

INTRODUCTION

In the course of our business in Australia, there may be circumstances where we collect personal information. Our privacy policy has been developed to ensure that such information is handled appropriately.

We are committed to complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) in relation to all personal information we collect. This commitment is demonstrated in this policy. The Privacy Act incorporates the Australian Privacy Principles (**APPs**). The APPs set out the way in which personal information must be treated.

Who does this privacy policy apply to?

This policy applies to any person for whom we currently hold, or may in the future collect, personal information.

This policy does not apply to acts and practices which relate directly to the employee records of our current and former employees.

What information does this privacy policy apply to?

In broad terms, 'personal information' is information or opinions relating to a particular identifiable individual.

Information or opinions are not personal information where they cannot be linked to a particular individual.

2. HOW DO WE MANAGE THE PERSONAL INFORMATION WE COLLECT?

We manage the personal information we collect by:

- (a) providing staff information in their staff handbook and training on privacy issues;
- (b) providing privacy statements to all residents and/or residents representatives when dealing with their personal information;
- (c) regularly reviewing our privacy compliance, including privacy audits;

(d) implementing security measures to keep the personal information we collect safe, including using unique usernames and passwords on systems that can access personal information and security cards to access on-site information; and

(e) appointing a designated privacy officer to monitor privacy compliance and be a contact for any privacy complaints and access or correction requests.

We must comply with our professional obligations (including confidentiality obligations) in dealing with an individual's personal information at all times.

WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

. Generally, the types of information that we may collect and hold include:

(a) contact information;

(b) financial information;

(c) business circumstances;

(d) family circumstances;

(e) information about assets and investments;

(f) employment history;

(g) date and place of birth;

(h) insurance history(private health etc.

(i) banking and credit card details;

(j) expertise and interests;

(k) tax file numbers;

(l) driver's licence and other photographic information.

Where possible, we will only collect the personal information required to provide our service to the individual, or as required by our professional obligations.

WHAT SENSITIVE INFORMATION DO WE COLLECT AND HOLD?

'Sensitive information' is a subset of personal information and includes personal information that could have serious ramifications for the individual concerned if used inappropriately.

The sensitive information that we collect and hold about an individual will include any information necessary to provide legal services to the individual. This may include:

- (a) health information;
- (b) racial or ethnic origins;
- (c) religious beliefs or affiliations;
- (e) philosophical beliefs;
- (f) sexual preferences or practices;
- (g) criminal records as disclosed on National Police certificates;;

We will not collect sensitive information without the individual's consent to which the information relates unless permitted under the Privacy Act.

HOW AND WHEN DO WE COLLECT PERSONAL INFORMATION?

Where reasonable and practicable, we will collect personal information directly from the individual to whom the personal information relates.

However, we have a large referral network and also collect personal information from numerous other sources. It is not possible to provide an exhaustive list of these sources.

HOW DO WE HOLD PERSONAL INFORMATION?

We hold personal information:

- (a) physically,
 - (i) on our premises; and
 - (ii) by third party data storage providers in MAckay.
- (b) electronically,
 - (i) through internal servers and websites and a private cloud;
 - (ii) on electronic storage devices, including DVD and USB;
 - (iii) by a third party data storage provider in Australia;
 - (iv) by an off-side data replication provider in Australia; and
 - (v) by an email filtering hosted by ourself.

We will take all reasonable steps to ensure that all personal information we hold is secure from any unauthorised access, misuse or disclosure. However, we do not guarantee that personal information cannot be accessed by an unauthorised person (e.g. a hacker) or that unauthorised disclosures will not occur.

6.3 Some of the methods we use to store and secure information include:

- (a) using security cards to access areas that contain personal information;
- (b) using unique usernames, passwords and other protections on systems that can access personal information;
- (c) using our document retention system (locked storage area with only authorised access) for original documents; and
- (f) using lockable filing cabinets for storing more sensitive information, other important documents or financial records.

FOR WHAT PURPOSES DO WE COLLECT, HOLD, USE OR DISCLOSE PERSONAL INFORMATION?

