
Privacy Policy

We recognise and value the trust that you place in us to maintain your personal information and to only use and disclose the personal information for the purposes for which the information was collected and otherwise in accordance with the *Privacy Act 1988 (Cth)*.

This privacy policy explains:

- what and how we collect personal information from individuals;
- how we may use such information and to whom the information may be disclosed; and
- the steps we take to protect the privacy of personal information we collect and use;
- how individuals can request to access and correct the personal information we hold, lodge complaints with us in relation to alleged breaches of privacy or to make a query related to privacy.

We may need to modify, amend or replace this privacy policy from time to time. A new version of this policy will be posted to our website from time to time. We recommend that you regularly review this privacy policy.

Scope

We may collect personal information from any individual we have contact with. This may include current and prospective partners of our services, parents, support workers, support coordinators, case managers, local area coordinators, government departments, care providers, anyone involved in the provision of our services, and representatives from current and prospective suppliers.

What personal information do we collect?

For the purposes of this policy, “personal information” is information or opinion that identifies an individual or information or opinion which could reasonably identify an individual, regardless of whether the information or opinion is in a material form or not. It may include (but is not necessarily limited to) an individual’s name, contact details and records of the individual’s dealings with us or with our representatives and care providers.

We may collect a range of personal information about you, including your name, address, telephone number, email address, age and date and place of birth. We may also collect information from you about your family, including your spouse, sibling(s), children and grandchildren and about you from your spouse, sibling(s), children and grandchildren.

We may collect information from you about your service needs, existing conditions, preferences, etc. We may also collect information relating to the provision of our services to you, and your expressed wishes in relation to the services provided and to be provided to you. To the extent that such information constitutes “sensitive information”

under the Privacy Act, we collect this information only with your consent.

We may also collect information about you when you visit our website. The information we collect from visits to our website is generally anonymous, unless you specifically complete and submit to us a form that we make available online via our website. We generally do not use such information to identify specific individuals.

However, due to the Internet’s nature, such information may contain details which could identify a particular individual. Such information includes the IP address of the computer accessing our website, the Internet service provider used to access the Internet and our website, the web-page directing the individual to our website and the individual’s activity on our website.

How we collect personal information

We collect personal information using lawful and fair means and generally only when relevant to our business and activities.

We may collect personal information about an individual from a variety of sources using a variety of means, including:

- a form (either physical or online) or other document that is used in a contract or transaction between us and you that is completed and submitted to us;
- through feedback provided by our partners to us in relation to the services provided, including (without limitation) expressed wishes with respect to the nature and scope of the services provided and to be provided;
- through interaction between us and case managers, facilitators, social workers, parents and any other individual interested in or involved in the provision of services to you;
- a telephone, email or in-person inquiry or discussion about us and/or the services we provide;
- mail correspondence, emails and other electronic means;
- through publicly available sources of information;
- through interactions with our social media channels that we offer or monitor;
- from job applicants and staff members;
- direct contact in the course of us providing services (including the administration of accounts established with us);
- in the course of conducting market research, including partner satisfaction surveys; and
- from current and prospective suppliers of goods and/or services to us.

In addition, we may collect personal information (including sensitive information) about our partners from support workers engaged to provide services to our partners.

We generally collect personal information about an individual directly from that individual, unless it is unreasonable or impracticable for us to do so. Additionally, we generally only collect personal information when we specifically ask for that information.

From time to time, we may receive unsolicited personal information about an individual. In accordance with our statutory obligations, we will determine whether or not we could lawfully have collected such information had we solicited the information. If we determine that we could not lawfully have collected the information then we will take steps to destroy or de-identify that information, except to the extent we are required or authorised to keep the information by law or court order.

Dealing with us anonymously or on a pseudonymous basis

You may interact and deal with us on an anonymous or pseudonymous basis. However, if you choose to interact and to deal with us in this fashion, or you do not provide us with personal information when requested, then we may be unable to provide you with all the services and information that you seek from us.

Further, we may need to verify your identity as part of our response to a request to access and/or correct personal information that we hold about you, or as part of our complaints-handling process. If we are unable to verify your identity, or you continue to engage with us in an anonymous or pseudonymous manner, then we may be unable to satisfy your request.

How we use personal information we collect

As a general principle, and in accordance with our statutory obligations, personal information is only used for the primary purpose(s) for which the information was collected or any secondary purpose that is related (in the case of sensitive information, directly related) to the primary purpose for which you would reasonably expect us to use the collected information or as otherwise permitted by law (including the *Australian Privacy Principles* ("APPs") under the *Privacy Act 1988 (Cth)*).

