

APPLIED AGED CARE SOLUTIONS PTY LTD PRIVACY POLICY

(Collecting Personal Information)

Applied Aged Care Solutions Pty Ltd ABN 46 083 264 359 (**AACS, we, us, our**) understands that you value your privacy and wish to have your personal (including health) information kept secure. For these reasons, we place a high priority on the security of the personal information we hold. We have developed this policy to inform you of how we manage your personal information and maintain its integrity and security.

The Privacy Act 1988 (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) set the standard for how we deal with your personal information. You can find more information about the Privacy Act and the Australian Privacy Principles at the Office of the Australian Information Commissioner's website at: www.oaic.gov.au.

This Privacy Policy sets out the manner in which we collect, use, disclose and manage personal your information. By:

- visiting our website;
- making an enquiry about our products and/or services;
- acquiring goods through our website or otherwise;
- supplying goods or services to us; or
- entering into an agreement with us,

you have taken to have read, and agree to the collection, use disclosure and handling of your personal information in accordance with this Privacy Policy.

While we believe in keeping your personal information highly secure, we also believe that you have the right to be informed about how we deal with that information so if, on reading this policy, you are unclear on any of the matters or simply want more information, please contact us by using the contact details provided below.

1 Collecting Personal Information

We aim to collect personal information only if it is reasonably necessary to provide the service, product or information you, or a third party such as the residential aged care facility within which you live (**Aged Care Facility**), has requested from us.

Personal information has the meaning given to that term in the Privacy Act and includes information or an opinion (whether true or not) about an identified individual, or an individual who is reasonably identifiable. In this Privacy Policy, 'personal information' also includes **sensitive information**, which is defined in the Privacy Act to include information or an opinion about an individual's racial or ethnic origin, religious beliefs or affiliations, sexual orientation or practices, health information, or genetic information that is not otherwise health information.

In this Privacy Policy, **health information** has the meaning given to that term in the Privacy Act, and includes information or an opinion about the health or disability of an individual, health services provided (or to be provided) to an individual, and other personal information that is collected to provide (or in providing) a health service.

If you are a resident of an Aged Care Facility to whom we provided Aged Care Funding Instrument (**ACFI**) audit/review services we may collect and hold the following personal information about you:

- your name;
- age and date of birth;
- gender;
- address;
- information about your treating doctors or healthcare professionals,

- your electronic and/or hard copy medical and assessment records which are maintained by your Aged Care Facility, including specific details about your medical history, medications, illnesses, disabilities, referrals, immunisations, allergies and adverse reactions, general health and third party documents such as medical practitioner notes and directives, comprehensive medical assessments; and
- your Medicare card number, Department of Veteran Affairs (DVA) file number or your Individual Healthcare Identified (IHI).

If you purchase products from our retail website, we may collect and hold the following information:

- name;
- address; and
- email
- phone numbers

2 How we collect Personal Information

Unless it is unreasonable or impracticable to do so, we collect your personal information from you directly, including by using cookies on our website

In most cases however we will collect information about you from a third party such as the Aged Care Facility who is managing your care. At the time of collection, or as soon as practicable after we have collected it, we will take such steps (if any) as are reasonable in the circumstances to notify you or otherwise ensure that you are aware of the collection and of certain matters relevant to the collection.

Naturally we collect and hold a broad range of personal information gathered during the course of providing our products or services. However as stated above, we strive to ensure that we collect and hold only that personal information which is relevant and necessary to the product or service which we are providing to you or to your Aged Care Facility.

2.1 How We Use Cookies

We may use cookies on some areas of our website. A cookie is a small file saved on your computer's hard drive. When you return to our website, the data saved in the cookie is sent back to the website. We use cookies to manage your session if you are logged into our website/s. The cookies we use in no way give us access to your computer or any information about you, other than the information you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

3 Purposes of Collection

As applicable, we collect and hold your personal information for the primary purpose of either:

- assisting your Aged Care Facility with the product or service requested from us, including:
 - performing ACFI reviews of the Aged Care Facility; or
 - providing and maintaining a software product that an aged care or health care service provider uses;
- providing you with goods and/or services that you have requested from us.

