

Your privacy is important to us. TriCare Ltd (ACN 009 657 345) and its associated companies ("**TriCare**") has set out in this document ("**Privacy Policy**") how we handle your Personal Information.

We must comply with the *Privacy Act 1988*, including the Australian Privacy Principles, regarding our management of Personal Information.

"Personal Information" is information that identifies a person or from which a person can reasonably be identified. It includes information such as your name, address, date of birth, contact details and emergency contacts. If you receive aged care services it may also include "sensitive information" such as your care records, medical history, treatment and advice you have been given by health professionals, and other information relevant to your care or the services we provide.

TriCare collects Personal Information from and about:

- prospective and current residents of our aged care facilities and retirement living facilities.
- people who receive community aged care services from us.
- prospective employees.
- other individuals with whom TriCare has contact.

1. WHY DOES TRICARE COLLECT AND HOLD YOUR PERSONAL INFORMATION?

1.1 The purposes for which we collect and hold Personal Information include:

If you are a prospective resident, resident or receive aged care services:

- to provide you with appropriate ongoing accommodation or care services.
- to comply with the requirements of the *Aged Care Act 1997* or the Retirement Villages laws in the States where our villages are located.
- to determine your eligibility to entitlements under the *Aged Care Act 1997*.
- to determine your eligibility to reside in a retirement village.
- to liaise with your authorised representative and to contact nominated individuals (such as family members) if requested or needed.
- to comply with our obligations to give financial and asset information to the Commonwealth Government to determine our funding entitlements and to set your daily bed fee.
- to enter into contract arrangements for the lease of an accommodation unit within a retirement village complex.
- to meet any other regulatory, legislative or care requirement.

If you are a prospective employee:

- to enable us to properly assess the quality of your application for employment.
- to enable us to contact you if you have been previously unsuccessful and an appropriate position becomes available.

For other individuals with whom we have contact:

- to enable us to contact you.
- to enable us to fulfil any obligation or undertaking relevant to your relationship with TriCare.

2. WHAT TYPES OF PERSONAL INFORMATION DOES TRICARE COLLECT AND HOLD?

If you are a prospective resident, a resident or a person who receives aged care services we may collect and hold:

- information relating to your health and care needs, your lifestyle choices and your health care preferences and wishes.
- information about you that was provided to the Aged Care Assessment Team.
- information about you that was provided to the Commonwealth Department of Health ("DoH").
- Information about your financial status.
- information about your Social Security status.
- information regarding details of your appointed attorneys or other alternative decision makers.
- contact details for your family members.
- information that we are required to collect or hold under the *Aged Care Act 1997* which includes sensitive information relating to your health, health care services and religion:
- records relating to your sales enquiry for entry into a retirement village.
- records relating to contract documentation for a village accommodation unit.
- records about the payment of accounts for village fees (including periodic payments) and recoverable charges. any other information required by regulation, legislation or TriCare's duty of care.

If you are a prospective employee we may collect and hold:

- your resume and any other information provided with your application.
- information gathered during assessment of your application for employment.
- health information directly related to your ability to perform the inherent requirements of the position that we have collected with your consent.

For other individuals with whom we have contact, we may collect and hold:

- Personal contact details.
- Information relevant to your relationship with us.

3. HOW DOES TRICARE COLLECT YOUR PERSONAL INFORMATION?

3.1 Wherever possible we collect information directly from you. However, we may collect "Personal Information" in any of the following ways:

If you are a prospective resident, resident or receive aged care services:

- from you or your authorised representative
 - when completing our enquiry form.
 - during meetings with you.
 - when you and we complete your Residential Care Agreement.
 - during the retirement village acquisition or termination of lease process.
- from a Commonwealth Government agency including Centrelink and Medicare or from an Aged Care Assessment Team.
- from your medical practitioner or other health care professional.

- from other aged care facilities where you have stayed.
- from your authorised representative or family members.

If you are a prospective employee:

- from you.
- from your referees.
- from previous employers.

For other individuals with whom we have contact:

- personally: by mail, internet, phone or face to face.

4. HOW DOES TRICARE USE AND DISCLOSE YOUR PERSONAL INFORMATION?

4.1 We may use or disclose Personal Information in any of the following ways:

If you are a prospective resident, resident or receive aged care services:

- to provide appropriate ongoing care and services, including by communicating with your nominated health professionals.
- to comply with the provisions of the *Aged Care Act 1997* and/or Retirement Villages laws in the States where our retirement villages are located.
- to determine your eligibility to entitlements provided by the *Aged Care Act 1997*.
- to comply with our obligations to provide relevant financial and asset information to the Commonwealth Government to determine our funding entitlements and to set your daily bed fee.
- to liaise with your nominated representative and to contact your family members if you have consented and this is requested or needed.

