

PRIVACY POLICY

1. OUR PRIVACY COMMITMENT

We are committed to being open and transparent about how we manage your personal information (and when an enduring power of attorney is acting on behalf of a resident, the personal information of that resident).

Our Privacy Policy aims to communicate, in the clearest way possible, how we treat your personal information. We encourage you to read this Privacy Policy carefully. It will help you make informed decisions about sharing your personal information with us.

At Oceania we have a few fundamental principles:

- We will **always** collect, store, use and disclose personal information in accordance with all applicable privacy laws. However, we have also put in place this Privacy Policy to protect personal information you submit or we collect.
- We will **only** use your personal information when it is necessary for us to deliver you our services or perform other necessary business functions and activities.
- We will **not** use or disclose your personal information for purposes unrelated to our business activities and the services we provide for individuals, unless we first obtain your consent.

2. PRIVACY POLICY

This Privacy Policy sets out how we comply with our privacy obligations under the Privacy Act 2020 ("**Act**").

We are bound by the requirements of New Zealand privacy laws, which regulate how we may collect, store, use and disclose your personal information. Those laws also specify other requirements, such as how individuals may access, correct and delete information held about them.

When we say "personal information" we mean identifiable information about you (and when an enduring power of attorney is acting on behalf of a resident, "personal information" includes identifiable information about that resident), such as names, emails, addresses, telephone numbers, work experience, qualifications and so on. When we say "sensitive information" we mean a special category of personal information containing information regarding racial or ethnic origin, political opinions, religious beliefs, genetic data, health information and so on.

In this Privacy Policy "we", "us" and "our" and "Oceania" collectively refers to Oceania Healthcare Limited and its related companies and affiliates (which includes Oceania Care Company Limited, Oceania Village Company Limited and Oceania Group (NZ) Limited).



3. YOUR CONSENT

Oceania operates in the New Zealand residential aged care and retirement village sectors, providing a full range of residential aged care services (including rest home, hospital and dementia level care) at its aged care facilities as well as offering residents villas and apartments within retirement villages. Our business relies on the collection of personal information that is submitted by you, or with your authority, to enable us to provide care and other services in the aged care and retirement village sectors. (“**Services**”).

4. CHANGES TO THIS PRIVACY POLICY

We may amend the terms of this Privacy Policy from time to time and we will notify you of any changes by posting an updated version on our website or by sending you a notice via email. It is your responsibility to check this Privacy Policy periodically for changes and to keep your email address current.

Your continued use of our Services following notification of any changes to this Privacy Policy constitutes acceptance of those changes. If you do not agree with any aspect of the updated Privacy Policy, you must immediately cease all use of our Services.

5. WHAT INFORMATION DO WE COLLECT?

Information you provide to us directly: Our usual practice is to collect personal information directly from you, when you complete any form, including online forms, sign our Admission Agreement or otherwise register to use any of our Services, or provide any other information in connection with your use of our Services. A few examples include:

- Personal details such as: your given name(s), to display on our Resident Directory Board and your bedroom door; photographs of you, to include with information about our events and celebrations that you attend, or for the purposes of identifying you, or for recording aspects of your health or treatment (in which case we will always maintain your photographs recording your health or treatment in accordance with applicable privacy laws, including the Health Information Privacy Code 1994).
- Demographic information such as: gender; date of birth; age; title; spoken language(s).
- Your nominated representative(s) such as: the given name(s) and contact details of your family members or nominated representatives.
- Health information such as: information about your health (including your medical history), information about any disabilities you have (or have had), information about any health services or disability services that are being (or have been) provided to you, or information about you which is collected before or in the course of (or incidental to) the provision of any health service or disability services to you.
- Consent records such as: records of any consent you may have given and the subject matter of that consent.
- Personal care and welfare such as: copies of any enduring powers of attorney in relation to personal care and welfare and/or property that you have executed and



not revoked at the time of your admission, together with relevant contact details of the appointed attorneys.