We will take reasonable steps to make you aware of the purpose for which the personal information collected may be used at or before the time of collection.

We may use personal information collected about an individual for one or more of the following purposes:

- to provide our services to the individual;
- to process transactions and administer partner accounts;
- to address queries and to resolve complaints;
- to send information updates, marketing materials and newsletters to current and prospective partners and other individuals associated with us who have consented (either expressly or impliedly) to receive such information and materials provided that they have not opted out from receiving such information;
- to seek the participation of current and prospective partners and other individuals (on a voluntary basis) in advertising campaigns, events, launches, partner testimonials and focus groups;
- to improve our services, our website, our other means of communicating with our current and prospective partners and our partner experience generally; and
- to directly market our services to current and prospective partners (including through direct mail and direct email to current and prospective partners)

provided that such recipients have not opted out of receiving such communications from us.

We may also use personal information collected about an individual for one or more of the following purposes:

- to assess the suitability of an individual applying for a job with us;
- to assess the suitability of a prospective partner for funding arrangements;
- to assess the suitability of a prospective support worker for the requirements of a particular partner;
- to assess and manage the supply of goods and services to us by a prospective or current contractor or service provider; and
- to assist us in complying with our regulatory and statutory obligations in relation to the support services we provide.

To whom we may disclose your personal information

We may disclose personal information we collect from and about individuals to third parties but only on an as-needs basis and in order to facilitate the fulfilment of one or more purposes for which we collected the personal information, or any secondary purpose related to the primary purpose (directly related in the case of sensitive information) for which we may be permitted to disclose such information by law.

Personal information collected about you (as our partner) may be shared by support workers engaged to provide services to you, for the purpose of providing and improving the standard of care provided to you.

We may disclose personal information to any of the following groups:

- our agents and contractors (including, for example but without limitation, our agents and contractors in order to enable them to perform services under contract with us which may directly or indirectly benefit the individual from whom the information was collected);
- marketing providers to facilitate the provision of marketing;
- professional advisers to facilitate the provision of advice to us; and
- Government departments and agencies, for the purpose of our compliance with our statutory obligations or to facilitate the compliance by the approved provider of its statutory obligations.

We may also disclose personal information, including sensitive information, about a partner to persons authorised by the partner, but only with the consent of the partner.

We may also disclose personal information (including sensitive information, such as health information) about an individual 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 do so disclose the information.

Additionally, we may disclose personal information (including sensitive information, such as health

information) where we are required to do so as a result of any obligations we owe under any contract.

We may disclose personal information such as an individual's IP address and other information collected from visits to its website or through other online interactions by individuals with us in cooperation with Internet service providers to identify users, if we deem it necessary to do so in order to comply with relevant laws.

We may disclose personal information if it is reasonably necessary to do so in order to identify, contact or bring legal action against someone whom we suspect or know is causing harm to, or interference with services we supply, its information technology systems and equipment, or our property.

Personal information about individuals we have collected may be disclosed to third parties in the event we offer to sell and/or sells its business and/or assets, or shares in us or our related entities are sold or offered for sale, at or before the time of a merger, acquisition or sale.

Where we engage third parties to provide products and/or services to us or to our partners on our behalf, those third parties may have access to personal information (including sensitive information, such as health information) that we hold about individuals. We do not authorise those third parties to use any personal information it may disclose or allow the third parties to access to use or disclose such personal information for any purpose other than to facilitate the completion of their obligations they owe to us.

Without limiting the foregoing, we may disclose individuals' personal information to our business partners and advisers, including (but not limited to) auditors, financial services and insurance companies, or to our professional advisers (such as our legal and accounting advisers) for them to complete their obligations owed to us under agreements that we have entered into for the purpose of undertaking or furthering our business operations and activities.

In addition, we may disclose statistics (with personal identifiers removed) about its partners to reputable third parties primarily to assist us improve our service offering.

As at the date of this privacy policy, we do not disclose personal information to an overseas recipient that is not a related third party to us. In the event we disclose personal information to an overseas recipient that is not related to us, we will comply with its statutory obligations in relation to such disclosure.

In particular, wherever it is reasonably practicable, we will first seek the individual's consent to a disclosure overseas of the individual's personal information. Where the individual consents to such disclosure, we will be exempt from the requirements of the Australian Privacy Principles in relation to the information that is disclosed to an overseas recipient.

