

# Sencia Privacy Policy

## 1 Introduction

Sencia Holdings Pty Ltd ACN 615 957 509 ABN 80 492 216 178, and Sencia Management Pty Ltd ACN 625 452 119 including all members and businesses of our corporate group, (**Sencia, we, us and our**) is committed to protecting the privacy of your personal information. This privacy policy sets out how we handle information about you.

We may modify or amend this privacy policy from time to time. We will display a notice on our website **www.sencia.com.au** for a reasonable period after any such revisions have been made. We will keep the current version of this privacy policy on our website. This privacy policy was last updated on 25 May 2022.

Unless you notify us otherwise, we will assume that you have consented to the collection of all information which is provided to us for use in accordance with this privacy policy.

## 2 What kinds of personal information do we collect and hold?

Personal information is information or an opinion about an individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

We collect personal information from our clients, their representatives, applicants for employment at Sencia, members of the public, suppliers, contractors and service providers.

The personal information we collect depends on the nature of the individual's relationship or interaction with Sencia and our employees. We only collect personal information where it is reasonably necessary for, or directly related to, one or more of our functions or activities.

### Residents

We collect personal information from our residents and prospective residents who apply to live in our villages, which may include:

- names, dates of birth, gender, telephone number, email address and address ;
- contact details, including resident's contact details and the contact details of their next of kin and other legal representatives;
- information about how you have used our online services such as online forms you have filled in and pages you have visited.

We also collect health information (which is sensitive information) from our residents and prospective residents who apply to live in our villages, to provide appropriate services to our residents, and for insurance or employment purposes. Health information we collect may include:

immunization history for COVID – 19 and Influenza We collect other sensitive information from residents and prospective residents who apply to live in our villages such as:

- country of birth;
- biometric data such as an individual's temperature
- current health condition for COVID-19 screening purposes **Visitors**

We collect personal information about visitors and other public who enter our premises to maintain infection control, and records of who is in the premises at any given time, and compliance with government directions and laws.

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This personal information may include:

- Identity and contact details
- Image of you

We also collect sensitive information which may include:

- current health condition for COVID-19 screening purposes
- immunization history for COVID – 19 and Influenza
- biometric data such as an individual's temperature.

### **Contractors, Service Providers and their Representatives**

We collect personal information and business details from our suppliers and contractors and their representatives, so that appropriate financial and business records can be maintained, and we can ensure that the appropriately qualified contractors have been engaged. This may include

- identity and contact details
- Image of individual
- Details of employment
- Relevant licences, permits and qualifications

We also collect sensitive information from our suppliers, contractors and their representatives, so that we can manage infection control at our premises, and comply with any government directions and laws. This may include:

- current health condition in relation to COVID – 19 screening
- immunisation history in relation to COVID – 19 and Influenza
- biometric data such as your temperature

Sometimes we collect information about third parties for the purpose of insurance claims.

### **Employees and Employment Applicants**

We collect personal information from applicants applying for employment with Sencia, including contact details, work histories, curriculum vitae, educational qualifications, permits and licences, training records, competency assessments, details of salary and wages, training records, performance assessments, counselling details and personnel records. Sensitive information is sometimes collected from applicants, such as criminal record check details and relevant medical histories including immunisation history for employment purposes

### **3 How do we collect personal information?**

We may collect personal information when you:

- telephone Sencia or interact verbally or make contact by mail or email;
- access our website or use it to communicate with us, such as through our general enquiries 'Contact Us' form on our website;

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- arrange a private tour of one of our villages;
- apply to live in one of our villages or request for one of our other services to be provided to you; or
- enter one of our villages or head offices
- make enquiries or complaints.

In most cases, we collect information directly from you. Where we collect personal information from another person or organisation, it is dealt with in accordance with the requirements of the Privacy Act.

We may collect information about you from publicly available sources, in the course of conducting market research and from current and prospective suppliers of goods and services to Sencia.

There may also be occasions where we collect information about you from third parties. For example, we may collect personal information from:

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- resident's representatives (e.g. a legal guardian or family member);
- other government agencies (either Commonwealth or State); and
- a contracted service provider that provides services on our behalf, or assists us with our human resources communications, IT or other corporate activities.

### **Employment Applicants**

We collect information about applicants for employment at Sencia:

- directly from the applicants
- through general background check processes such as criminal history checks and reference checks; and
- from other sources such as referees and employment agencies.

