

Document reference:	Privacy Policy
Approved by:	Chief Executive Officer
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This privacy policy (**Privacy Policy**) sets out how Harbison Memorial Retirement Village ABN 23 001 507 624 and its related bodies corporate (as defined in the *Corporations Act 2001* (Cth)) (**we, our, us**) collects, stores, uses, protects, shares and discloses your personal information.

This Privacy Policy applies to our website located at harbison.org.au (**Website**) and our related aged care and other care services, products, social media pages, tools and applications (together our **Services**). By visiting or using the Website or participating in our Services you agree to the collection, storage, usage and disclosure of your personal information by us in the manner described in this Privacy Policy.

1. Types of Personal Information we collect

As part of delivering our Services we may collect personal information about you as defined under the *Privacy Act 1988* (**Privacy Act**). We will only collect personal information where it is reasonably necessary for the performance of our functions or activities. The personal information we collect may include the following:

- **Details about you:** this includes information that we collect about you that will assist us in delivering our Services to you. The information we collect includes your first name, last name, date of birth, and contact details. If you are interested in our Services, or otherwise engage us to provide our Services to you (for example, if you are a resident at our retirement village or have submitted an application to become one) then we will also collect:
 - information to verify your identity (if required);
 - information about your health and wellbeing, including health conditions or disabilities you may have;
 - information about aged care or other care services that you are provided or have been provided;
 - information about your family members or authorised representatives;
 - billing details;
 - personal preferences; and
 - any other additional information you provide to us directly or indirectly through your use of the Website or our Services. We use such information to assist in providing our Services to you.

Some of the above information collected, such as the health information identified above will be sensitive information as defined under the Privacy Act. Please see the section titled [Sensitive Information](#) below for further information. If you are a family

member or authorised representative of a care recipient, we may collect your name and contact details.

- **Financial information:** this includes information such as payment card details and bank account details. We use this information to send to our third-party payment gateways when you make payment for our Services.
- **Website use information:** When you use our Website, for example when you contact us, we collect information that enables the Website to be able to run.
- **Marketing use information:** this includes information provided to us using a marketing or newsletter sign up form.
- **Surveys:** information in connection with client surveys, questionnaires and promotions.
- **Other information we collect related to your use of the Website:** your device identity and type, I.P. address, geo-location information, page view statistics, advertising data and standard web log information and any other information provided by you to us via our Website or our online presence, or otherwise required by us or provided by you.

Sensitive information

As part of delivering our Services, we may also collect health and sensitive information about you as defined under the Privacy Act. The sensitive information we collect may include the following:

- health information including history and reports (if required to process your request for Services);
- your care needs, records of care assessments, test results, health plans and manager/support coordinator details, including family members and authorised representatives; and
- any other sensitive information provided by you or a third party to us via our Services.

Sensitive information is subject to a higher level of privacy protection than other personal information and is handled by us in the following ways:

- sensitive information will only be collected with consent, except in specified circumstances under the Privacy Act or it is otherwise required by law;
- sensitive information will not be used or disclosed for a secondary purpose unless the secondary purpose is directly related to the primary purpose of collection and within the reasonable expectations of the individual, or otherwise in specified circumstances under the Privacy Act or it is otherwise required by law;
- sensitive information will not be used for the secondary purpose of direct marketing;
- before we disclose sensitive information overseas, we will take reasonable steps to ensure that recipient does not breach the Australian Privacy Principles in relation to that information; and
- sensitive information will not be shared by related bodies corporate in the same way that we may share other personal information.

2. How we collect Personal Information

We may collect personal information either directly from you, or from third parties, including where:

- you register or sign up to our Services either as a client or resident/care recipient;
- you provide information directly to us through our Services, our Website or on a hardcopy form;
- you use the Website generally including during the provision of Services;
- you subscribe to any of our newsletters;
- you contact us through our Website, in person, by phone or in writing;
- you submit any of our online forms;
- you deal with us generally via email, telephone, SMS, social applications (such as LinkedIn, Facebook or Twitter) or otherwise;
- you interact with our Website, social applications, Services, content and advertising; and
- you invest in our business or enquire as to a potential purchase of our business.

We may also collect your personal information from third parties including:

- referral agencies;
- organisations that assess health status or care requirements involved in your care or treatment;
- a health practitioner or other health professional involved in your care or treatment;
- responsible persons and family members of yours;
- government agencies and insurers;
- third parties who produce any content, advertising, and marketing campaigns for us that you may interact with; and
- our other service providers and publicly available sources.

Where possible, we collect your personal information directly from you. However, there may be occasions when we collect personal information (including sensitive information) about you from someone else. For example, your nominee, support coordinator, plan manager or representatives may provide information about you in an application for you to receive our Services.

If you are providing personal and/or sensitive information on behalf of someone else, you must have the consent of that person to provide their personal and/or sensitive information to us to be collected, used, and disclosed in accordance with this privacy policy. This includes where you are a participant's nominee, support coordinator, plan manager or representative. We reserve the right to request evidence of this consent.

