





### 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 manage and protect your personal information. A number of our subsidiaries engage in activities under other brands.

You can contact the Aveo Group Privacy Officer or your village/facility manager to obtain details of our subsidiaries that this policy also applies to. You can obtain a copy of the most current version 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* (**Privacy Act**) and other relevant State laws that govern health information.

### 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 who is identified or who is reasonably identifiable.

### What personal information do we collect and hold?

We collect personal information that is reasonably necessary for our functions or activities. If the personal information is sensitive information (described below), a collection will only occur if you consent to the collection, or we are permitted by law to collect the sensitive information.

The personal information we collect and hold depends upon the nature of our dealings with you.

In general, the personal information we may collect and hold includes:

- your personal details (eg. name, gender, date of birth, contact details etc.);
- information to assist in conducting our business and resolving complaints;
- information about payment for services (including banking details);
- employment history and educational qualifications (eg. for prospective employees);
- medicare, pension or other concession details, private health fund details; and
- sensitive information such as:
  - health information (eg. medical history, test results, advance care wishes and health assessments);
  - information about your religion, ethnicity, sexual preferences or political opinions; and
  - criminal records (eg. for prospective employees).

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. This information may include health information and we ask for your consent to collect this sensitive information. In most cases the information is collected in a written application form that we will ask you to complete. Initially we use certain personal 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.

### COVID-19

As a direct consequence of the current COVID-19 pandemic, Aveo may need to collect personal information from various persons (including



residents, employees, contractors and visitors) in order to prevent or manage COVID-19 at its retirement villages, aged care facilities and its other workplaces.

In line with recommended practices by the Australian Government Department of Health, this may include information needed to identify risk and implement appropriate controls to prevent or manage COVID-19, such as:

- whether the individual or a close contact of the individual has been exposed to a known case of COVID-19; and
- whether the individual has recently travelled overseas and to which countries.

Information gathered about an individual that relates to infection and risk of exposure with COVID-19 will be sensitive information under the Privacy Act. Related information about the individual's symptoms, treatment and general health information will also be sensitive information.

Aveo can collect health information about individuals if the individual gives consent (express or implied) to its collection; and the information is reasonably necessary, or directly related to one or more of its functions or activities, such as to prevent or manage COVID-19 at its retirement villages, aged care facilities and its other workplaces. In these circumstances, consent

will not be necessary if the collection is required or authorised by or under an Australian law or a "permitted general situation" exists under APP 3.4(b). This includes where the collection is undertaken to lessen or prevent a serious threat to the life, health or safety of any individual, or to the public health or safety and it is unreasonable or impracticable to obtain the individual's consent.

Only the minimum amount of personal information reasonably necessary to prevent or manage COVID-19 will be collected, used or disclosed.

## How do we collect personal information?

Whenever it is reasonable and practicable to do so, we collect personal information about you directly from you (eg. in person, over the telephone, by you completing forms). From time to time we may also collect information about you from 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.

We also generally collect personal information from other third parties such as a report provided by a medical professional or an employment reference in respect of prospective employees. We may also collect personal information from publicly available sources.

Occasionally, we may receive information about you from third parties. We will take reasonable steps to inform you of who we are, the reason why we are collecting your personal information, the consequences if we do not receive that personal information and any other matters required by law.

### **Cookies**

A cookie is a small data file that may be stored on the computer of a web user (usually in the browser software folder) the first time the user accesses a web site operating cookies. Cookies are necessary to facilitate online 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).

### **Camera surveillance**

We may consider it necessary to carry out camera surveillance in our aged care or retirement facilities to enhance safety, particularly the safety of residents and workers. Camera surveillance will be clearly signed where it is carried out and residents, their representatives and Aveo workers will be notified of the installation of surveillance cameras prior to their installation. These surveillance systems may collect personal information.

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

We will hold your personal information by way of a combination of physical records and electronic storage (eg. databases), which may be through third party service providers. Images recorded by camera surveillance are stored as digital files within the camera surveillance software for a limited period of time (generally, 30 days) after which they usually will be deleted unless required in certain circumstances (eg. in respect of an investigation).

We will take reasonable steps to protect the information from misuse, interference, loss and from 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. We will take reasonable steps to destroy or permanently de-identify the information if it is no longer needed for any purpose and we are not required by law to retain the information.

