Privacy Policy

1. Privacy Policy

Your privacy is important to us and we are committed to securing the privacy and confidentiality of your personal information. This Privacy Policy provides information about how we manage the personal information we collect, hold, use and disclose and outlines:

- the types of personal information we collect, use, store and disclose;
- how, why and when we collect, store, use and disclose personal information;
- the steps we take to keep personal information we collect secure and the steps we take to destroy or to de-identify personal information, when required;
- the steps we take to maintain the integrity, quality and accuracy of the information we collect;
- how you can request access to and/or correction of the personal information we hold about you; and
- how you can complain to us about how we have handled your personal information.

This statement sets out the Privacy Policy of Centennial Living Management (Centennial Living /we/us/our) and related entities in accordance within the Privacy Act 1988 and the privacy provisions of other applicable Australian legislation. You can obtain a copy of this policy from our website at www.centennialliving.com.au or by contacting our office on the contact details at the end of this statement.

General information about privacy and the operation of the Privacy Act 1988 can be found at the Office of the Australian Information Commissioner; www.oaic.gov.au.

2. Compliance with the Privacy Act

Centennial Living is committed to complying with the Privacy Act 1988 and the Australian Privacy Principles. This policy applies to personal information we collect from external stakeholders. We require our employees to comply with this policy in relation to any personal information they handle. We also use our best endeavours to ensure that contractors, suppliers and service providers we engage from time to time comply with similar obligations with respect to any personal information they obtain from us or to which they may have access during the course of providing goods and/or services to us.

3. Collection of Personal Information

This policy deals with the collection, use and disclosure of, and your access to, information we may have about you. The type of personal information that is collected will be determined by nature of the relationship Centennial Living has with you.

"Personal information" refers to information or opinion in any form through which an individual can reasonably be identified, regardless of whether the information is true or not.

The type of personal information collected by us may include, but is not limited to:

- Your name, date of birth, address, telephone number(s), email address;
- Contact and identification details of family members or any third party that you have authorised to provide your personal information on your behalf, including solicitors appointed by you under a power of attorney);
- Correspondence between you and us;
- Personal information provided to us when you make an inquiry, request information, respond to marketing or lodge a complaint;
- Banking or payment details, including credit card and/or bank account details.

If you are job applicant, business partner or third-party service provider we may also collect:

- Personal information provided when you commence a business relationship with us;
- Personal information provided when you apply for employment with us; such as banking, tax and superannuation funds details.

If you are a retirement village resident, we may from time to time collect sensitive personal information. This may be health information such as:

- Your medical history and whether you have any illness, disability or injury, or are receiving treatment or any medication that you have been prescribed;
- Your requests regarding the provision of health services to you;
- Any health services or support to be provided to you.

We are particularly careful handling sensitive information and we will only collect your sensitive information if:

- You have consented for us to do so and the information is reasonably necessary for one or more of our functions or activities;

- We are permitted to do by the Australian Privacy Principles. This may be for example, where the collection is necessary to lessen or prevent a serious threat to life, health or safety and it is unreasonable or impracticable to obtain your consent to the collection;
- We are mandated or authorised to do so by law.

4. Anonymity and Pseudonymity

You have the option of not identifying yourself, or using a pseudonym, when dealing with us. However, this does not apply where we are required or authorised by or under Australian law, or a court or tribunal order, to deal with individuals who have identified themselves, or where it is impracticable for us to deal with you on an anonymous or pseudonymous basis.

For example, where you request access to and/or correction of any personal information we hold about you, or you wish to make a complaint about our handling of personal information, we reserve the right to verify your identity before processing your request or dealing with your complaint, in order to protect the privacy of personal information collected from unrelated individuals. If we are unable to verify your identity, then we may be unable to satisfy the request or to complete the complaints-handling process.

5. How We Collect Personal Information

By way of telephone or via internet enquiry, online tracking or cookies or from completed forms, meetings, interviews, telephone conversations or from a third party, for example, a reference. We may also collect and receive personal information from third parties to whom an individual has given permission to share the information with us. Additionally, we may collect the information from individuals when we are authorised or required by law to collect such information.