Where we collect your personal information from a third party, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party. By providing personal information about another person to us, you represent that you are legally permitted to do so, and we will not be responsible for verifying any such authorisation.

Cookies & data tracking technologies

We may also collect personal information from you when you use or access our Services or our social media pages. This may be done through use of web analytics tools, 'cookies' or other similar tracking technologies that allow us to track and analyse your Services usage. Cookies are small files that store information on your computer, mobile phone or other device and enable and allow the creator of the cookie to identify when you visit different websites. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience of the Service. Persistent cookies can be removed by following Internet browser help file directions. Cookies may enable automatic logins when you visit in the future and may enable content customisation.

We may also use third party vendor tracking cookies, including:

- Google Analytics and AdWords tracking cookie; and
- Facebook pixels; and
- Mailchimp pixel and tracking cookie.

You can opt out of Google's use of cookies or device identifiers by visiting Google's Ads Settings. Alternatively, you may visit the Network Advertising Initiative opt-out page or control the use of device identifiers by using your device's settings.

Third parties as set out above may use cookies, web beacons, and other storage technologies to collect or receive information from the Service and elsewhere on the internet and use that information to provide measurement services and target ads. You can opt out of the collection and use of information for ad targeting using aboutads.info/choices.

3. Use of your Personal Information

We collect and use your personal information for the following purposes:

- to operate the Website and provide our Services or information to you including to:
 - assess your application to receive our Services;
 - assist in streaming and personalising information for you;
 - enable us to process your Service requests and to provide and manage the delivery of our Services to you;
 - enable health care providers and medical practitioners to provide care to you;
 - enable us to contact your nominated contact person to provide updates on the care you receive;
 - enable us to process your personal data;
 - to manage our relationship with you, including information about similar services or terms and conditions or send you an email reminder that a task you have performed on our Website remains uncompleted;
 - enable you to communicate with us regarding your use of the Website and our Services;

- confirm your identity;
- to provide information about you to our contractors, employees, consultants, agents or other third parties for the purpose of providing the Services to you;
- communicate with you about your account (if any), or any transaction;
- to administer contracts including to negotiate, execute and or manage a contract with you;
- to be de-identified for the purposes of generating statistical data and improving the Website;
- for record keeping and administrative purposes, including accounting purposes;
- to administer, operate, protect, improve and optimise the Website and our Service offerings and customer experience;
- to comply with our legal obligations, resolve disputes or enforce our agreements with third parties;
- to enable you to take part in a competition;
- to administer and protect our Services;
- to send you marketing and promotional messages and other information that may be of interest to you and for the purpose of direct marketing (in accordance with the *Spam Act 2003* (Cth)). In this regard, we may use email, SMS, social media or mail to send you direct marketing communications. You can opt out of receiving marketing materials from us by using the opt-out facility provided (e.g. an unsubscribe link);
- for quality, training and coaching purposes;
- to send you administrative messages, reminders, technical notices, updates, security alerts, and other information about our products and Services requested by you; and
- to consider an application of employment from you.

You acknowledge and agree that we may also deal with your personal information in any other manner which is permitted by any agreement that we have in place with you, or otherwise in accordance with our other policies we have in place from time to time.

4. Disclosure of your Personal Information

We may disclose your personal information to third parties for the purposes contained in this Privacy Policy, including without limitation to:

Service Providers

We may share your personal information with service providers utilised by us in the provision of the Services to:

- develop and improve our Services;
- provide you with the Services;
- conduct quality assurance testing;
- provide support; and/or
- provide other services to us.

The service providers (and if necessary data processors) include:

- information technology service providers such as web host providers and analytical providers;
- mailing houses and such other suppliers that assist in delivering products and Services;
- organisations who carry out credit, fraud and other security checks;
- payment processors;
- hosting services;
- content delivery services;
- IT support providers;
- marketing businesses engaged by us to disseminate materials to which recipients have consented; and
- specialist consultants.

We may also disclose your personal information to health professionals who assist us in providing our Services to you, including medical practitioners and external health agencies involved in your care or treatment.

We limit the information we provide to third parties to the information they need to help us provide or facilitate the provision of our Services and associated purposes. We deal with third parties that are required to meet the privacy standards required by law in handling your personal information, and use your personal information only for the purposes that we give it to them.

Affiliates and Acquisitions

We may share some or all of your personal information with our parent company, subsidiaries, joint ventures, or other companies under a common control (**Affiliates**), in which case we will require our Affiliates to honour this Privacy Policy. In the event we are involved in a merger, acquisition or sale of assets we may disclose personal information collected by us to such entities that we propose to merge with or be acquired by, and will assume the rights and obligations regarding your personal information as described in this Privacy Policy.

