

## Privacy Policy

### 1 Our commitment to privacy

- (1) GenerationCare Pty.Ltd. its related companies, subsidiaries, and affiliates in Australia and overseas (collectively referred to as GenerationCare), is committed to managing Personal Data in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth.) and in accordance with other applicable privacy laws in Australia and elsewhere, including the General Data Protection Regulation 2018 (E.U.) (the **G.D.P.R.**).
- (2) A copy of the Australian Privacy Principles is available at [www.aaic.gov.au](http://www.aaic.gov.au).
- (3) This document sets out our policies for managing your Personal Data and is referred to as our *Privacy Policy*.
- (4) In this Privacy Policy, **we** and **us** refer to GenerationCare and **"you"** refers to any individual about whom we collect personal information (*Personal Data*).

### 2 What Personal Data do we collect about you?

#### 2.1 Prospective and current partners, customers, and clients

- (1) When you enquire about our services or become a partner, customer or client of GenerationCare, a record is made which includes your Personal Data.
- (2) The type of Personal Data that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but will typically include:
  - (a) your name, e-mail, postal address, phone number, and other contact details;
  - (b) information about your employer or an organisation you represent;
  - (c) your occupation;
  - (d) LP. address;
  - (e) blog comments, support queries, testimonials;
  - (f) social media handles; and
  - (g) any additional personal information you provide to us, or authorise us to collect, as part of your interaction with GenerationCare

#### 2.2 Employees, prospective employees, or applicants

- (1) GenerationCare collects Personal Data when recruiting personnel, such as your name, contact details, qualifications, and work history. Generally, we will collect this information directly from you.

- (2) We may also collect Personal Data from third parties (for example, recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number, superannuation information, social media handles, date of birth, and other information necessary to determine your suitability for certain positions.

### **2.3 Other individuals**

- (1) GenerationCare may collect Personal Data about other individuals who are not partners, customers, or employees of GenerationCare. This includes customers and members of the public who participate in events we are involved with, individual service providers, and contractors to GenerationCare, and other individuals who interact with GenerationCare on a commercial basis. The kinds of Personal Data we collect will depend on the capacity in which you are dealing with GenerationCare. Generally, it would include your name, contact details, employer name, blog comments, support queries, testimonials, social media handles, etc.
- (2) If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings, which may or may not identify you.
- (3) In limited circumstances, GenerationCare may collect information which is considered sensitive information. For example, if you are injured at an event promoted or delivered by GenerationCare, we may collect health information about you in an emergency or otherwise with your consent.
- (4) You can always decline to give GenerationCare any Personal Data we request, but that may mean we cannot provide you with some or all of the services you have requested. If you have any concerns about Personal Data we have requested, please let us know.

### **2.4 Visitors to our websites**

GenerationCare handles the Personal Data of visitors to our websites as outlined below.

## **3 How and why does GenerationCare collect and use your Personal Data?**

- (1) GenerationCare collects Personal Data reasonably necessary to carry out our business, to assess and manage our partners' and customers' needs, and provide various services. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering contracts with you or third parties and managing commercial relationships.
- (2) The purposes for which GenerationCare usually collects and uses Personal Data depends on the nature of your interaction with us, but may include:
  - (a) providing services to you or in conjunction with you to third parties;
  - (b) responding to requests for information and other general inquiries;
  - (c) managing, planning, advertising, and administering programs, events, competitions, and performances;
  - (d) researching, developing, and expanding our facilities and services;
  - (e) informing you of our activities, events, facilities, and services;

- (f) recruitment processes (including for volunteers, internships, and work experience); and
  - (g) responding to enquires and complaints.
- (3) GenerationCare generally collects Personal Data directly from you. We may collect and update your Personal Data over the phone, via email, internet, social media, or in person. We may also collect Personal Data about you from other sources, including third party partners, suppliers, and contractors who assist us in our business.
  - (4) GenerationCare also collects and uses Personal Data for market research purposes and to innovate our delivery of products and services.
  - (5) GenerationCare does not collect or store any medical or otherwise sensitive data relating to individuals together with any identifying information.

#### 4 How does GenerationCare interact with you online?

- (1) You may visit our websites without identifying yourself.
- (2) If you identify yourself (for example, by providing your contact details for an enquiry), any Personal Data you provide to GenerationCare will be managed in accordance with this Privacy Policy.
- (3) ***Sensitive Information*** is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information. GenerationCare will only collect, store, or use sensitive information for the primary purpose for which it was obtained, for a secondary purpose that is directly related to the primary purpose, with your consent, or where required or authorised by law.
- (4) GenerationCare websites use cookies - a "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, LP. address, pages you have accessed on our websites and on third-party websites. You are not identifiable from such information.
- (5) You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our websites.
- (6) GenerationCare websites may contain links to third-party websites. GenerationCare is not responsible for the content or privacy practices of websites that are linked to our website.

