



## **Bondi Beach Astra Privacy Policy**

### **Privacy Policy**

Bondi Beach Astra is a private family-owned company that provides care and accommodation services to older Australians and other related services and products.

We are committed to protecting your privacy. This Privacy Policy outlines how we will collect, hold, use and disclose your personal information. We are committed to complying with our obligations under the Australian Privacy Principles, the Privacy Act 1988 (Cth) and various commonwealth, state and territory laws relating to our dealing with personal information including health records.

By applying for or using any of the products or services we provide, or providing us with your personal information, you agree to your personal information being collected, held, used and disclosed as set out in this Privacy Policy. You can download a PDF file version of the Privacy Policy.

We collect personal information about you to assist in providing products and services you have requested and in promoting our products and services. We collect this information directly from you or in accordance with the law. We may collect your personal information from others if it is not reasonable to collect that information directly from you. If we cannot collect this information we may not be able to provide products or services to you.

Where necessary in the course of providing products or services to you, or for the ordinary administration of our business, we may disclose information about you to other persons such as service providers, medical and allied health professionals, government agencies and statutory authorities. In certain circumstances, we may disclose information about you to other persons where permitted or authorised under the Privacy Act, state and territory laws relating to our dealing with health records, or other applicable laws.

Our Privacy Policy contains information about accessing and seeking correction of your personal information and making a privacy-related complaint. If you would like to request access to, or the correction of, information we hold about you, please contact us in writing by:

- email to [office@bondiastra.com.au](mailto:office@bondiastra.com.au)
- mail to Village Manager, Bondi Beach Astra, 34 Campbell Parade, Bondi Beach, NSW 2026

Bondi Beach Astra is a trading name of Bondi Beach Astra Retirement Village Pty Ltd (ABN 83 002 572 287).

### **What personal information do we collect and hold, and how do we collect it?**

To provide you with the products or services that you have requested, we need to collect certain personal information from you. Whenever it is reasonable and practicable to do so, we will collect your personal information directly from you. Depending on the product or service you have requested, we may also collect sensitive information from you.

The type of information we collect will depend upon the type of product or service you have requested from us and may include your:

- personal information

- name, gender, and date of birth
- contact details including phone numbers, address, and email address(es)
- identification documentation for the purpose of verifying identity
- financial information including your financial institution account information
- government identifiers such as Medicare number
- location information
- sensitive information
- health information
- video, images, audio, and other data from monitoring devices (e.g. CCTV, personal care alarms)
- photographs we take of you with your permission, and physical or digital signatures
- online personal information such as usernames and social media usernames, and details/history relating to activity with our digital services

We may collect personal information (including sensitive information) from you in a number of ways, including:

- in writing, including through forms
- over the Internet, including via our website, apps, email, online forms, and surveys
- verbally over the phone, or in person
- through monitoring devices

Where it is reasonable and practicable, we will endeavour to collect your personal information directly from you. If we are unable to collect the information directly from you, we may also collect information from others including:

- your family members
- your appointed representatives (e.g. enduring guardian)
- medical practitioners, allied health providers or other professional experts
- our service providers such as medical and allied health professionals and agents or subcontractors of any of those providers
- our agents or distributors
- third party sources including social media channels (if you interact with us through those channels)
- statutory authorities or government departments
- publicly held information including public registers or websites

#### **What if you do not provide all the information we have requested?**

You do not have to provide us with your personal information. However, if you do not we may be unable to assist you or provide you with a product or service.

#### **For what purposes do we collect, hold, use and disclose personal information?**

We collect, hold, use and disclose your personal information to:

- answer an enquiry you make
- assess an application for retirement village services
- enable medical practitioners, allied health providers or other professional experts to provide care and services to you
- inform you of other products or services that we may provide

- conduct research including market research
- assess an application for employment or volunteering with us
- monitor and assess the effectiveness and appropriateness of our products and services
- maintain and improve our products and services, auditing, quality assurance and training
- any other purposes communicated to you at the time we collect your personal information, or you otherwise agree to with respect to our products or services

These are known as the primary purposes for collecting your personal information.

We may also collect, hold, use or disclose your personal information:

- where you have consented to the collection, use or disclosure, for example under any agreement you enter into with us, including through our website and other marketing related activities where you have voluntarily provided information
- for a secondary purpose that is related to the primary purpose where you would reasonably expect us to use or disclose that information for that secondary purpose
- if we reasonably believe that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to an individual's life, health or safety, or a serious threat to public health or public safety as authorised or required by law

We may disclose your personal information to:

- our agents and service providers and related entities
- your family members or other persons authorised by, or responsible for you
- health service providers including allied health professionals, medical practitioners, and other external health agencies
- our professional advisors
- other parties to whom we are authorised or required by law to disclose information

Where we engage medical practitioners, allied health providers, or any other service providers, agents, contractors or distributors, we take reasonable steps to protect the privacy of all personal information disclosed and require them to comply with all relevant privacy laws.

