

CONSUMER PRIVACY AND CONFIDENTIALITY

1. Purpose of Policy

This Policy governs how All About Living Ltd. collects, stores, uses, discloses, and manages personal information.

This Policy also explains the types of personal information we collect, the purposes for which it is collected, how you can request access to and correct personal information that we hold about you, and how you can make a privacy complaint or contact us with your enquiries or concerns. We take your privacy seriously and are committed to open and transparent management of personal information.

This policy aligns to the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APP).

2. What kinds of personal information do we collect and why?

The personal information that we collect, and hold depends on your relationship with us, the nature of the service we are providing or activity you are involved in and the legal obligations we have.

We generally collect and hold both personal and sensitive information, including:

- i. contact details including:
 - a. name,
 - b. occupation,
 - c. address,
 - d. postcode,
 - e. telephone and facsimile numbers,
 - f. email addresses and
 - g. family information;
- ii. demographic information including
 - a. age
 - b. date of birth and
 - c. gender;
- iii. health information including
 - a. medical and family history,
 - b. medications,
 - c. vaccination status,
 - d. diagnostic imaging and reports,
 - e. pathology results, diagnoses (including mental health or disability),
 - f. observations and reported symptoms;
- iv. government related identifiers ;

- v. financial details and billing information including to comply with our legal obligations; and
- vi. treating clinicians' contact details.

If lawful and reasonable to do so, we will destroy and de-identify all unsolicited personal information we receive if we would not normally collect this information, or if the information is sensitive and no consent has been given.

3. How do we collect Personal Information?

We will not collect personal information unless it is reasonably necessary for one of our functions or activities. We will usually only collect sensitive information with your consent.

The sources from which we collect personal information will depend on the circumstances of the collection and may include the following:

3.1 *From you or with your consent*

We will try to collect your personal information directly from you, or alternatively, with your consent. We will collect personal information from you:

- a) if you provide us with information about yourself and, if necessary, your medical condition;
- b) if you complete relevant agreements, applications, forms, surveys, competitions, questionnaires or you communicate with us by taking part in a discussion or forum or by email, telephone, in writing or in person;
- e) if you make a donation to us.

3.2 *From other people*

Where it is unreasonable or impracticable to collect information directly from you, we may obtain personal information about you from a third party. For example, we may collect personal information about you:

- a) from your general practitioner or another healthcare provider who has information about you to assist us in providing services to you;
- b) from a member of your family, a carer, a close friend, your authorised representative or responsible person, next of kin, your nominated emergency contact person or the police;
- c) from any person or organisation that assesses health status or care requirements;
- d) from relevant government departments such as Medicare, the Department of Health or your health insurer to assist us in providing services or processing billing for services provided to you;
- e) from third parties who you have asked to provide your personal information to us

3.3 *From our website*

When you visit our website, our web server may download a cookie to your computer. A cookie is a small piece of information sent by our server to your browser. Cookies do not contain personal information about you but can identify and capture information about a user's browser.

Can I choose to remain anonymous?

We automatically gather anonymous information for monitoring purposes, for example, the numbers and frequency of visitors to our website. This collective data helps us determine how our audiences use parts of our website, so we can improve our services. We may publish or provide this aggregate data to other people or organisations.

If you are receiving aged care or health services from us, it is not practical for you to remain anonymous because we need to keep a record of the care and services provided to you.

We may be able to accommodate you using a pseudonym. However, if you choose not to provide your real identity this may impact the quality of the services provided to you and relevant billing and claiming.

If you wish to use a pseudonym that is linked confidentially to your real identity, please let us know and we will discuss with you any arrangements that can be made.

4. How do we use and disclose personal information?

We may use and disclose personal information for the primary purpose for which it was collected. This includes the use and disclosure necessary to provide services.

We may use or disclose your personal information:

- a) to staff or other service or healthcare providers involved in providing services.
- b) in assessing whether you are eligible for any of our home care services.
- c) to Medicare, the Department of Health or your private health insurer for the purposes of billing.
- d) to government authorities for the purposes of providing aged care or health services.
- e) to funding bodies and government agencies.
- f) to a member of your family, a carer, a close friend, your authorised representative or supporters, next of kin, your nominated emergency contact person or the police.
- g) any third party that you request or authorise us to.

We effectively and securely destroy and de-identify personal information which is no longer required to be retained by us to satisfy any legal, financial and other requirement in accordance with the relevant government standards.

5. Quality of your Personal Information

We will take reasonable steps to ensure that the personal information we collect is accurate, complete, up to date and relevant to the purpose for which it is to be used, both at the time of collection and use.

6. How do we hold and secure Personal Information?

All personal information collected is securely stored on our electronic databases. It may also be held in hard copy files in secure and locked facilities in Australia.

We will take reasonable steps to ensure that the personal information we hold is protected from misuse, loss, interference, unauthorised access, modification or disclosure.

We will notify you, as soon as reasonably practicable, if we find that there has been any unauthorised access, disclosure or loss of your personal information that is likely to result in serious harm or assessed risk to you.

7. How can I access or correct my Personal Information?

You can request access to your personal information held by us, upon written request to our Privacy Officer. To obtain access to your personal information, you must provide us with proof of identity. This is necessary to ensure that your personal information is provided only to the correct individuals and that the privacy of others is protected.

If, upon receiving access to your personal information or at any other time, you believe your personal information is inaccurate, incomplete or out of date, you can notify our Privacy Officer to correct your personal information. We will take reasonable steps to correct the information in a timely manner. We may decline a request for personal information in circumstances prescribed in the Act. If so, we will give you a written notice setting out the reasons for refusal and the complaint mechanisms available to you.

8. Do we use your personal information for direct marketing and can you opt out?

There may be occasions where personal information is used for direct marketing purposes including direct contact, telephone enquiries, email, SMS, letters, internet and web interactions, surveys and other forms of communication.

Any such use will be limited to circumstances where you would reasonably expect us to use or disclose your personal information for that purpose and it has been collected from you, or if you have otherwise consented or requested this information.

You have the right:

- a) to contact us to 'opt-out' of receiving direct marketing communications; or
- b) to request that we provide the source of your personal information where reasonable and practicable.

If you have consented to us providing direct marketing to you and you wish to stop receiving such marketing, please contact us on the details set out in this Policy.

9. How can I complain about the handling of my personal information?

If you believe we have at any time breached this Policy, you may lodge a written complaint with our Privacy Officer on the contact details in this Policy. We will acknowledge your complaint within 14 days of receipt, and finalise the complaint within 30 days of receipt.

If you are not happy with our response, you may lodge a written complaint with the Office of the Australian Information Commissioner using the following link: <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/>

10. Contact details and further information

Privacy Officer

- **Address:** All About Living Ltd. - 609a Robinson Road West, Aspley QLD 4034
- **Email:** privacy@allaboutliving.com.au
- **Phone:** 1300 503 886

Our Privacy Statement is available on our website.

Further information about the Australian Privacy Principles and the application of the Privacy Act can be found at the website of the Office of the Australian Information Commissioner at <http://www.oaic.gov.au>

11. Variations

All About Living Ltd. reserves the right to vary, replace or terminate this policy from time to time.

12. Associated documents

- Privacy Statement

VERSION HISTORY

VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
V0.1		05/05/2024	New draft	Lynne Jones
V1.0	Executive Leadership Team	06/06/2024	Approved Document	Lynne Jones