Sensitive information: We may collect or obtain sensitive information (such as health information) directly from you or from any other source with your authorisation.

Information we get from third parties: We collect or obtain personal information from authorised third parties (e.g. credit reference agencies, law enforcement agencies). This includes information such as public information, competency or medical tests, or background checks such as with a credit agency, referee or other source in order to check, exchange or provide information in relation to you.

Information we collect automatically: We may collect personal information about you automatically when you visit our website or use our Services, like your IP address and device type. Some of this information may be collected using cookies and similar tracking technologies.

Information we create in the performance of the Services: We may also create or obtain personal information, such as evaluative records about your interactions with us, and any interactions we have with your nominated representatives. Evaluative information may be confidential to us.

Information you make public: We may collect or obtain your personal information that you manifestly choose to make public, including via online channels such as social media (e.g. LinkedIn, Facebook etc).

You can always choose not to provide your personal information to Oceania, but it may mean that we are unable to provide you with the Services.

6. HOW IS YOUR PERSONAL INFORMATION PROCESSED?

Where we collect personal information or sensitive information, we will only process it:

- To perform a contract with you or to provide the Services to you; or
- Where we have legitimate interests to process the personal information or sensitive information and these interests are not overridden by your rights; or
- In accordance with a legal obligation; or
- Where we have your consent.

Oceania collects your personal information so that we can provide you with the Services and any related services you may request. In doing so, Oceania may use the personal information we have collected from you for purposes related to the Services including:

- To process and administer the Services (including storing your personal information in InterRAI and any clinical management system), and to help us develop, improve, manage, administer and facilitate our Services and business operations;
- To contract with authorised individuals (such as your nominated representatives);
- To process your personal information for Oceania's internal business purposes;



- To verify your identity and application/admission details;
- To contact any credit agency, referee or other source in order to check, exchange or provide information in relation to you;
- For general internal purposes (such as record keeping, database management, training, billing);
- To assist with the resolution of any issues relating to you or the Services;
- To liaise with the DHB for the purposes of fulfilling our obligations under our contract with the DHB, including during the course of or following an audit of any type of our facilities by the DHB, or where it is necessary for the purposes of our contract with the DHB;
- To provide health information about you where validly requested to do so under the Privacy Act or any Code issued under that Act relating to any health information we hold;
- To provide any information and records regarding your health and treatment to any person properly appointed to audit our Services;
- To enquire as to progress with any application for a government subsidy and to supply information where practicable in respect of such subsidy;
- To comply with all laws and regulations in all applicable jurisdictions; and
- To communicate with you, your family members and your nominated representatives.

By using the Services, you consent to your personal information and sensitive information being collected, stored, used and disclosed in this way and for any other use you authorise. Oceania will only use your personal information for purposes described in this Privacy Policy, or with your consent.

7. IN WHAT VERY LIMITED CIRCUMSTANCES MIGHT WE DISCLOSE YOUR PERSONAL INFORMATION?

Your personal information will not be sold, traded, rented or otherwise provided to others without your consent.

We will only disclose your personal information outside Oceania and its related companies if it is necessary and appropriate to facilitate the purpose for which your personal information was collected pursuant to this Privacy Policy, including the provision of the Services, or a directly related purpose. This may include, for example, disclosure of personal information to:

- Verify your identity and application/admission details;
- Contact any credit agency, referee or other source in order to check, exchange or provide information in relation to you;



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- The DHB for the purposes of fulfilling our obligations under our contract with the DHB, including during the course of or following an audit of any type of our facilities by the DHB, or where it is necessary for the purposes of our contract with the DHB;
- Any person properly appointed to audit our Services;
- Third party service providers, including any sub-contractors, to enable us to provide our Services; and
- Researchers who assist us to find and place potential candidates.