#### **Do we use your personal information to directly market and communicate with you?**

We may use or disclose your personal information and contact you by mail, telephone, SMS, email, or other electronic means, to provide you with information and offers about our products and services or products and services offered by other organisations. You can contact us at any time to 'opt out' of receiving these communications by emailing [office@bondiastra.com.au](mailto:office@bondiastra.com.au) or simply following the instructions in the relevant communication.

#### **How do we hold and secure your personal information?**

We hold your personal information in a combination of hard copy and in electronic form. We take reasonable steps to ensure that your personal information we hold is protected against misuse, loss, unauthorised access, modification, or disclosure.

We strive to ensure that our contractual arrangements with all other service providers include an obligation that the recipient of the information complies with privacy laws to maintain the security of your personal information.

We hold your personal information for as long as it is required to provide you with products or services, or for any period we are required to keep that information by law. If we no longer require

your personal information for any purpose, we will take reasonable steps to securely destroy or permanently de-identify that information.

### **Online privacy**

Bondi Beach Astra's website may use cookies which may help us to identify you, your browser, or your device while you are using our site. We may also allow carefully selected third parties (such as social media platforms) to use cookies, pixels, and ad tags while you are browsing our website.

For more information about cookies, how to opt out, and the steps you can take to protect your privacy on the Internet, go to [www.youronlinechoices.com](http://www.youronlinechoices.com). This website is operated by the Internet Advertising Bureau, the industry body for online advertising. If you would prefer to restrict, block, or delete cookies from our website, you can do so in your browser settings. If you choose to disable cookies, please note this may limit the way in which you use our website.

Articles on our website may include embedded content (e.g. videos, images, text etc.). Embedded content from other websites behaves in the same way as if you had visited that other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content.

We may use analytics information about your use of the Bondi Beach Astra website and technical information (including about your device or where you are accessing our website from) to optimise our service and to improve our website, services, marketing, and customer relationships and experiences.

We may use your personal information (such as your name or photograph) in online publicity materials, provided that you have given us your consent.

The Bondi Beach Astra website is protected by an SSL certificate and accessed using https rather than http. This means that all information that is sent and received on this website is encrypted for additional security. This information is visible in the address bar of your web browser.

### **How can you access and correct your personal information?**

You can request access to your personal information that we hold.

So that we can consider your request efficiently, we may ask you to submit your request in writing or may ask you to complete a form.

We may charge you a reasonable fee to cover matters such as retrieving, copying, and sending out the information, but we will not charge you just for making the request.

We may decline a request for access to your personal information, including where we no longer hold the information, or where we are required or permitted by law not to provide access to the information requested. If we are not able to meet your request for access, we will let you know why.

We take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, up to date and complete. However, we rely on you to advise us of any changes to your personal information to achieve this. If you believe that any personal information we hold about you is inaccurate, incomplete or out-of-date, you can contact us and we will update your personal information.

### **How can you make a complaint regarding your privacy?**

If you have a complaint about our handling of your personal information or you believe there has been a breach of the Australian Privacy Principles or this Privacy Policy, please contact us by:

- mail to The Village Manager, Bondi Beach Astra, 34 Campbell Parade, Bondi Beach, NSW 2026
- phone on 02 9365 3344
- email to [office@bondiastra.com.au](mailto:office@bondiastra.com.au)

We will endeavour to resolve all complaints as efficiently and effectively as possible and in accordance with our complaint handling procedure in place at that time. If you are dissatisfied with our response or the handling of your complaint, you may contact the Office of the Australian Information Commissioner by:

- mail to GPO Box 5218, Sydney, NSW 2001
- phone on 1300 363 992
- email to [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

#### **How do we make changes to this Privacy Policy?**

We may change this Privacy Policy at any time. Any change that is made shall be effective from the time that the updated Privacy Policy is posted on our website.

Your continued use of our products or services, or provision of further personal information to us after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

Bondi Beach Astra is a business name of Bondi Beach Astra Retirement Village Pty Ltd (ABN 83 002 572 287). This Privacy Policy applies to Bondi Beach Astra and any related entity unless specified otherwise by a related entity.

Last updated 7<sup>th</sup> December 2022