Third parties with your consent and in other circumstances

We may also disclose your personal information to third parties to whom you expressly ask us to send the personal information to, or to third parties where permitted under the Privacy Act or where required in order to provide our Services to you. This also includes:

- your authorised representatives including a person who is responsible for you;
- government and regulatory authorities and other similar organisations, as required or authorised by law or as required as part of the Services; and
- such entities that we propose to merge with or be acquired by.

We may need to disclose your information to third parties outside of Australia and service providers located internationally in order to enable us to provide the Services, this includes service

providers and contractors who are located overseas (telephone answering service, data analytics, IT services) and data processing services.

Where we use a supplier outside of Australia, we will take reasonable steps in the circumstances to ensure that such overseas recipient does not breach the Australian Privacy Principles (except where such steps are not required under the Privacy Act).

We may also aggregate and/or make anonymous your personal information including sensitive information to make it available for the purposes of generating statistical data for the conducting of research and improving the Services.

Where you leave a review of our Services, or if you tag us in any of your own material (including any social media post on your personal account) you grant us a non-exclusive, royalty-free, perpetual, irrevocable and fully sub-licensable right to use, reproduce, modify, adapt, publish, translate and create derivative works from, distribute and display such content through the world in any media.

5. Consent to marketing and further solicited contact

In order to provide the Services to you, you agree to receiving emails from us for the following purposes:

- notifications about activity on the Services including general updates;
- communication from us or our representatives in connection with the Services; and
- marketing and promotional messages and other information that may be of interest to you and for the purpose of direct marketing. This includes where you have signed up to our marketing or promotional newsletters.

6. Storage & security

We use third-party cloud providers that provide hosting, data storage and other services.

We take reasonable steps to ensure your personal information is secure and protected from misuse or unauthorised access. Our information technology systems are password protected, and we use a range of administrative and technical measures to protect these systems. However, we cannot guarantee the security of your personal information.

We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

7. Links

From time to time we may include embedded content from, and links to, other websites. Those websites are not under our control. The links and embedded content are provided for your convenience only. We do not endorse, and are not responsible for the content, validity, accuracy or your use of, those websites. You should check the terms and conditions of use of those websites before you use them.

You may not create a link to the Website from another website (other than to the home page) without our prior written consent, which may be given or withheld at our sole discretion.

8. Requesting access or correcting your Personal Information

Subject to the Privacy Act, you have a right to access and correct any personal information about you that we may hold. If you wish to request access to the personal information, we hold about you, please contact us using the contact details set out below including your name and contact details. We may need to verify your identity before providing you with your personal information. In some cases, we may be unable to provide you with access to all your personal information and where this occurs, we will explain why. We will deal with all requests for access to personal information within a reasonable timeframe.

If you think that any personal information we hold about you is inaccurate, please contact us using the contact details set out below and we will take reasonable steps to ensure that it is corrected.

If we receive a request from you to access or correct personal information we will respond to you within a reasonable time after receiving your request and in the manner requested by you, if it is reasonable and practicable for us to do so. We may charge a reasonable fee for giving access to the information.

9. If we can't collect your Personal Information

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the Website or our Services to you, either to the same standard or at all;
- we may not be able to provide you with information about the Website or our Services that you may want; or
- we may be unable to tailor the content of our Website or our Services to your preferences and your experience of our Services may not be as enjoyable or useful.

10. Notifiable data breach

In the event that there is a data breach and we are required to comply with the notification of eligible data breaches provisions in Part IIIC of the Privacy Act or any other subsequent sections or legislation which supersede this Part IIIC, we will follow our relevant notifiable data breach procedures in compliance with the Privacy Act and relevant laws.

11. Updates

This Privacy Policy may be updated by us from time to time, and the updated Privacy Policy will apply from the date it is published on our Website or otherwise communicated to you. Each time you use our Website you should revisit this Privacy Policy and familiarise yourself with any changes. Continued use of our Services (including our Website) shall indicate your acceptance of any changes.

12. Enquiries, requests & complaints

Enquiries regarding this Privacy Policy or the personal information we may hold on you, should be addressed with the Privacy Officer, whose contact details are below.

Policy – Privacy

If you think your personal information, held by us, may have been compromised in any way or you have any other privacy related complaints or issues, you should also raise the matter with the Privacy Officer.

We will ensure your claims are investigated and a formal response will be provided to you, within a reasonable time, considering the circumstances of your claims. If any corrective action is determined to be required, as a result of that investigation, we will take all reasonable steps to rectify the situation and advise you of such, again within a reasonable time considering the circumstances.

If we do not resolve your enquiry, concern or complaint to your satisfaction or you require further information in relation to any privacy matters, please contact the Office of the Australian Information Commission, whose contact details are below.

Office of the Australian Information Commission

Telephone	1300 363 992
Email	enquiries@oaic.gov.au
Office Address	Level 3, 175 Pitt Street, Sydney NSW 2000
Postal Address	GPO Box 5218, Sydney NSW 2001
Website	www.oaic.gov.au

Contacting us

Entity	Harbison Memorial Retirement Village ABN 23 001 507 624
Contact	Please contact us by submitting a contact us form on the Website.