If you are a prospective employee:

- to enable us to properly assess the quality of your application for employment, including by contacting referees.
- to enable us to contact you if an appropriate position become available.

For other individuals with whom we have contact:

- to enable us to contact you.
- to respond to any inquiries.
- to enable us to meet any undertaking or obligation arising from our relationship with you.

4.2 We may also disclose your Personal Information if we are required to by any law or in response to a subpoena or order of a court or tribunal.

5. HOW DOES TRICARE KEEP YOUR PERSONAL INFORMATION SECURE?

5.1 We may securely store Personal Information at each of our facilities and at our head office in any of the following ways:

- electronically on our computer databases.
- hard copy documents kept within the premises.

- 5.2 We take reasonable steps to ensure the security of Personal Information that we collect and hold including by storing paper records in locked rooms and limiting access to them and for electronic records by including passwords and creating secure electronic files.
- 5.3 We maintain policies regarding who has the authority to access your Personal Information. All our staff are bound by a formal Code of Conduct and our Confidentiality Policy. We educate and supervise our staff to ensure Personal Information is handled in accordance with this Privacy Policy and privacy laws, and with respect and care.

6. HOW CAN YOU ACCESS, CORRECT AND UPDATE YOUR PERSONAL INFORMATION?

- 6.1 You (or your authorised representative) are generally entitled to access Personal Information we hold about you except where access can or must be denied or limited by the *Privacy Act 1988*.
- 6.2 Access to your personal information may be requested by writing to TriCare's Privacy Officer at 250 Newnham Road, Mt Gravatt Qld, 4122 or by email at privacy@tricare.com.au
- 6.3 Requests for access should include:
- if the person requesting information is an authorised representative, proof that the person requesting access is lawfully authorised to do so (such as a copy of the Enduring Power of Attorney appointing the person or an advanced health directive as well as a copy of the person's drivers licence or passport).
 - specific details of the information sought so that we can identify what Personal Information is being requested.
 - the form in which the information is requested (for example, a copy of the information or a request to view the information contained in a resident's records).
- 6.4 Information held by TriCare regarding deceased residents will only be disclosed under the order of a court or tribunal.

Other information about access to your Personal Information

- 6.5 You do not need to provide a reason for requesting access to your Personal Information.
- 6.6 We may charge for providing access to the requested Personal Information. Charges will generally be consistent with fees imposed by the Australian Government for access to documentation under the *Freedom of Information Act 1982*.
- 6.7 We will not charge a fee for lodging a request for access.
- 6.8 We will generally provide access to Personal Information in the form requested unless this is unreasonable or impractical, in which case we may provide the information in another way. For example, if providing information may have an unreasonable impact on the privacy of other individuals we may provide only some of the information.
- 6.9 If you (or your authorised representative) believe the Personal Information we hold is inaccurate, incomplete, not up to date or misleading, you (or your authorised representative) may request that the information be amended and we must take reasonable steps to correct the information. If we do not agree that the information is not accurate, complete or up to date, we may include a statement noting that you do not agree that the information is accurate, up to date, complete, relevant or not misleading.
- 6.10 If we decide not to grant access to Personal Information or we refuse to correct Personal Information we will provide you with written reasons for our decision, the mechanisms available to complain and any other matters that we may be required to tell you under the *Privacy Act 1988* or regulations.

7. COMPLAINTS

- 7.1 If you are not satisfied with our handling of your Personal Information or you believe we have breached our privacy obligations, you can complain in writing to the Privacy Officer listed below.
- 7.2 If you are not satisfied with our handling of or response to your complaint you may also make a complaint to the Office of the Australian Information Commissioner ("OAIC") via the online form on the OAIC website www.oaic.gov.au/about-us/contact-us-page or by contacting the OAIC at GPO Box 2999 Canberra ACT 2601 by phone 1300 363 992 or by fax (02) 9294 9666.

8. HOW TO CONTACT US

Our Privacy Officer can be contacted at:

TriCare Limited
PO Box 439
Mt Gravatt Qld 4122

By phone (07) 3360 9040

By fax (07) 3360 9107

By email privacy@tricare.com.au

www.tricare.com.au