At the time personal information is collected, Centennial Living will take reasonable steps to inform you about the purpose for which the information is collected and your rights to access the information.

Generally, we only collect personal information when we specifically request that information, except in circumstances where the information is voluntarily disclosed to us without us asking for such information or otherwise without us taking active steps to collect the information.

Where we collect unsolicited personal information, we will comply with our statutory obligations to determine whether the information could lawfully have been collected. If we determine that we could not have lawfully collected the information, we will take reasonable steps to destroy or to de-identify the information as soon as reasonably practicable.

6. How We Hold Personal Information

Personal information is held in written records and in electronic storage on databases. We take reasonable steps to protect the information from unauthorised access, loss, misuse or modification. Centennial Living

will not store your personal information any longer than necessary. Once personal information is no longer required, we will take reasonable steps to destroy or to de-identify that information.

7. Security of Personal Information

Centennial Living will take reasonable steps to secure the personal information that it collects and to ensure that the information is accurate. Secure information technology platforms are used for information storage and employees are required to maintain the confidentiality of all personal information.

Centennial Living also complies with the Notifiable Data Breach Scheme. Our obligation under the scheme is to mandatorily report eligible data breaches to the Australian Information Commissioner. In the event of an eligible data breach, Centennial Living is committed to complying with any directions handed down from the Commissioner.

8. Use and Disclosure of Personal Information

Centennial Living's policy is not to use or disclose personal information that it has collected, other than in accordance with the Australian Privacy Principles. This means Centennial Living will not to use or disclose personal information other than for the purpose for which it was collected or any reasonable secondary purpose, unless we are required or authorised by law to disclose such information. It is Centennial Living's policy to obtain your consent before it uses information for a purpose or in a manner different to the purpose or manner that was disclosed to you, unless a statutory exception applies (such as it is impracticable to obtain your consent and we believe the use or disclosure of the information is necessary to lessen a serious threat to the life, health or safety of any individual).

Generally, we use personal information for the primary purpose of providing services to our clients and residents and to operate our business and facilities.

Accordingly, we may use personal information we collect for the following purposes:

1. to assess an application for residency;
2. to manage the provision of goods and services to residents of our retirement villages;
3. to operate and to manage our retirement villages;
4. to facilitate the use of software tools and programs to enable us to improve the quality of the goods and services we supply;
5. to facilitate the provision of healthcare services, first aid and/or medical treatment, as and when required;
6. to respond to queries and to complaints;
7. to process transactions and to administer accounts;
8. to process payments, including via credit card and direct debit arrangements;
9. to inform you regarding events and activities being organised by us occurring at one of our retirement villages which we consider to be of interest to you;

10. to comply with any obligations under any law or statute that binds us;
11. to comply with obligations or to enforce rights under a contract into which we have entered;
12. to assess and to manage the supply of goods and/or services to us by a contractor or a service provider;
13. to assess an application for employment with us;
14. to provide security, including through the use of closed-circuit television cameras and other security products and measures;
15. marketing activities

From time to time, we engage contractors and subcontractors in the course of conducting our business activities. It is sometimes necessary for us to give our contractors and subcontractors access to personal information held about individuals, including residents and customers. In these circumstances, it is our policy to require the contractors or subcontractors who receive personal information to comply with statutory obligations regarding the privacy of personal information, including compliance with the Australian Privacy Principles.

Parties to whom Centennial Living may disclose relevant personal information are:

1. Related parties and entities of Centennial Living Management, including the operators of retirement villages;
2. Service providers, employees, consultants, professional advisors, agents and contractors that we engage in the course providing, managing or administering our services. For example, our representatives, third party suppliers and printers, insurers medical and health professionals, hospitals and aged care providers;
3. Regulatory authorities where required by law;
4. Health care professionals or other individuals such as family members or carers, with your consent or where required or authorised by law;
5. Your representative, such as your power of attorney or a solicitor as agreed by you;
6. Social media sites and organisations and other virtual communities and networks where people create, share or exchange information;
7. Other entities, with your consent (either express or implied);
8. Government and regulatory authorities, including external dispute resolution bodies, taxation authorities, or where we are required by law to disclose your personal information.

