

Privacy Policy Alchera Living (Inc)

This Privacy Policy sets out how Alchera Living (Inc) (“we”) collect, manage, store, use and disclose your personal information.

We are bound by the Australian Privacy Principles (“APPs”) contained in the *Privacy Act 1988* (Cth) (“Act”); and we will protect your privacy and your personal information in accordance with the Act, the APPs and this Privacy Policy.

1. What personal information do we collect?

We routinely collect such personal information as we require to perform our core business functions. We also collect certain sensitive information (as defined in the Act). The information we collect may include:

Residents and prospective residents

- contact details (including name, address, telephone number and email address);
- personal details (including date of birth, gender);
- property ownership (specifically, real-estate, where for example the purchase of a unit is contingent on the sale of another property);
- health information and history (including details about medications and health practitioners); and
- bank account details

Employees and other staff

- contact details (including name, address, telephone number and email address);
- personal details (including date of birth, gender, country of birth, citizenship, residency status);
- qualifications, skills and experience;
- information and opinions from referees;
- bank account details;
- police checks and details of any criminal record;
- health information;
- salary information;
- performance review information;
- salary sacrificing information;
- complaints from residents on staff;
- conflict resolution information; and
- other relevant employment related information

2. How do we collect your personal information?

We collect personal information in various ways. We may ask you to complete a form or questionnaire; or we may, for example, ask you to provide personal information at face to face meetings, by telephone, or in writing.

Where possible, we collect personal information directly from you; or alternatively, from your legal representative or other duly appointed person. We may also collect personal information about you from third parties if you have agreed that they can provide us with this information. For example, we may collect information from doctors, other health practitioners, or home care providers. We may also collect information from real estate agents, where for example the purchase of a unit is contingent on the sale of another property.

3. How do we use your personal information?

We generally only use or disclose personal information in accordance with the primary purpose for which it has been collected. In most cases this will be expressly stated or at least readily apparent at the time of collection.

We will not use or disclose your personal information for any secondary purpose (that is, any purpose other than the primary purpose) unless you have consented to the use or disclosure, or the APPs otherwise permit the use. The APPs do, for example, permit use or disclosure for a secondary purpose if:

- you would reasonably expect us to use or disclose the information for that secondary purpose, and the use or disclosure is either directly relevant to the primary purpose (if the information is sensitive) or at least related to the primary purpose (if the information is not sensitive);
- the use or disclosure is required by or under an Australian law or a court/tribunal order; or
- a 'permitted general situation' or a 'permitted health situation' exists under the Act.

General use

By way of illustration, we may in appropriate cases use your personal information for any of the following purposes:

- to assess whether we can safely provide you with our services;
- to maintain and administer your resident file (or employee file, as the case may be);
- to invoice you, and collect (or provide) payments;
- to contact you for follow ups and reminders;
- to keep residents informed about our services and operations.

From time to time, we may also produce publications, promotional material and information brochures which may include photographs, video footage and sound recordings. Wherever practicable, we will obtain your consent prior to using or publishing your image or recording for marketing purposes.

General disclosure

By way of illustration, we may in appropriate cases disclose your personal information to external persons and organisations including:

- external assessment entities and agencies;
- emergency services (including ambulance and police);
- nominated emergency contacts such as relatives or next of kin;
- doctors and other health care professionals;
- referees (in the case of employees and staff);
- our professional advisers;
- parties such as couriers, bulk mail / direct mail distributors, or Australia Post for the purpose of making deliveries to you.

Direct marketing

We will not use or disclose personal information for the purposes of direct marketing without your consent unless the information is collected directly from you or your legal representative and:

- you would reasonably expect us to use your personal information for direct marketing; and
- you have not elected to 'opt out' from receiving any direct marketing materials from us.

Disclosure to overseas recipients

We are unlikely to disclose your personal information to an overseas recipient ourselves; however we draw your attention to the discussion about overseas storage in the following section 4 of this Policy.

4. How do we protect and store your information?

We store personal information in hard copy and electronically. We take steps to protect these records against loss, damage, misuse and interference; and unauthorised access, use, modification and disclosure. We ensure that hard copies of records are kept in locked files or locked offices and there are security processes in place regarding electronic access. We take steps to ensure that electronic data is backed up.

We also provide training to our staff on the policy and the importance of keeping your personal information confidential.

After a period of time we may securely destroy or de-identify your records in accordance with Australian laws. We will take all reasonable steps to destroy or de-identify personal information held once it is no longer required.

Overseas storage

It is not our standard practice to store personal information overseas. However, overseas disclosure and storage may occur indirectly, for example:

- If our contracted data storage providers and/or web hosts use servers, systems and cloud computing providers outside Australia. In this case we will use our best endeavours to ensure that the providers comply with the Act and Privacy Principles or have a privacy policy meeting or exceeding the standard required under the Act and Privacy Principles.
- If we make use of third party websites such as social media sites. In this case the terms and conditions and privacy policies of the websites will govern their use of your information.

We acknowledge the Notifiable Data Breaches scheme, which applies under the Act in the event of a data breach likely to result in serious harm to affected individuals.

5. Accessing your personal information

You have the right to access the personal information that we hold about you. If you wish for access, you can contact us in writing, by email or by telephone and request access to your personal information. Our contact details are set out at the end of this Policy.

We may charge you a fee for access to or copies of your personal information. This charge will be limited to reasonable administrative charges and/or recoupment of our costs (including document retrieval, photocopying, and delivery).

In some circumstances, your request for access may be denied. These circumstances include:

- if we no longer hold any personal information about you;
- if your request is frivolous or vexatious;
- if the information requested relates to existing or anticipated legal proceedings and would not normally be disclosed as part of those proceedings;
- if providing access would be unlawful; and
- if denying access is required or allowed by law.

If we are unable to give you access to the information you have requested, we will give you written reasons for this decision when we respond to your request.

6. Correcting your personal information

It is important that the information we hold about you is accurate, up-to-date and complete.

You have a right to request correction of your personal information. If you are an employee or resident, you are also expected to provide us with any changes to your personal information (including change of address, name, telephone number, email address or health providers) to enable us to update our records.

7. Our contact information and resolving your concerns

You can contact us during our office hours if you have any questions, concerns or a complaint about this Privacy Policy or the way in which we collect, store, use or disclose your personal information.

We will always try to respond to you and address your questions, concerns or complaints within a reasonable time. We will endeavour to resolve any complaint within a reasonable timeframe, usually not exceeding 30 days. However, resolution may take longer if the matter is complex.

This Privacy Policy is available on our website at www.alcheraliving.com.au. You can also contact us and request that we send you a copy of this Policy.

Our contact details for the purpose of this Privacy Policy are set out below:

Contact person	Alan Marshall - CEO
Telephone number	08 9314 5884
Office address	40-44 Worley Street, Willagee, WA 6105
Postal address	As above
Email address	info@alcheraliving.com.au