You have the right to deal with us on an anonymous or pseudonymous basis, and you do not need to provide us with your personal information. However, if you choose to interact with us on such a basis, or if you do not provide us with personal information when requested, we may be unable to provide you with all of the services that you seek from us, or permitted to allow you entry into our premises.

## **4 Our website**

We may collect data about you from our website using various technologies, including 'cookies'. A 'cookie' is a text file our website transmits to an individual's browser which is stored on the individual's computer as an anonymous tag identifying the individual's computer (but not necessarily the individual) to us. You may configure your browser to disable cookies, but some parts of our website may not function properly (or at all) if cookies are disabled.

Sometimes our websites contain links to other websites. When you access a website other than our websites, we are not responsible for the privacy practices of that site. We recommend that you review the privacy policies of each website you visit.

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### **5 For what purposes do we collect, hold, use and disclose personal information?**

We collect, hold, use and disclose personal information for the primary purposes of carrying out our functions and activities as an operator of retirement villages and related services.

In addition, we collect, hold, use and disclose personal information for the following purposes:

- application assessment, administration of residence agreements;
- to comply with our legal obligations under the *Retirement Villages Act legislation* and other laws in respect of the provision of services and any accommodation to our residents;
- to manage infection control within our premises and comply with government directions;
- to improve our services through quality improvement activities, such as audits and surveys;
- for marketing and related purposes, including to directly send to individuals (subject to compliance with our statutory obligations) information updates, marketing materials and newsletters to people subscribed to our mailing lists;
- to seek the participation of residents and other individuals (each on a voluntary basis) in advertising campaigns, marketing events, launches, residents' testimonials and focus groups;
- complaint management;
- security purposes;
- for the purposes of obtaining professional advice, including obtaining legal advice and participating in legal proceedings;
- in the case of CCTV footage, to investigate incidents, accidents and work issues that arise in providing our services; and
- to arrange for insurance, progress insurance claims and meet occupational health and safety obligations.

#### **Employees and service providers**

We collect, hold, use and disclose information about applicants for employment, our employees and services providers for the following purposes:

- to administer employment arrangements, personnel development and management responsibilities;
- to provide services to our residents;
- for quality improvement and marketing purposes;
- to meet our legal obligations such as our obligations under workplace laws and government directions in relation to infection control; and
- for the administration of job applications, which may include criminal record checking and employment screening.

#### **Direct Marketing**

We may use or disclose your personal information (other than sensitive information) for direct marketing purposes only where we have collected the information directly from the individual, the

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individual would reasonably expect the information to be used for that purpose and a simple means for the individual to opt out of receiving direct marketing communications has been provided (and the individual has not done so).

We may also use your personal information for direct marketing where we have obtained consent to use your information for that purpose.

When we use your personal information for direct marketing purposes or to facilitate direct marketing by another organisation, you may request not to receive marketing communications from us and that we do not use or disclose your personal information to facilitate direct marketing by another organisation.

To opt out of our direct marketing, you can use the unsubscribe facility provided for that purpose in our marketing messages or contact our Privacy Officer, whose contact details are set out at section 11 below.

### **6 Disclosure of your personal information**

In the case of all individuals, we disclose relevant personal information to other persons/ and organisations as required under government directions, and by law.

We may also disclose personal information:

- to State and Commonwealth government agencies;
- to loss adjusters, security companies and insurance companies;
- to service providers, business partners, business advisers and professional advisers, for them to fulfil their obligations owed to us under agreements that we have entered into for the purpose of us undertaking or furthering our business operations and activities;
- to third parties completing market research and surveys on our behalf;
- to third parties in the event our business and/or assets are sold or offered for sale, at or before the time of a merger, acquisition or a sale;
- when required by law or court order, or other governmental order or process to disclose, where we believe in good faith that the law compels us to disclose information;
- if we consider it necessary to do so in order to identify, contact or bring legal action against any third party; and/or
- to Sencia employees where necessary for the performance of their duties and roles, and where they are authorised to access it.

We may disclose your personal information to a third party referred to above that is located outside Australia, however due to circumstances which change from time to time it is not practicable for us to specify the countries in which such third parties are located.

