



as at May 2016

PRIVACY POLICY

General

Renaissance Retirement Living ABN 50 124 419 656 (referred to in this document as “we”, “us” or “our”) are committed to protecting the personal information we collect from you.

This policy sets out how we collect, use, disclose and manage your personal information.

We are bound by the *Privacy Act 1988 (Cth)* (“Privacy Act”) and the Australian Privacy Principles (“APPs”) set out in the Act. This policy does not apply to acts done or practices engaged in which relate directly to the employee records of our current and former employees.

Pseudonym / Anonymous

In very limited circumstances, and only where lawful and practical, it may be possible for you to use a pseudonym or remain anonymous when dealing with us. If you wish to do so you should notify us when making first enquiries. We will use our best endeavours to deal with you as requested, subject to our obligations and ability to perform the service without using your name. In most cases however, our obligations will require you to deal with us using your real name. Limited circumstances where it may be possible to use a pseudonym or remain anonymous include, when replying to surveys or in some situations when providing feedback in circumstances where your identity is not necessary to assist in resolving any issues arising from such feedback. You will be advised at the time where the option to remain anonymous or use a pseudonym is available.

What is Personal Information?

“*Personal Information*” means information or an opinion 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.

Management of Personal Information

We manage the personal information we collect by ensuring that all of our officers, employees and subcontractors are aware of and understand our obligations as well as their own obligations under the Act. We will achieve this through the provision of training and through maintaining and implementing internal policies and procedures to prevent personal information from being collected, used, disclosed, retained, accessed or disposed of improperly. We provide training to our employees about obligations, including those relating to confidentiality and privacy.

Collection of Personal Information

We may collect and hold personal information about you, that is, information that can identify you and is relevant to providing you with the services / information that you are seeking.

Kinds of Personal Information

The kinds of information we may collect and hold include: name, gender, date of birth, address, phone number, facsimile number, email address, tax file number, financial information, family circumstances, information about assets and investments, expertise and interests, driver's licence and other photographic information, Medicare card number for identity purposes, information otherwise required by law or our obligations and/or other information relevant to providing you with the services and / or information that you are, or someone else you know is, seeking.

Sensitive Personal Information

We may need to collect sensitive information about you including but not limited to information about your health, medical records, criminal record, racial or ethnic origins, political opinions and membership of political associations, religious beliefs or affiliations, philosophical beliefs, membership of associations or unions, genetic information and / or any sensitive information required to be disclosed by law and any other sensitive information required to perform the services required by you.

We will only collect sensitive information in circumstances where:

- it is reasonably necessary for one or more of the services we provide or functions we carry out; and
- you consent to the collection of the information; or
- we are required or authorised by law to collect the sensitive information.

Purpose of Collection

The personal information that we collect and hold about you depends on your interaction with us. We hold different information depending on the differing services provided to residents or, in the case of prospective residents, the information needed to assess future interactions with us.

Generally, we will collect and hold your personal information for the **purpose** of:

- providing services to you or someone else you know and receiving payment for those services.
- verifying your identity and to comply with any legal obligations.
- establishing your authority to deal with us.
- providing you with information about services that we offer that may be of interest to you.
- providing you with the opportunity to meet other residents and attend seminars and conferences.
You may opt out of receiving such information by contacting us using the details set out below. Upon receiving such a request we will remove your contact details from our distribution lists.
- facilitating our internal business operations, including the fulfilment of any legal requirements.
- analysing our services and resident needs with a view to developing new and/or improved services.
- contacting you to provide a testimonial for us.
- to respond to or provide services in relation to comments, enquiries or requests made via our website.
- complying with any legal obligations that we may have to collect and hold such information.



Method of Collection

Personal information will generally be collected by us directly from you, through the use of any of our standard forms, over the internet, via email or other written correspondence or through a telephone or general conversation with you. We may also collect personal information about you from third parties acting on your behalf (for instance, agents, brokers, financial advisors), medical practitioners, government bodies, paid search providers or financial institutions. There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these instances in advance or, where that is not possible, as soon as reasonably practicable after the information has been collected.

Internet Users

If you access our website, we may collect additional personal information about you in the form of your IP address (that is, the single numerical address for your computer on the internet which consists of four consecutive numbers ranging between 0 and 255) and/or domain name (that is, the textual address for your location on the internet which corresponds to your IP address). Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and any linked websites are not subject to our privacy policies and procedures.

Collection of Statistical Information via our website

Our internet service provider makes a record of each visit to the website. When you visit our website, the following information is logged for statistical purposes only:

- your server address;
- your top level domain name (for example .com; .gov; .au; etc)
- the date and time of your visit to the site;
- the pages you accessed and documents downloaded by you;
- the previous site visited by you;
- the type of browser used by you.

