

# GOLDEN AGE PLACEMENTS PTY LTD: PRIVACY POLICY

## 1. PRIVACY POLICY

GAP respects your privacy and is committed to protecting the privacy and confidentiality of personal information provided to us by you.

In this Policy, GAP means Golden Age Placements Pty Ltd (ACN 610 899 977).

Please note that our Privacy Policy accords with the Commonwealth Privacy Act 1988 (Privacy Act) (as amended) as read with the Australian Privacy Principles which govern the collection, use, handling and disclosure of personal and sensitive information. This policy explains how GAP protects your privacy and summarises how we collect, use and disclose personal information that you might provide us. When you use our services from GAP, you consent to us using and disclosing your personal information consistent with this policy. This policy is applicable to personal information that we hold about you in Australia.

In this policy we also explain how you can contact us if you have a query about any personal information that GAP may be holding about you.

## 2. ABOUT GAP

GAP's director, Martina Costanzo, has more than 35 years' experience across various sectors of health care, and has spent the past 6 years working for aged care providers to help step clients through the maze they have to navigate when placing loved ones in an aged care home. This has enabled her to develop an in-depth knowledge of the Aged Care Act and a profound understanding and appreciation of the consumers' needs and perspectives.

Martina has established GAP to smooth the journey into residential care for her clients. She provides independent information, assistance and clarity through a process which is very stressful and complex for many people. GAP's service also includes appropriate recommendations to other entities such as aged care financial advisors, legal, relocation assistance and care at home, if required.

## 3. COLLECTION OF PERSONAL INFORMATION

When you use our services or purchase goods from GAP, we need to collect certain information from you. That information may include your:

- name;
- address (including previous addresses);
- information about you, particularly in relation to your aged care needs;
- information about relevant aged care documentation and copies of such documentation;
- contact telephone number(s);
- e-mail address(es);
- credit card details;
- account usernames;
- IP addresses;
- usage information; and
- other personal information related to the above.

## 4. WHAT ABOUT SENSITIVE INFORMATION?

We will only collect your sensitive information with your consent and where it is necessary to provide you with our products and services. We will only use and disclose your sensitive information for the primary purpose for which it was collected or a purpose that is directly related to this primary purpose and reasonably expected. Otherwise, we will not collect, use or disclose sensitive information about you unless required to do so by law. Sensitive information, as defined by law, is any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

## 5. PURPOSE OF COLLECTION

Personal information is collected to enhance our business relationship with you and to facilitate the provision of our services. In the provision of our services, we may provide information to agents to take actions or make enquiries. We may also access your information to send you information about our activities or developments or new products that we believe will be of interest to you.

## 6. USE AND DISCLOSURE OF INFORMATION

We strive to build a rewarding and lasting relationship with every client. In order to provide the level of service we believe you expect from us, we may use and disclose your personal information for the following purposes:

General purposes:

We use your personal information to:

- provide the services that you request;
- do all things necessary to administer those services;
- research, develop, manage, protect and improve our services;
- conduct customer satisfaction surveys and inform you of any improvements that we have made to our services;
- maintain and develop our products;
- conduct appropriate checks for credit worthiness and to prevent fraud;
- the management, protection and development of our business;
- provide you with information about other products and services that may be of interest to you;
- assist in arrangements with suppliers in relation to the provision of a service;
- collect and process payments, through us or a third party;
- perform all other administrative and operational tasks;
- investigate, detect and protect us and other third parties against negligence, breach of contract, fraud, theft and other illegal activities.

We may disclose your personal information to other related and non-related organisations including:

- your company or organisation if you use our services under a corporate account;
- our contracted service providers (including any market research company and our mail house);
- credit card providers;
- credit reporting and fraud checking agencies;
- debt collection agencies, in the event of your default in payment of monies owed to us;
- government, regulatory and law enforcement agencies where the disclosure is required or authorised by law;
- our professional advisors, including our accountants, auditors and lawyers;
- our related entities;
- suppliers of products or services which you have selected;

## 7. CROSS-BORDER DATA FLOWS

Currently we do not share any information with entities overseas.

## 8. USE OR DISCLOSURE FOR DIRECT MARKETING PURPOSES

We may use and disclose your personal information to offer you products and services provided by GAP and related entities. You can choose not to allow us to use or disclose your personal information for direct marketing purposes by contacting us (see clause 12 below).

## 9. PROTECTION OF INFORMATION

We take reasonable steps to protect all of the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure. This protection applies in relation to information stored in both electronic and hard copy form.

## 10. ACCESS TO PERSONAL INFORMATION

You may access any personal information that we hold about you subject to certain exceptions. We will normally provide access without charge unless you request access to a large volume of information or we have to access our archived records to obtain the information. In these circumstances, we may impose a fee to recover our reasonable costs. Details of how to contact us are set out in clause 12 below.

## 11. UPDATING PERSONAL INFORMATION OR PREFERENCES

If you believe that any of the information that we hold about you is not current or incomplete, please let us know and we will update your details. We take reasonable steps to ensure that we hold current information about you, but it is very helpful if you can pass on to us any changes to your personal details or preferences. Details of how to contact us are set out in clause 12 below.

## 12. WHO TO CONTACT FOR FURTHER INFORMATION

If you have any questions about how we handle your personal information or if you believe that we have handled your personal information inappropriately, you can contact us in any of the following ways:

By mail: The Privacy Officer,  
Golden Age Placements Pty Ltd,  
PO Box 63, Canterbury, Victoria 3126

By email: [martina@goldenageplacements.com.au](mailto:martina@goldenageplacements.com.au)

If you are not satisfied with the way in which we handle your enquiry, you can call the Office of the Australian Information Commissioner (OAIC) on 1300 363 992, or visit their website at [www.oaic.gov.au](http://www.oaic.gov.au).

## 13. WHAT YOU CONSENT AND AGREE TO

When you provide us with your personal information you consent and agree to our use and disclosure of your personal information in accordance with this policy including, in particular to:

- our use and disclosure of that information in order to provide the service or goods you have requested and for any other compatible purpose including the management, protection and development of our business; and
- our use and disclosure of your personal information for direct marketing purposes. If you do not wish us to use or disclose your personal information for direct marketing purposes, you can indicate your preference by contacting us at any time (see clause 12 above).

## 14. TRANSMISSION OF BUSINESS

Should GAP or its assets be acquired, customer information may comprise one of the transferred assets.

## 15. PRIVACY COMPLAINTS

If you wish to complain about our handling of your personal information, please contact our Privacy Officer using the details set out in clause 12 above. We will investigate all complaints and respond to you as soon as practicable. If we find a complaint justified, we will resolve it. If necessary we will change our policies and procedures to maintain our high standards of performance, service and customer care.

## 16. CHANGES TO THIS POLICY

This is our current privacy policy outlining our personal information management practices. We may vary this policy at any time. To obtain an up to date copy of the policy, please contact GAP (see clause 12 above) or view the most recent policy on our website, [www.goldenageplacements.com.au](http://www.goldenageplacements.com.au)

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