

If you are not a resident and you want to access, correct or raise a query or concern about the personal information we hold about you, you believe any personal information that we have about you is inaccurate or out-of-date, or you are concerned about the way we have handled your personal information then please contact our Privacy Officer. The APPs give rights to access and correct personal information that we hold about you in certain circumstances and we will observe these rights. We will advise you in writing if a correction request is refused and will include in this advice the information required by the APPs.

## **How can you make a complaint?**

If you have a complaint about a suspected breach of the APPs then you should put your complaint in writing and send it to the Privacy Officer. We will review and respond to your complaint within a reasonable timeframe by either:

- accepting your complaint in full; or
- accepting your complaint in part and rejecting it in part; or
- rejecting your complaint in full.

If we are unable to determine whether to accept or reject your complaint, for example because we need more information from you or a third party, we will advise you of this and advise you when we anticipate being in a position to make a determination.

If we accept your complaint, whether wholly or in part, and as part of the resolution restitution is required to be made to you, we will arrange for the restitution to be made promptly after accepting your complaint.

If we reject your complaint, whether wholly or in part, we will give you written reasons for the rejection, together with notice setting out the rights and options that are available to you should you wish to pursue the complaint further.

If you are not satisfied with our response to your complaint there is a process for complaints to be made to the Australian Federal Privacy Commissioner.

## **Privacy Officer Details**

You can contact the Aveo Group Privacy Officer as follows:

Telephone: (02) 9270 6100

Facsimile: (02) 9270 6199

Address: Level 5, 99 Macquarie Street, Sydney, NSW, 2000

### **Additional Information on Privacy**

For further information on Australian Privacy laws, please visit the Australian Federal Privacy Commissioner's web site at [www.privacy.gov.au](http://www.privacy.gov.au).

### **Review of and updates to this policy**

We will review this policy on a periodic basis and the current version will be made available on our website at [www.aveo.com.au](http://www.aveo.com.au).

***This Policy was approved by the Board on 12 February 2014***