#### 5 Can you deal with GenerationCare anonymously?

Generally, it is not practicable for GenerationCare to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect Personal Data about you, you may be unable to utilise our services or participate in our events, programs, or activities we manage or deliver.

## 6 How does GenerationCare hold information?

- (1) GenerationCare stores information in hard copy, where appropriate, or other electronic record keeping methods in secure databases (including trusted third-party storage providers based in Australia and elsewhere). Personal Data may be collected in hard copy documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your Personal Data from misuse, interference, and loss and from unauthorised access, modification, or disclosure.
- (2) GenerationCare maintains physical security over paper and electronic data stores, through locks and security systems at our premises. We also maintain computer and network security, for example firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems.
- (3) Our websites use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our websites are encouraged to exercise care in sending Personal Data via the internet.
- (4) We take steps to destroy or de-identify information that we no longer require.

## 7 Does GenerationCare use or disclose your Personal Data for direct marketing?

- (1) GenerationCare may use or disclose your Personal Data for the purpose of informing you about our services, upcoming promotions, events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.
- (2) If you opt-out of receiving marketing material from us, GenerationCare may still contact you in relation to its ongoing relationship with you.

## 8 How does GenerationCare use and disclose Personal Data?

### 8.1 Partners and customers

- (1) The purposes for which we may use and disclose your Personal Data will depend on the services we are providing you. For example, if you have engaged us to deliver a service, we may use and/or disclose information about you to service providers where this is relevant to our services.
- (2) We may also use your Personal Data to:
  - (a) monitor your use of our website, portals, platforms, forums;
  - (b) tailor our products and/or services to suit your specific needs; and
  - (c) contact you for sales and marketing purposes.

### 8.2 Participants at events

- (1) If you are a participant in an event, we may disclose your Personal Data to our partners and customers and venues where this is reasonably necessary for, and relevant to, the delivery of the event. We may use images or audio-

visual recordings which identify you for promotional purposes where you would reasonably expect this to occur.

- (2) We may also use your Personal Data to:
  - (a) monitor your use of our website, portals, platforms, forums;
  - (b) tailor our products and/or services to suit your specific needs; and
  - (c) contact you for sales and marketing purposes.

### **8.3 Disclosure to contractors and other service providers**

- (1) GenerationCare may disclose information to third parties we engage in order to provide our services, including contractors and service providers used for data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance or development, application development, printing, archiving, mail-outs, and market research.
- (2) Personal Data may also be shared between related and affiliated companies of GenerationCare located in Australia and elsewhere.
- (3) Third parties to whom we have disclosed your Personal Data may contact you directly to let you know they have collected your Personal Data and to give you information about their privacy policies.

### **8.4 Use and disclosure for administration and management**

GenerationCare will also use and disclose Personal Data for a range of administrative, management, and operational purposes. These include:

- (1) administering billing and payments and debt recovery;
- (2) planning, managing, monitoring, and evaluating our services;
- (3) quality improvement activities;
- (4) statistical analysis and reporting;
- (5) training staff, contractors, and other workers;
- (6) risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- (7) responding to enquiries and complaints regarding our services;
- (8) obtaining advice from consultants and other professional advisers; and
- (9) responding to subpoenas and other legal orders and obligations.

### **8.5 Other uses and disclosures**

We may use and disclose your Personal Data for other purposes explained at the time of collection or otherwise as set out in this Privacy Policy.

## **9 Our responsibilities under the G.D.P.R.**

- (1) If you are a resident of the E.U. or the U.K., you have certain rights and protections under the G.D.P.R. regarding the processing of your Personal Data.
- (2) We collect, use and store your Personal Data to enable us to provide you with our goods or services and information about them. We rely on the

following lawful means of processing your Personal Data:

- (a) where it is necessary to fulfil a contract with you - this includes where we collect your Personal Data to enable us to send you our goods or provide you with our services;
- (b) where you have given us valid consent to use your Personal Data - we will rely on that consent and only use the Personal Data for the specific purpose for which you have given consent, and this includes where we email newsletters or send mobile phone notifications; and
- (c) we may also process your Personal Data where it is to further our legitimate interests which could include usage statistics, analytics and internal analysis so we can improve our services to you.