The applicable primary purpose should be clear to you. If it is reasonable to expect that we would use or disclose your personal information for purposes which are directly related to that primary purpose, we may also use your personal information to:

- verify your identity and to link the correct individual to the correct healthcare information stored by your Aged Care Facility;
- develop and improve our customer service by means of research, marketing, service or product development or planning;
- inform you of products that can be purchased from us;
- inform you of developments at AACCS and other services that we can provide;

- assist you with enquires or complaints; and
- to comply with any law, and compliance with any lawful request of a law enforcement agency or government authority.

4 Disclosure of personal information

We may disclose your personal information to the following external providers of services that we may use to operate our business and manage our business systems, for example:

- IT technicians who may need access when providing on-site support (although it is our practice for them to work under the supervision of one of our own IT technicians);
- file storage service providers;
- database service providers; and;

providers of payment processing and identification verification services.

Those companies will be permitted to access only the personal information they need to deliver the service to you, or to your Aged Care Facility. AACCS takes reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

We are not likely to disclose personal information to overseas recipients and would only do so if we reasonably believe that the recipient is subject to a law or scheme that will protect your personal information in a way that is substantially similar to the way the APPs protect your personal information. If this is not the case, we will take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach to the APPs in relation to your personal information. We will otherwise obtain your consent to the disclosure.

The privacy and collection practices of entities to whom we disclose personal information are governed by their own privacy policies and collection notices.

We will not otherwise disclose information about you (either within Australia or overseas) unless the disclosure:

- is required by law;
- is authorised by law; or
- you have consented to our disclosing the information about you.

5 Personal Information Quality

We aim to ensure that your personal information is accurate, complete and up to date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested and properly update the information to us to keep it true, accurate, current and complete.

If you believe that the information is inaccurate or incomplete, please contact us and we will use all reasonable efforts to correct the information.

In the event that we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the information claiming that you believe the information is inaccurate, incomplete, out of date, misleading or irrelevant.

6 Securing Your Personal Information

We are committed to maintaining the security and confidentiality of your personal information and we take reasonable steps to protect it from misuse, loss and unauthorised access, modification or disclosure. We will also take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed.

When we collect your personal information in the form of a hard-copy file from your Aged Care Facility, the facility will send your file to us by door to door courier. In the event that a courier is not available, it will be sent by Australia Post Platinum Post, which must be signed for on delivery. We will return your hard-copy file to the facility in the same way when it is no longer needed by us. We will

store the clinical information obtained from your file in our IT systems (which are protected by a local office and data centre based server) until it is no longer required in the event of a Commonwealth audit of your aged care facility.

We have the following security measures in place to protect your personal information:

- all computers are password protected and virus protected;
- our offices are monitored by a back to base alarm service that is monitored 24 hours by a security service;
- our offices are securely locked after hours; and
- we have installed a commercial grade four locking point metal security door and frame on the main entrance with security key.

7 Accessing and Correcting Your Personal Information

You may request access to, or correction of, personal information that we hold about you. We will give you access to, or correct, your personal information unless there is a lawful reason for refusing your request for access or correction. If we refuse your request we will give you a written notice explaining our reasons for that refusal and how you may complain about that refusal.

8 Changes to this Statement

This Privacy Policy is not a static document, and we may make changes to this Privacy Policy from time to time for any reason. We will publish any updated Privacy Policy incorporating those changes on our website.

9 Change in control of AACS

If we sell or otherwise transfer part or the whole of AACS or our assets to another organisation (including in the course of a transaction like a sale, merger or acquisition or as part of a dissolution, liquidation, administration, receivership or other form of insolvency), you agree that your personal information that is collected by AACS may be disclosed to a third party, prospective buyer, transferee or insolvency practitioner and that this is reasonable to enable that party to continue or manage the business.

10 Complaints

If you have a complaint about our collection, use or disclosure of your personal information, or you wish to make a complaint about a breach of the Australian Privacy Principles, please contact our Privacy Officer at the details set out below. Please set out details of your complaint and your contact details. Our Privacy Officer will contact you to acknowledge your request and ask for any other applicable information. Our Privacy Officer will then investigate the issue and advise you in writing of the outcome.

You can also make a complaint to the Office of the Australian Information Commissioner. Further information is available at www.oaic.gov.au.

11 Contacting Us

If you would like further information regarding this Privacy Policy, if you have concerns about the information that we currently hold about you, including how we use or disclose that information, or any other aspect of this Privacy Policy, please contact the Privacy Officer at:

Telephone + 61 3 9836 8852
Email info@aacs.com.au
Post Applied Aged Care Solutions Pty Ltd
PO Box 4088, Balwyn East VIC 3103