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**Subject: PRIVACY STATEMENT POLICY**

**Section: Governance and Management**

**Date of Last Review: May 2021**

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Glenview is committed to ensuring that the information you provide to us remains secure, that you are aware of what information is held by us and that you are able to exercise your rights in accessing and controlling that information. We are required to comply with the *Privacy Act 1988 (Cwth)* which provides for the fair handling of personal information, and sets standards for the collection, access, storage and use of that information.

### **About this Policy**

This Policy outlines how we manage your personal information and describes the type of information we collect, and how and why that information is collected, held, used and disclosed. The purpose of the privacy legislation is to protect the privacy of individuals by regulating the holding, use, disclosure of, and access to, personal information.

This Policy applies to all your dealings with us. By dealing with Glenview, you consent to our use and disclosure of your personal information in the manner described in this Policy. We encourage you to check our website regularly for any updates to this Policy.

*Glenview Staff: The Internet, Email, Computer & Mobile Device Use and Social Medial Policy should also be read in conjunction with this policy.*

### **What type of information do we collect? How do we collect that information?**

The type of information we collect from you depends on the nature of your dealings with us and the reason for collecting it.

The Australian Privacy Principles, outlined in the *Privacy Act 1988*, set out the way in which personal information must be treated. When used in this Policy, the term “personal information” has the meaning given to it in the *Privacy Act*. In general terms, it is information about an identifiable individual and includes facts or an opinion about you that identifies you or by which your identity can be reasonably determined.

Glenview will collect and use personal information when it is reasonable and necessary for the provision of care and delivery of our services, or business activities. This information may include:

- name, address, telephone numbers;
- date of birth;
- photograph;
- employment details, industry expertise, or areas of interest;
- details of your dealings with us; and
- any other information reasonably necessary to provide our services or undertake our business activities.

Personal information also includes “sensitive information” which is information or an opinion about your:

- racial or ethnic origin;
- political opinions or membership of a political association;
- religious beliefs or affiliations, or philosophical beliefs;
- membership of a professional or trade association, or trade union;
- sexual orientation or practices;
- criminal record;
- health or genetic information.

We may ask you for personal information when you become a:

- user of one of our services;
- employee;
- volunteer;
- contractor;
- job applicant;
- person who provides information by answering a questionnaire.

We will collect personal information during the course of our relationship with you only as permitted by law. We will not collect sensitive information about you without your express consent, unless we are required to do so by law.

We will only collect personal information from third parties in the course of providing services to you or them as permitted by law or with your consent. Examples of where we may receive personal information about you from another source are:

- our resident medical practitioners;
- your medical practitioners;
- referees nominated by you in a job application.

In order to provide the services required, Glenview expects that personal information provided to us is complete and accurate. If you elect not to provide some personal information to us, this may affect our ability to provide services to you.

If we receive any personal information which we are not entitled to hold, we will destroy the information or ensure that it is de-identified as soon as practicable.

We do not collect personal information from casual visitors to our website, unless you have voluntarily supplied us with personal information via one of our web forms or via email.

### **Why do we collect personal information?**

Glenview will only collect personal information in connection with carrying out our services or business activities.

In order for us to deliver high quality aged care services (including personal and clinical care), the collection of sensitive information from users and potential users of our services is essential to ensure your needs are properly understood.

Generally, the purpose for which we collect personal information will be apparent from the way in which we collect it, or it will be disclosed at the time of collection. If at any time, the purpose for which we are collecting your personal information is unclear, please raise your concerns with the person you are dealing with or contact us using the contact details below.

### **How we use your information**

Glenview will only use your personal and/or sensitive information in the following ways:

- for the purpose(s) you have provided the information;
- for a purpose you have consented to; or
- for a purpose otherwise permitted by law.

For service users, the personal and/or sensitive information collected by Glenview may be used:

- to plan and provide care and support;
- to provide information to doctors, nurses and other allied health professionals and staff who provide on-going care;
- for referral services;
- for internal administrative purposes;
- for service delivery and planning;
- for monitoring quality and safety; and
- to provide information to the Department of Health and Ageing and other agencies such as Medicare in accordance with legal obligations.

For staff and volunteers, the personal and/or sensitive information collected by Glenview may be used:

- to assess and (if successful) engage staff and volunteers;
- in administering contracts of employment;
- for insurance purposes;

- to satisfy Glenview's legal obligations.

If you apply for a job with us, we will hold, use and disclose that information solely for the purpose of considering your application.

*Personal and sensitive* information is not disclosed to third parties without your express consent or unless required by law. If you apply for a job with us, we may collect personal information about you from any third parties that you nominate as your referees in your application. Within Glenview, your information is accessed on a 'need to know' basis by relevant Glenview staff.

We may use the information for internal reviews and analysis and may also use it to produce certain consolidated statistics about our services. All such information will be unidentifiable and we will not disclose your identifying personal information nor sell, trade or rent that information to anyone for any purpose. We will always provide individuals the opportunity to refuse to provide this de-identified information for these purposes.