We will not otherwise disclose your personal information unless we believe on reasonable grounds that you have provided your authorisation. However, you should be aware that we may be required to disclose your personal information without your consent in order to comply with any court orders, subpoenas or other legal process or investigation including by tax authorities, if such disclosure is required by law, or if we consider it necessary to reduce a serious threat to an individual's life or health or to the health or safety of the general public. Where possible and appropriate, we will notify you if we intend to disclose your personal information in these limited circumstances.

8. INTERNATIONAL DATA TRANSFERS

In connection with providing the Services, you accept that your personal information may be disclosed to recipients in, or transferred to, or processed in, countries other than New Zealand. We may provide your personal information to third parties in countries other than New Zealand if we have reasonable grounds to believe the recipient is required to protect your personal information will be protected in a way that, overall, provides comparable safeguards to those required by New Zealand's privacy laws.

However, there may be differences between New Zealand's privacy laws and those of the overseas locations in which we may store and process your personal information. If we cannot ensure that recipients in those locations are required to protect your personal information using comparable safeguards to those under New Zealand's privacy laws then we will only provide your personal information to those recipients if you authorise us to do so.

For further information, please contact us using the details set out in the contact section below.

9. STORAGE AND SECURITY

We are committed to protecting the security of your personal information and we take all reasonable precautions to protect it from unauthorized access, modification or disclosure.

Oceania implements and maintains organisational and technical security measures that are designed to provide reasonable protection against the loss, interference or misuse of your personal information and to prevent unauthorized access, modification or disclosure of that information.

10. EMAIL, TEXT AND TELEPHONE COMMUNICATIONS



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We are committed to full compliance with the Unsolicited Electronic Messages Act 2007.

By subscribing to emails and/or text communications, or otherwise providing your email address and/or mobile number, you consent to receiving emails and/or texts (as the case may be) which promote and market our products and services, or the products and services of others, from time to time.

You can unsubscribe from our email communications and/or text communications at any time by clicking the “Unsubscribe” link in any promotional or marketing email or text received or by emailing privacy.officer@oceaniahealthcare.co.nz

Once you have unsubscribed from the email or text communications, you will be removed from the corresponding marketing list as soon as is reasonably practicable.

11. HOW YOU CAN ACCESS OR CORRECT YOUR PERSONAL INFORMATION

It is your responsibility to ensure that the personal information you provide is accurate, complete and up-to-date.

You may request access to the information we hold about you, or request that we update or correct any personal information we hold about you, or ask us to restrict or cease processing your personal information or even delete your personal information, by setting out your request in writing and sending it to us at privacy.officer@oceaniahealthcare.co.nz

We will review your request as soon as reasonably practicable to comply with our legal obligations. If we are unable to give you access to the information you have requested, we will give you reasons for this decision when we respond to your request.

12. RETENTION

The length of time we keep your personal information depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you’ve requested or to comply with applicable legal requirements such as money laundering and financial reporting legislation).

We’ll retain your personal information for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our internal retention policies and practices. Following that period, we’ll make sure it’s deleted or anonymised. Otherwise, as a general rule, we only keep your personal information for as long as we require it for the purposes of providing you with our Services.

13. PRIVACY OFFICER

We take your concerns seriously. If you have any questions or concerns about privacy or the use or collection of your personal information by Oceania please contact our Privacy Officer at privacy.officer@oceaniahealthcare.co.nz or call us on 0800 333 688.

We may request that you provide us with your questions or concerns in writing. We will respond as quickly as possible (our target response is 20 days) and handle all complaints in a way that is fair and consistent. However, if you remain dissatisfied, you can make a formal complaint with Office of the Privacy Commissioner (visit <https://www.privacy.org.nz/> or call 0800 803 909 for further information).



14. PUBLICATION

This Privacy Policy is available on Oceania's website, www.oceaniahealthcare.co.nz.

15. REVIEW

This Policy was reviewed by the Board in December 2020 and will be reviewed at least once every 24 months.



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