Failure to Provide Information

If the personal information you provide to us is incomplete and/or inaccurate, we may be unable to provide you, or someone else you know, with the services you, or they, are seeking.

Use and disclosure

Generally, we only use and/or disclose personal information about you for the purposes for which it was collected (as set out above) or as authorised under law. However, we may disclose personal information about you to:

- service providers, who assist us in operating our business, including IT service providers who assist in managing our servers and networks including but not limited to 'cloud'- utilising providers such as Postini, Google, Dropbox and Smart sheet etc. in order to perform one or more of our functions or activities or for the service provider to fulfil their service obligations to us. These service providers may not be required to comply with our Privacy Policy;
- a purchaser of the assets and operations of our business, providing those assets and operations are purchased as a going concern;



- any of our related entities;
- entities where we are compelled by law (eg: under the *Social Security Act* or *Financial Transactions Reports Act 1988* or *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* etc);
- Government authorities where we are of the reasonable opinion that we are legally required to do so with or without reference or notice to you.

There may be circumstances in which it is necessary for us to collect an individual's Government related identifier such as a tax file number or drivers licence etc. We will not use or disclose Government related identifiers unless we are required or authorised to do so by law or by a Court or Tribunal Order or in order to fulfil our obligations to a State or Territory authority.

Overseas Disclosure

Unless your matter or our dealings with you necessitate the disclosure of your personal information overseas and you are reasonably aware of such necessity or unless we have obtained your consent to a particular disclosure for the purposes of your matter or our dealings with you, we do not disclose personal information to overseas recipients apart from any disclosures which may occur as a result of the use by us of IT service providers who assist in managing our servers and networks and software including but not limited to "cloud"-utilising providers such as Postini, Google, Dropbox and Smart sheet etc. These providers may be based overseas or use overseas infrastructure to perform services for us, including in the USA, UK or EU.

Where the provision of this information to these providers is not considered a "disclosure", we may provide this information as part of our "use" of this information for the purposes of allowing those IT providers to assist us in operating our business and providing required services to you.

Where the provision of this information to these providers is considered a "disclosure" then where we consider in our discretion that it is practical, we will take reasonable steps to ensure that the overseas recipients of your personal information do not breach APP's in relation to that information. However, by having dealings with us, you acknowledge and consent to disclosure of your personal information to the overseas recipients described above in the circumstances described above only, and on the basis that, whilst those overseas entities may be required to comply with similar laws to the Australian Privacy Laws, we cannot confirm this requirement and you may not be able to seek redress in that overseas jurisdiction, and you will not have any redress under the Australian Privacy Laws for a breach by them. We will not be required to ensure that the overseas recipient complies with the Australian Privacy Laws or otherwise be liable or accountable for how that recipient handles your personal information and the overseas recipient may be subject to a foreign law that could compel the disclosure of your Personal Information to a third party, such as an overseas authority. If you have any objections to this please let us know.

Security

We store your personal information in different ways, including in paper and in electronic form. The security of your personal information is important to us. We take all reasonable measures to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures. We cannot guarantee that personal information cannot be accessed by an unauthorised person (eg: a hacker) or that unauthorised disclosures will not occur.



Access to and Correction of your Personal Information

You may request access to personal information we hold about you, upon making a written request. We will endeavour to acknowledge your request within 14 days of its receipt and to provide you with access to the information requested within 30 days. We may charge you a reasonable fee for processing your request (but not for making a request for access). You will need to verify your identity before access to your personal information is granted.

Once your request has been processed by us, wherever it is reasonable and practicable to do so, we will endeavour to make the information available to you in the manner requested by you.

We may decline a request for access to personal information in circumstances prescribed by the *Privacy Act*, and if we do we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint.

If, upon receiving access to your personal information, or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date. If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint. If we disagree with you about whether your personal information is inaccurate, incomplete or out of date, and you ask us to associate with your personal information a statement claiming that your personal information is inaccurate, incomplete or out of date, we will take reasonable steps to do so.

Updates

This Privacy Policy may be updated by us from time to time. We encourage you to check our website regularly for any updates to our privacy policy. This policy was last updated in May 2016. By using this website and by continuing to deal with us, you accept and agree to the collection, use and disclosure of your personal information for the purposes described in this Privacy Policy.

Feedback

If you have any queries or concerns about our Privacy Policy or the way in which we handle your personal information or wish to make a complaint about a breach of the *Privacy Act*, APP's or a privacy code that applies to us, please contact us on the contact details below. We will take reasonable steps to investigate the complaint and respond to you. If you are not happy with our response, you may complain directly to the Office of the Australian Information Commissioner.

Postal address: PO Box 143 Cleveland QLD 4163

Telephone: 07 3821 1611

Fax: 07 3821 6450

More information

For more information about privacy in general, you can visit the Office of the Australian Information Commissioner's website at www.privacy.gov.au.