### **Closed Circuit TV (CCTV)**

CCTV recording devices are in place in all of our villages to ensure the safety and security of residents, visitors and employees. The CCTV footage may only be used to investigate incidents, accidents, and work issues. and any issue related to the continued safety of residents, visitors or employees. CCTV footage can be downloaded and held if necessary, as part of an ongoing investigation, with footage saved to file and held securely.

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Residents, visitors and employees are made aware of the presence of CCTV recording devices through signage displayed at the entry to a village. In order to protect personal privacy, footage will not be shown, used or shared in any other way except when required or permitted by law or Court order.

### 7 How do we store personal information?

We store your information securely both in paper form and electronically at our head office and on site (e.g. at a retirement village). We currently use a combination of physical files and secure electronic document management systems to store the information we hold. All of our servers are located in Australia.

Authorised employees and service providers providing residents with services have access to personal and health information electronically where required in order for those employees or service providers to perform their functions.

The information we hold is subject to regular reviews and audits and where it is determined that it is no longer necessary or legally required for us to hold and store personal information, we take reasonable steps to de-identify or destroy the information.

### 8 Protecting your personal information

We are committed to protecting your personal information. Security and access protocols are maintained to ensure that personal information is protected from misuse, interference, loss, unauthorised access, modification and disclosure. These measures include:

- internal access controls and protocols to ensure that only authorised employees or service providers can access personal information in circumstances where they are required to do so;
- tracking and auditing electronic file access to ensure that only authorised access to personal information has occurred;
- using governance mechanisms to ensure the appropriate management of personal information, including maintaining a designated privacy officer role, our Employee Information Guide, audit programs, employee bulletins and training programs; and

conducting a Privacy Impact Assessment for any new project where a significant change to information handling procedures is proposed.

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

#### Access Requests

We will, on request, provide you with access to the information we hold about you, including for the purpose of correcting or updating that information, unless there is an exception to such disclosure which applies under relevant privacy legislation.

Requests for access to personal information can be made using the dedicated forms that are available at Head Office, or by contacting our Privacy Officer directly using the contact details set out in section 11 below.

You may be required to put your request in writing for security reasons. We reserve the right to verify the identity of the individual making the access request before granting access to personal information, in order to ensure that we do not inadvertently disclose personal information to the wrong person.

We will respond to your request within a reasonable period (usually 45 days but often sooner) and provide you with access to the information in the manner requested where it is reasonable and

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practicable to do so. If access is refused, we will give you a written notice which sets out the reasons for refusal and how to complain about the refusal.

For most requests, your information will be provided free of charge, however, we may charge a reasonable fee if your request requires a substantial effort on our part.

### **Requests to update or correct**

We take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. If the personal information we hold about you is inaccurate, incomplete, irrelevant or out-of-date, please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

Requests for updating or correcting your personal information can be made by contacting our Privacy Officer directly using the contact details set out in section 11 below.

If we refuse to correct personal information as requested, at your request, we can add a statement to your record that the information is incorrect, incomplete or out-of-date.

We will respond to requests within a reasonable period of time (usually within 45 days but often sooner) and we will not charge you for the making of the request, the correction, or the adding of the statement.

As noted above, we reserve the right to verify the identity of the individual making the correction request. Additionally, where the correction request is made on behalf of a third party, we reserve the right to refuse to correct the information Sencia holds about the third party until Sencia is satisfied (acting reasonably) that the third party has consented to the correction request being made on his/her behalf.

### **10 How can you complain about a breach of the Act or the APPs?**

We will examine and investigate all complaints concerning breaches of this policy, the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.

If you have any queries or complaints regarding our collection, use or management of your personal information, please contact the applicable residence manager in the first instance. The village manager will review the complaint or enquiry and, if the residence manager is unable to handle the complaint or enquiry, they will direct it to Sencia's Privacy Officer.

If you wish to directly contact Sencia's Privacy Officer about your concerns, you can do so using the contact details set out at section 11 below.

Your complaint will be promptly acknowledged and dealt with within a reasonable amount of time depending on the complexity of the matter.

If you are dissatisfied with our response to your complaint, you have the right to make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

### **11 Contact us**

Individuals who wish to contact Sencia about information privacy or their personal information can do so by contacting our Privacy Officer at:

Email: [privacy@sencia.com.au](mailto:privacy@sencia.com.au)

Telephone: (03) 9559 9600

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Mail: PO Box 2250 Moorabbin VIC 3189