We take reasonable steps to use and disclose personal information for the primary purpose for which it is collected. The primary purpose for which information is collected varies, depending on the particular service being provided, but is generally to provide care and services to an individual ..

In the case of potential employees, the primary purpose the information is collected is to assess the individual's suitability for a position with us.

Personal information may also be used or disclosed by us for secondary purposes which are within the individual's reasonable expectations and related to the primary purpose of collection.

7.4 For example, we may use personal information for the following secondary purposes:

- (a) , to inform the individual of updates and changes to the act and/or legislation that may affect them and to invite them to events relevant to their industry (which can be unsubscribed from at any time); or
- (b) to provide a referral.
- (c) with the consent of the individual to whom the information relates;

Otherwise, we will only disclose personal information to third parties with the relevant individual's consent or if the disclosure is permitted by the Privacy Act.

DO WE DISCLOSE INFORMATION OVERSEAS?

We do not disclose personal information to overseas recipients..

What kinds of credit information may we collect?

The main kind of credit information we collect is an individual's identification information.

- (a) information about any credit that has been provided to you;
- (b) your repayment history;

(c) information about your overdue payments;

(d) if terms and conditions of your credit arrangements are varied;

(e) if any court proceedings are initiated against you in relation to your credit activities;

We do not collect your credit information from credit reporting bodies, banks or other credit providers.

How and when do we collect credit information?

In most cases, we will only collect credit information about you if you disclose it to us and it is relevant in providing you with the our service.

How do we store and hold the credit information?

We store and hold credit information in the same manner as outlined in this policy.

Why do we collect the credit information?

We may also collect credit information to process payments.

Overseas disclosure of the credit information

We will not disclose your credit information to overseas entities unless you expressly advise us to, apart from the following circumstances:

(a) to the extent that it is necessary or desirable to make such a disclosure to obtain payment of money owed to us.

How can I access my credit information, correct errors or make a complaint?

You can access and correct your credit information, or complain about a breach of your privacy in the same manner as set out in this policy.

HOW YOU CAN ACCESS AND CORRECT YOUR PERSONAL INFORMATION?

It is important the information we hold about individuals is up-to-date. Individuals should contact us if their personal information changes.

Individuals may request access to the personal information we hold or ask for their personal information to be corrected.

A request by an individual to access or correct personal information about the individual must be made to the following contact officer:

Contact person: Privacy Officer (Director of Nursing)

Telephone number: 0749680800

Email address: nacc@glenellacare.com.au

Postal address: 35 Davey Street, Mackay Q'ld

We will grant an individual access to their personal information as soon as possible, subject to the request circumstances.

In keeping with our commitment to protect the privacy of personal information, we will not disclose personal information to an individual without proof of identity.

We may deny access to personal information if:

- (a) the request is impractical or unreasonable;
- (b) providing access would have an unreasonable impact on the privacy of another person;
- (c) providing access would pose a serious and imminent threat to the life or health of any person;
- (d) providing access would compromise our professional obligations; or
- (e) there are other legal grounds to deny the request.

We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed prior to it being levied.

If an individual is able to establish that personal information we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

HOW CAN A PERSON COMPLAIN ABOUT A BREACH OF PRIVACY?

If a person wishes to complain about an alleged privacy breach, they must follow the following process:

- (a) The complaint must be firstly made to us in writing. We will have a reasonable time to respond to the complaint.

- (b) In the unlikely event the privacy issue cannot be resolved between us and the individual, the individual may take their complaint to the Office of the Australian Information Commissioner.

A person can complain about a breach of privacy by contacting us using the contact details below:

Contact person: Privacy Officer (Director of Nursing)

Telephone number: 0749680800

Email address: nacc@northviewagedcare.com.au

Postal address: 35 Davey Street, Mackay Q'ld

CHANGES TO THE POLICY

We may update, modify or remove this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.

This policy was last updated in March 2014. If you have any comments on the policy, please contact our privacy officer on the contact details in this policy.