We may disclose personal information to third parties in the following circumstances:

1. Where we are required or authorised to do so by law or court or tribunal order, including in order to comply with any mandatory reporting requirements imposed on us;
2. to contractors, agents and third-party service providers that provide administration or other services in connection with the operation of our business and activities;

3. to health providers and to other contractors in order for them to provide services to our residents and customers;
4. to our professional advisers, to facilitate their provision of advice and other professional services to us;
5. to our auditors and insurers;
6. to marketing providers, to facilitate the provision of marketing us, our services and our retirement villages;
7. to Government departments and agencies, including for the purpose of us complying with our statutory obligations;
8. to Government departments and agencies, including for the purpose of facilitating the use by those departments and agencies of information for research and other purposes; and
9. to third parties where we consider it reasonably necessary to do so in order to identify, contact and/or bring legal action against an individual or an entity whom we suspect or is aware is causing harm to, or interference with us, our stakeholders or our property.

We may disclose credit card information and/or bank account details to third party payment processors and to financial institutions for the purpose of processing payments and transactions related to the goods and services we supply.

9. Centennial Living's Marketing Activities

It is important for us to be in contact with our clients and potential customers. For this purpose, we may directly send marketing material or messages through the post or by email or online promotion to existing and potential customers. In these circumstances, it is Centennial Living's policy to comply with the stated purpose for which the personal information is collected. There will always be the opportunity to opt out of receiving further marketing material. Upon receipt of such a request Centennial Living will update its records within a reasonable timeframe.

It is Centennial Living's policy not to sell personal information about existing or potential customers to other organisations.

In undertaking any direct marketing activities, we will comply with other laws relevant to marketing, including the *Spam Act 2003* (Cth), the *Do Not Call Register Act 2006* (Cth) and the *Competition and Consumer Act 2010* (Cth) (incorporating the Australian Consumer Law).

10. Website and Privacy

When you visit the Centennial Living websites we may electronically collect particular information about the visit. This can include but is not limited to, the time and date, your IP address, cookies and the referring website address. Cookies allow our website to interact more efficiently with your computer or device. We use cookies to collect data for a range of purposes, such as enhancing the operation of our websites; tracking user preferences and to improve advertising or marketing. Our website contains links to other

websites which are outside our control and are not covered by this privacy policy. If you access other websites using the links provided, the owners of these websites may collect information from you which will be managed within the bounds of their privacy policy.

11. Adoption, Use or Disclosure of Government-related Identifiers

We will not adopt, use or disclose as our own, identifiers that have been assigned by a Commonwealth or a State or Territory agency (including Medicare number, Department of Veteran Affairs number or Tax File Numbers).

12. Maintaining the Integrity and Currency of Personal Information

We are subject to a statutory obligation to take reasonable steps to maintain the integrity and currency of personal information we hold.

We rely on accurate and reliable information in order to deliver necessary and effective services.

If we are satisfied that any of the information we hold about an individual is inaccurate, out-of-date, irrelevant, incomplete or misleading, or a request is made to us to correct such information, then we will take reasonable steps to ensure that the information we hold is accurate, up-to-date, complete, relevant and not misleading.

If we disclose personal information about an individual to a third party and the information is later corrected or updated, we will take reasonable steps (or the individual may request that we take reasonable steps to) notify the recipient of the incorrect information about the correction.

13. Security of Personal Information

In accordance with our statutory obligations, we take reasonable steps to protect the personal information we collect and hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. The steps we take depend on a number of factors, including in particular the sensitivity of the information. We regularly review the steps we take to secure personal information we collect and hold.

We use a range of physical and electronic security measures to protect the personal information we collect and hold, including the use of secure databases. We also ensure that only authorised, properly trained staff have access to personal information. Where a third party is granted access to personal information we collect and hold, we use our best endeavours to ensure that the third party is granted access to only the personal information it requires to complete its obligations owed to us, and can only use the personal information to complete those obligations.

14. Access To and Changing Personal Information

You have a right to access, update and correct personal information that we hold about you.