If we no longer need your personal information and we are not required by law to retain it, we will take reasonable steps in the circumstances to destroy or de-identify the information.

Glenview will not disclose your personal information with interstate or overseas individuals or entities, unless your consent is obtained or we are required to do so by law. An example of where we may do this is if a referee on your job application lives interstate or overseas.

We do not use or disclose your personal information for direct marketing purposes.

### **Protection of Personal Information**

We take reasonable steps to ensure that personal information we hold is secure and protected from misuse, interference, loss, unauthorised access, modification or disclosure.

We store your personal information in a variety of ways, which includes secure computer systems and programs, paper personnel files in secure storage, and secure online portals and servers.

We protect your personal information while in storage in a number of ways, including computer and network security, access control for authorised users only (such as security levels and user passwords), secure storage and archiving of files and alarm systems to detect unauthorised access to Glenview.

Glenview has a Data Breach Response Plan that sets out Glenview's obligations, steps, roles and responsibilities for managing a response to a data breach.

## Online Privacy

This section describes how your personal information is collected, used, and shared when you visit [glenview.org.au](http://glenview.org.au) (the “Site”).

### Personal Information We Collect

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as “Device Information.”

We collect Device Information using the following technologies:

- “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “Web beacons,” “tags,” and “pixels” are electronic files used to record information about how you browse the Site.

We do not use the technologies above to identify an individual, when we talk about “Personal Information” in this Privacy Policy, we are talking about Device Information.

### How do we use your personal information?

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

### Advertising

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative’s (“NAI”) educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising:

- FACEBOOK - <https://www.facebook.com/settings/?tab=ads>
- GOOGLE - <https://www.google.com/settings/ads/anonymous>

## **Access to, and accuracy of, your personal information**

Unless prevented by law, you have the right to:

- request access to and/or examine your personal and/or sensitive information;
- request a copy of your personal information;
- request an amendment to your record should it contain inaccurate information;
- request us to remove any of your personal information, which you do not wish us to retain.

The above requests can be made by contacting the Chief Executive Officer, on 03 6277 8800. In keeping with our commitment to protect the privacy of personal information, any request we receive for access to your personal information will require proof of your identity.

You will need to allow up to 30 days for Glenview to arrange access. A Glenview staff member will be present, where appropriate, when you are viewing your information. You will require a staff member to assist you in most cases as most Glenview information is computerised and access to our computer systems is tightly managed.

We will not refuse you access unless there are legal reasons for doing so. In such circumstances, we will explain those reasons to you. The types of situations where we may deny you access to personal information include, but are not limited to, the following:

- we may not hold any personal information about you;
- you have asked for personal information about someone else and are not authorised to do so;
- we no longer have the personal information you are asking for, as it has been destroyed or de-identified;
- the request is frivolous or vexatious;
- the disclosure may prejudice the prevention, investigation and detection of offences or relate to existing or potential legal proceedings, or would prejudice negotiations between us and you; or
- the disclosure would have an unreasonable impact or involve the unwarranted disclosure of the affairs of another individual.

We rely on the accuracy of the personal information we hold about you to efficiently provide our services to you. We will take reasonable steps to ensure that personal information about you is accurate, up-to-date and complete.

If you find any inaccuracies in the information, please let the CEO know as soon as possible. Similarly, if you feel that the privacy of your personal information has been interfered with, or you are dissatisfied with the use of your personal information, you are encouraged to raise the issue with the CEO, or staff member present with you at the time of inspection. Alternatively, you may make a complaint as outlined below.

## **Complaints relating to information collected or held**

Anyone who has a complaint in relation to the information collected by Glenview, the way information is stored by Glenview, or the way information is used by Glenview has the right to the following complaint process.

In the first instance, a complaint should be made to the Chief Executive Officer, who can be contacted on the following contact details:

Telephone: 03 6277 8800

Mail: Attention: Chief Executive Officer  
2 – 10 Windsor Street  
GLENORCHY TAS 7010

The CEO will investigate the complaint and determine the appropriate course of action, if necessary. The CEO will provide a written explanation of the decision they make to the complainant and any other relevant parties.

If at this stage the matter has still not been resolved to your satisfaction, you can refer your complaint to the Office of the Australian Information Commissioner. This office ensures the proper handling of personal information in accordance with the Privacy Act and other legislation. You may contact the Office by:

Telephone: 1300 363 992; or  
if calling from outside Australia, +61 2 9284 9749

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Fax: +61 2 9284 9666

Mail: GPO Box 5218  
SYDNEY NSW 2001.

You can obtain further information on privacy issues, and view the National Privacy Principles, by visiting the Australian Information Commissioner's website: <http://www.oaic.gov.au>.

This Privacy Policy will be reviewed and updated by us from time to time. Updated versions of this Policy will be published by us on our website and made available upon request.

Our website may contain links or plug-ins to other sites. We are not responsible for the content of or the privacy practices or policies of, those sites.