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

We may collect, hold, use and disclose your personal information for the primary purposes for which it was collected. The purposes and the parties to whom we might disclose it will be reasonably apparent to you when we collect your information.

Generally, primary purposes include:

- conducting our business;
- providing our services;
- assessing applications for our services;
- purchasing goods and services;
- assessing, managing and enhancing our services;
- assessing or investigating complaints, incidents or suspicion of misconduct;
- responding to inquiries and complaints;
- complying with obligations to, and co-operating with, government authorities;
- providing company information and updates;
- assessing applications by prospective employees; and
- complying with our legal obligations.

In relation to COVID-19, a primary purpose of collecting personal information is to prevent or manage the risk and/or reality of COVID-19 to ensure that necessary precautions can be taken in relation to that individual and any other individuals that may be at risk.

We may also use and disclose your personal information for other purposes which you consent to or which are required, permitted or authorised by or under law (for example, if a "permitted general situation" exists (refer to above)).

# Privacy Policy

We may disclose personal information (including, in certain circumstances, sensitive information) to:

- those involved in providing, managing or administering our services (including, for example, our representatives, third party suppliers and printers);
- contractors and those providing services to us;
- referees and health referral organisations;
- medical and health professionals, hospitals and other aged care providers;
- our professional advisers;
- insurers;
- auditors;
- government bodies, regulators, coroners and undertakers;
- your family members and representatives; and
- any person or organisation to which you have consented or we are required, permitted or authorised by or under law to disclose.

On 29 November 2019, Aveo was acquired by entities controlled by Brookfield Asset Management Inc. We may also disclose personal information (other than sensitive information) to our related bodies corporate in accordance with the Privacy Act.

Personal information disclosed by Aveo to its related bodies corporate will be subject to the principles contained in this policy and de-identified as necessary depending on the nature of the information and the circumstances in which the information is disclosed.

A number of our related bodies corporate (including Brookfield Asset Management Inc)

are located overseas. We are likely to disclose personal information to our related bodies corporate located in Canada, the United States of America and Bermuda. We are not likely to disclose your personal information to any other overseas recipient unless required by law.

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.

## Marketing

We may use or disclose your personal information to send you information about other Aveo Group products and services which may be of interest to you (except if sensitive information, we will only do so with your consent), 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 (contact details are below) 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*.

We will not sell your personal information to other organisations.

## How can you access and correct your personal information?

We will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete, up to date and relevant.

Under the Privacy Act, you may seek access to or correction of the personal information that



we hold about you. These rights are subject to certain exemptions. You can ask for access or correction by contacting our Privacy Officer on the details contained in this policy or, if you are a resident of any of our retirement villages or aged care facilities, you can contact the manager of your village or facility. You may be asked to submit your request in writing. We must give you access to, and take reasonable steps to correct, your personal information if it is incorrect, unless an exception in the Privacy Act (including the APPs) or other applicable law applies.

We will require you to verify your identity (and provide us with evidence of your authority, if applicable) before we provide access or correct your personal information. We may charge a reasonable fee for providing access.

We will advise you in writing if a correction request is refused and will include in this advice the information required by the APPs or any other applicable law.

### How can you make a complaint?

If you have a complaint about a suspected breach of the APPs or other privacy complaint 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 Office of the Australian Information Commissioner:

Post: GPO Box 5218  
Sydney NSW 2001

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Telephone: 1300 363 992

### Mandatory Breach Reporting

We aim to ensure that your personal information is handled in strict compliance with the APPs under the Privacy Act and we will take all reasonable steps to mitigate the risk that a breach of privacy will become an eligible data breach.

Where we believe that a breach of privacy may have occurred, we will take reasonable steps to manage the situation. We will comply with any applicable breach notification requirements of the Privacy Act, including requirements to notify you and the Office of the Australian Information Commissioner.

### Privacy Officer Details

You can contact the Aveo Group Privacy Officer as follows:

Telephone: (02) 9270 6146

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

Email: [privacyofficer@aveo.com.au](mailto:privacyofficer@aveo.com.au)

### 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 and update this policy on a periodic basis to reflect our current practices and obligations, 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 20 April 2020***