Subject to our statutory obligations, we will if requested, give existing and potential customers access to their personal information in accordance with the Australian Privacy Principles. Before such information is released, Centennial Living will require proof of identity from the enquiring person.

There is no fee associated with a request to access personal information. However, we reserve the right to charge a reasonable administration fee for the provision of access to and/or copies of personal information. We will endeavour to provide you with information about this administration fee before giving access to and/or copies of the information.

We will respond to a request for access within a reasonable time after we receive the request and we will endeavour to provide access to the information in the manner requested, unless it is impracticable for us to do so.

We may refuse access to personal information we hold about an individual in circumstances permitted by the Australian Privacy Principles, including if we reasonably believe that:

- providing access would pose a serious threat to the life, health or safety of any person, or to public health or public safety;
- giving access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious; and
- providing access would be unlawful, or denying access is required or authorised by or under Australian law or court order.

If any existing or potential customer wishes to update or correct personal information held by about them, we will do so on receipt of a written request addressed to our Privacy Officer who can be contacted at the address listed below

15. Cross-border Transfer or Disclosure of Personal Information

We do not disclose or transfer personal information of any individual to a third party situated outside Australia except in situations related.

In the event we engage in cross-border transfer or disclosure of information (including storing information on cloud services located outside Australia), we will take reasonable steps to ensure that adequate security mechanisms are in place to protect your privacy.

16. Amendments to Centennial Living's Privacy Policy

This policy may be updated and amended from time to time, at our discretion. The current version of Centennial Living's Privacy Policy will be accessible at its web site, which can be found at https://www.centennialliving.com.au

17. Queries or Complaints

If you have any questions regarding our Privacy Policy or if there are any concerns or complaints regarding our treatment of your personal information, then please contact the Privacy Officer at Centennial Living by post, telephone or email.

Privacy Officer

Centennial Living Management
Level 4, 616 St Kilda Road, Melbourne Vic 3004
1300 098 000
info@centennialliving.com.au

We aim to resolve any complaint quickly and to your satisfaction. If you are not satisfied with our response to your complaint, you can refer your concerns to the Office of the Privacy Commissioner for further deliberation.

Office of the Privacy Commissioner

https://www.oaic.gov.au/contact-us
Phone: 1300 363 992

18. Terms of Use

This site is made available by Centennial Living Management Pty Ltd and is provided for personal use only. When you access the Centennial Living website(s), you are agreeing to our terms and conditions.

Centennial Living Management has endeavoured to ensure all information on this site is correct at the time it is included. However, the accuracy of the material on this site cannot be guaranteed and use of this information is at the user's risk.

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19. Terms of Use

Centennial Living Management (we, us, our) collects, holds and uses personal information subject to the Privacy Act and the Australian Privacy Principles (APPs). Our privacy policy reflects how we comply with the APPs. We generally collect information by lawful and fair means and where it is reasonably necessary for one or more of our functions or activities.

Our policy lists the purposes for which we use and/or disclose the information we collect. They include (but are not limited to) providing goods and/or services, fulfilling our contractual obligations, investigating complaints made in relation to our information-handling processes, verifying your identity in relation to an access request, addressing queries and directly marketing our services to you.

We may disclose information to third parties from time to time. Among other reasons (as listed in our privacy policy), we disclose information in order for the third party to fulfil their obligations owed to us, including for the provision of goods and/or services to us. We may also disclose information where we believe (in good faith) we are compelled to disclose such information by law or court or governmental order.

We may use personal information we collect from you for the purpose of directly marketing our goods and/or services to you, unless you opt out of receiving such communications.

Personal information may be stored, processed and/or backed up on servers (including servers provided by third parties) that are located in Australia but which may be owned and operated by entities that are based outside Australia.

Where it is reasonable for us to do so, we will collect your personal information from you directly, but we may also collect information about you from third parties, as permitted or authorised by law (including by the APPs).

The primary consequences that may result from a failure to provide personal information to us when we request is that we are unable to fulfil the purposes for which we seek the information. For example, we may be unable to provide you with the goods and/or services you request from us if you do not provide us with the personal information we need to process your application. We may also be unable to complete our complaints-handling process or investigate a claim made in relation to our handling or processing of your personal information.