## 10 Your rights as an E.U. or U.K. resident

- (1) If you are a resident of the E.U. or the U.K., you have various rights including:
  - (a) right to be informed;
  - (b) right of access;
  - (c) right to rectification;
  - (d) right to object;
  - (e) right to restriction of processing;
  - (f) right to erasure or to be forgotten;
  - (g) right to data portability; and
  - (h) right not to be subject to automated processing.
- (2) If you want to access your Personal Data or ask for the information to be corrected, please contact us. In some circumstances, you also have a right to object to or ask that we restrict certain processing activities or delete your Personal Data. If you would like to limit or request deletion of your Personal Data or exercise any other rights, you can do so by contacting us.

## 11 Our compliance with the G.D.P.R.

- (1) We comply with the G.D.P.R. protection directives set out by the E.U. and the U.K. regarding the collection, use, and retention of Personal Data from E.U. member countries and the U.K.
- (2) All Personal Data stored on our platform is treated as confidential. It is stored securely and is only accessed by authorised personnel. Our collection is limited in relation to what is necessary, for the purpose for which the Personal Data is processed and kept only for so long as is necessary for the purpose for which the Personal Data was collected.
- (3) We implement and maintain appropriate technical, security and organisational measures to protect Personal Data against unauthorized or unlawful processing or use, and against accidental loss, destruction, damage, theft, or disclosure.
- (4) We ensure the encryption and pseudonymisation of Personal Data and we

have adequate cyber security measures in place.

## **12 Does GenerationCare disclose your Personal Data overseas?**

- (1) GenerationCare is a digital technology solution for the healthcare industry. It works with clients, healthcare professionals, therapists, and employment consultants across Australia, the United Kingdom, and elsewhere. However, it is possible that your Personal Data will be disclosed to recipients outside your home jurisdiction.
- (2) Unless we have your consent, or an exception under the Australian Privacy Principles applies, we will only disclose your Personal Data to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles and the G.D.P.R. in relation to your Personal Data.

## **13 How can you access or seek correction of your Personal Data?**

- (1) You are entitled to access your Personal Data held by GenerationCare on request. To request access to your Personal Data please contact our privacy officer using the contact details set out below.
- (2) You will not be charged for making a request to access your Personal Data but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.
- (3) We will take reasonable steps to ensure that the Personal Data we collect, use or disclose is accurate and complete. You can help us do this by advising of any errors or discrepancies in information we hold about you and letting us know if your personal details change.
- (4) However, if you consider any Personal Data we hold about you is inaccurate, incomplete, irrelevant, or misleading, you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.
- (5) We may decline your request to access or correct your Personal Data in certain circumstances in accordance with the Australian Privacy Principles and the G.D.P.R. If we refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your Personal Data about the requested correction.

## **14 Withdrawing your consent**

You can withdraw your consent to our collection or processing of your Personal Data. You can do so by contacting us or by opting out of email newsletter communications by following the instructions in those emails or by clicking unsubscribe. If you withdraw your consent to the use of your Personal Data, you may not have access to our services, and we might not be able to provide you with our services. In some circumstances, where we have a legal basis to do so, we may continue to process your information after you have withdrawn consent. For example, if it is necessary to comply with an independent legal obligation or if it is necessary to do so to protect our legitimate interest in keeping our services secure.

## 15 What should you do if you have a complaint about the handling of your Personal Data?

- (1) You may contact GenerationCare at any time if you have any questions or concerns about this Privacy Policy or about the way in which your Personal Data has been handled.
- (2) You may make a complaint about privacy to GenerationCare at the contact details set out below, addressed to the Privacy Officer.
- (3) The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within one (1) week.
- (4) If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.
- (5) In most cases, we will investigate and respond to a complaint within thirty (30) days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.
- (6) If you are not satisfied with our response to your complaint, or you consider that GenerationCare may have breached the Australian Privacy Principles, or the *Privacy Act*, a complaint may be made to the Office of the Australian Information Commissioner (**O.A.I.C.**). The O.A.I.C. can be contacted by telephone on 1300 363 992 or via the website [www.oaic.gov.au](http://www.oaic.gov.au).

## 16 Updates to this Privacy Policy.

GenerationCare may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website, <https://generationcare.com.au/> regularly to keep up to date with any changes. If you require a copy of this Policy, contact us at [info@generationcare.com.au](mailto:info@generationcare.com.au)

## 17 How can you contact GenerationCare?

The contact details for GenerationCare can be found on our website.