

Japara Privacy Policy for Premises Access

Japara Healthcare Limited (ACN 168 631 052) and its subsidiaries (**we, us or our**) are committed to respecting the privacy rights of all visitors and staff who attend our residential aged care homes or other premises (**Japara Premises**).

We are also committed to complying with all applicable privacy laws which govern the use of personal information.

We may, from time to time, review and update this Privacy Policy to comply with changes to laws and regulations, or to include new or revised practices and technology.

1. What information do we collect?

We require you to provide us with certain information (including personal information) as a condition of entry to Japara Premises.

Information collected by us may include (but is not limited to) the following:

- your name and contact details (including phone and email address);
- your responses to health and hygiene questions, including your temperature;
- your responses to travel, attendance and contact questions relating to COVID-19;
- your reason/s for your visit and who you are visiting;
- your current immunisation status for influenza; and
- your photographic image.

Information may be required to be collected and/or reconfirmed or updated each time you visit Japara Premises.

As a further condition of entry to Japara Premises, each time you visit we require you to register the visit with the applicable State Government by using its contact tracing check-in QR code app.

2. How do we collect information?

We may collect information in paper and electronic form, including by way of QR code technology. This technology captures your information on an electronic device, such as a mobile phone, and is downloaded to us (or our technology service provider/s) for storage and our use.

3. How is your information used?

We use the information we collect about you for screening purposes in determining whether you can access Japara Premises.

We may also use the information for COVID-19 outbreaks purposes. This may include providing the information to responsible third parties such as health departments and other regulatory authorities for tracing and contact purposes.

If you choose not to provide your information to us for the purposes set out in this Privacy Policy, access to Japara Premises may be denied to you.

4. Disclosure of your information

We do not disclose your information without your permission, unless the disclosure is:

- in accordance with this Privacy Policy; or
- otherwise required or authorised by law.

Your information is only accessible to our authorised staff. However, we may confidentially disclose your information to our technology service provider/s in certain limited circumstances, for example should our information capture platform experience a technical problem or to ensure that it operates in an effective and secure manner.

5. Storage and security of the information held by us

We aim to keep your information secure. We will take reasonable steps to ensure that the information we hold about you is protected from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

This includes how we store your information, both electronic and hardcopy, who has access to your information and how we destroy your information when it is no longer required to be held.

Any information that is collected by way of QR code technology or which is otherwise held on our or our technology service provider/s computer systems is stored in Australia and protected by safeguards including physical, technical (e.g. firewalls, encryption and back-up) and procedural methods.

We remain responsible for your information if disclosed in certain limited circumstances to our technology service provider/s, with appropriate disclosure and handling protocols being in place.

If we find that we have no further need for your information and we are otherwise not required by law to retain it, it will be destroyed by us or our technology service provider/s by a secure means.

6. Updating and accessing your information

We take all reasonable steps to ensure that any information we collect, hold and use is accurate, complete and up-to-date.

To assist us, we ask that you provide true, accurate, current and complete information about yourself as requested. We also ask that you let us know if information about you changes and properly update the information you have provided to us to keep it true, accurate, current and complete. You can update the information we hold about you by using our QR technology (where available) or otherwise in writing using appropriate forms available at Japara Premises.

You are entitled to access the information that we hold about you. Please provide a written request, including a description of the information you require, by contacting our Group Privacy Officer in any of the ways detailed in Section 7 below.

7. Compliance

If you:

- have queries or concerns about this Privacy Policy or our information collection and handling processes; or
- wish to make a complaint in relation to a breach of your privacy,

please send written details to our Group Privacy Officer by email at: GPO@japara.com.au or mail at: PO Box 16082, Collins Street West, Victoria, 8007.

We will record your communication and respond to you within a reasonable period of time.

Where we receive a complaint in relation to a breach of privacy, we will conduct an internal investigation to determine if a breach exists. We will notify you of the outcome of the investigation within a reasonable period of time and take steps to remedy any breach as soon as reasonably practicable.

If you are not satisfied after the above process or wish to raise privacy concerns externally, you are entitled to make a complaint directly to the Office of the Australian Information Commissioner.

Updated on 5 July 2021