Where it is not reasonably practicable for us to obtain consent in relation to the information disclosed, we will otherwise comply with the requirements of the privacy legislation in relation to such disclosed information.

You have the right to inform us that you do not wish for us to send information to you other than for the primary purpose for which the information was collected. We will always attempt to ensure that our disclosure of personal information to other parties is carried out in a manner that does not personally identify individuals, to the extent that it is practicable and lawful to do so.

Direct marketing

We may directly market our services to an individual on the basis that the individual would reasonably expect us to do so, where we have already collected the individual's personal information. Where we collect information about an individual from a party other than that individual, we will not use that information to directly market to that individual unless that individual provides us with consent (either express or implied).

In directly marketing our products and services, 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) (including the Australian Consumer Law).

All direct marketing communications which we send will include an easy opt-out procedure if at any time you wish for us to stop sending you marketing communications.

Security

We strive to ensure the security of personal information we collect and hold. We take reasonable steps to protect your personal information from misuse, interference and loss, and from unauthorised access, modification and disclosure.

We regularly review and update our physical and data security measures in light of current technologies. Unfortunately, no data transmission over the Internet or over mobile data and communications services can be guaranteed to be totally secure.

In addition, our employees and contractors who provide services related to our information systems or who have access to personal information we collect and hold are obliged to respect the confidentiality and privacy of any personal information we hold.

We do everything reasonably within our power and control to prevent unauthorised use or disclosure of personal information we collect and hold. However, we are not responsible for events arising from unauthorised use of or access to personal information except to the extent that such unauthorised use or access is as a result of our failure to comply with our legal obligations in relation to the reasonable steps taken to secure the personal information we hold.

Quality of the personal information we hold

We take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of the information we hold largely depends on the accuracy of

the information supplied to us or which we collect. If at any time you discover that any information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, please contact us to correct the information.

Accessing and correcting personal information we hold

Where we hold personal information about an individual, that individual is entitled at any time (upon request) to access the personal information we hold about that individual.

Where we receive a request to access the personal information we hold about an individual, we will respond within a reasonable period of time. Unless it is unlawful or impracticable for us to do so, we will generally provide access to the requested information in the manner requested.

Please note that we are entitled, under the APPs, to charge a reasonable administrative fee to cover our costs incurred in providing access to the personal information we hold about an individual.

Please also note that we reserve the right to verify the identity of the person making an access request, to ensure that we are not inadvertently disclosing personal information to an individual not entitled to access such information.

Further, we reserve the right to redact the information we make available in response to an access request, to protect the privacy of other individuals.

We may from time to time refuse to provide access to the information we hold about an individual, in accordance with the Act and the APPs. Where we refuse access, we will explain the reasons for refusal in writing and provide details in relation to the relevant complaint process.

As noted above, we take reasonable steps to ensure that the information we collect, hold, use and disclose about an individual is complete, up-to-date and accurate. However, if at any time you believe that personal information we hold about you is incorrect, incomplete, outdated or inaccurate, you have the right to request that we amend such personal information. If we refuse the correction request, we will provide written reasons and information about the complaint process should you not be satisfied with our reasons.

Where information about you is correct and the information has previously been disclosed to third parties, we will take reasonable steps to notify third parties of the correction.

Lodging a complaint

If you wish to complain about an alleged breach of the privacy of your personal information, the complaint should be made in writing to us and addressed to the attention of our privacy officer. The details of our privacy officer are set out below.

We will promptly acknowledge receipt of your complaint and we will endeavour to deal with your complaint and to provide you with a response within a reasonable period of time following receipt of your complaint (generally within 30 days of receipt).

Where a complaint requires a more detailed investigation, it may take longer to resolve. If this is the case, then we will provide you with progress reports.

We will verify your identity and seek (where appropriate) further information from you in connection with your complaint.

Where required by law, we will provide our determination on your complaint to you in writing.

Please note that we may refuse to investigate or to otherwise deal with a complaint if we consider your complaint to be vexatious or frivolous.

If you are not satisfied with the outcome of your complaint, you may write to us seeking an internal review of our decision. Such internal review will be completed by an officer not previously involved in your complaint.

If you still remain dissatisfied following the outcome of our internal review, you may escalate the complaint to the Office of the Australian Information Commissioner.

Contact Details

In relation to any query, concern or complaint about how we comply with our privacy obligations, please direct such communications to the following:

The Privacy Officer
Carer Solutions Australia
compliance@carersolutions.com.au

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