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## 1. Policy Statement

- 1.1 The Oak Tree Group (**OTG**) recognises the importance of privacy and protection of your personal information.
- 1.2 This Privacy Policy (**Policy**) describes how OTG manages and protects personal information that is in its possession or control.
- 1.3 OTG is comprised of Oak Tree Holdings Pty Ltd and its subsidiary companies.

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## 2. Purpose

- 2.1 Specifically, this Policy sets out:
  - (a) the kinds of personal information OTG collects and holds;
  - (b) how personal information is collected and held by OTG;
  - (c) the purposes for which OTG collects, holds, uses and discloses personal information;
  - (d) how you may access or correct any of your personal information held by OTG; and
  - (e) contact information should you have any enquiry or complaint about how your personal information is handled by any member of OTG.
- 2.2 Please read this Policy as we hope that this will help you make an informed decision about sharing your personal information with us. As well as applying to our interactions with you, this Policy also applies to all information collected through our websites, browser extensions, and any other platforms and/or mobile apps that we operate.
- 2.3 This Policy sits alongside our terms and conditions that apply to any products and services that we provide to you.

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## 3. Scope

- 3.1 This Policy applies to all personal information collected or held by any member of OTG, including from our individual residents, guests, subscribers to any of our services, purchasers of our services and/or products, job applicants, individual contractors, suppliers and/or individual contacts at any business with which we interact and any individual who interacts with us.
- 3.2 In this Policy, '**us**' '**we**' or '**our**' means collectively or any individual member of OTG (as the case may be). In handling your personal information, we are bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) including the Australian Privacy Principles (**APPs**), the *SPAM Act, 2003 (inc. SPAM Regulations, 2023)* (Cth), the *Do Not Call Register Act, 2006* (Cth), applicable Federal, State and Territory-based privacy legislation regulating the processing of health information, applicable State and Territory-based surveillance laws, and all other applicable privacy laws (collectively, **Privacy Laws**).
- 3.3 By providing personal information to us, you agree that our collection, use, storage and disclosure of your personal information will be completed in accordance with this Policy and any other written arrangements in place between us.

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## 4. What is Personal Information?

- 4.1 In this Policy, '**personal information**' has the meaning set out in the Privacy Act. In general terms, personal information is information (whether fact or opinion) about an individual who is identified or reasonably identifiable from that information or other information combined with that information.

- 4.2 Some types of personal information are classified as 'sensitive information' and/or 'health information', which are subject to additional – and higher - protection under applicable Privacy Laws. Sensitive information may include information about your racial origin, sexual orientation, biometric information or information about your health status, and health information may also include information about a health-related service that you have had or will receive, including any test results or medical appointment details.
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## 5. What Types of Personal Information Do We Collect?

- 5.1 The types of personal information that OTG collects about you depends on the nature of your interactions with us.
- 5.2 We will only collect and hold personal information about you that is reasonably necessary for our business functions and activities and the provision of services and advice relating to you, or where we are otherwise authorised to do so, including where the collection and/or storage is required or authorised by or under an Australian law or a court/tribunal order.
- 5.3 Our functions and activities include, but are not limited to:
- (a) designing, building and constructing retirement villages units;
  - (b) operating and managing retirement villages units;
  - (c) providing various products and services and facilities to residents of retirement villages units (and their guests); and
  - (d) supporting and assisting with the sale of properties and independent living units, villas or apartments by residents or others located in an OTG retirement village.
- 5.4 We may collect the following types of personal information:
- (a) your contact information to communicate with you or verify your identity, including your name, date of birth, gender, address, email address and telephone number;
  - (b) formal identification documents (e.g. including drivers' licence, passport) to verify a resident's identity;
  - (c) financial information including your bank account details and credit card details;
  - (d) where you are an applicant to us for a role, details of your relevant employment history and other information provided or requested as part of our recruitment process, including but not limited to details of your criminal history, bankruptcy status, citizenship, residency, and/or visa status;
  - (e) your preferences in respect of our products, services, facilities and related lifestyle activities;
  - (f) certain profile information about you and your family/guests and your and their characteristics, including preferences or requirements that are relevant to the products and services that we may provide to you;
  - (g) your facial images and/or voice and other personal information (such as your car licence plate) collected via CCTV surveillance systems which are installed in our shared retirement living community areas, including in/near our offices;
  - (h) technical information, including your device ID, device type, geo-location information, IP address, browsing information and any personal information that you may provide to us directly or indirectly where you access or use our websites, Wi-Fi services, mobile applications and the like; and
  - (i) any other personal information that may be requested, required or collected in order to facilitate your interactions and dealings with us as an individual.
- 5.5 If you provide us with personal information about a third party (e.g. another resident you live with, are related to,

etc.), you confirm, and we collect it on the basis that, you have that person's express consent and authorisation for us to collect and handle their personal information in the manner in which you have provided it to us – and you confirm that you have made, or will make, that other third party aware that we collect and handle this information in accordance with this Policy.

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## 6. Do We Collect Sensitive Information?

6.1 Yes. But we will only collect sensitive information if:

- (a) we need it to provide you with the products or services you have requested or for one of our functions or activities and we have your consent to do so; or
- (b) we are otherwise legally required or allowed to collect and handle this information.

6.2 This 'sensitive information' may include:

- (a) your health and medical information (e.g. if as a resident you have specific medical or health conditions that we should be aware in order to provide retirement village services to you; or you are involved in an accident in one of our villages, we may collect medical information and incident reports; or if you are role applicant with us, we may collect any health information provide as part of that role disclosure requirement);
- (b) information about your religion, ethnicity, sexual preferences or political opinions;
- (c) biometric information (e.g. facial or iris recognition technologies); or
- (d) criminal records checks (e.g. as background checks for prospective employees / role applicants).

6.3 CCTV footage may also contain sensitive information (which we collect), for example biometric or facial images.

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## 7. How Do We Collect Personal Information, including Sensitive Information?

7.1 We will generally collect personal information:

- (a) from you directly, when you provide it to us and/or communicate or engage with us;
- (b) from you indirectly, anytime you communicate or interact with us, whether this is by phone, email, face to face meeting, online or social media interaction;
- (c) when you use our websites, applications, Wi-Fi or our other online services;
- (d) when you participation in our surveys, competitions or promotions;
- (e) when you visit our retirement living communities or workplace, through CCTV remote monitoring systems, and particulars related to your interest in living in our communities; and
- (f) as part of our recruitment process when you apply for a position with us, including where we obtain from third parties.

7.2 We may also consider it necessary to carry out CCTV surveillance in our retirement villages to enhance safety, particularly the safety of residents and workers. CCTV surveillance will be clearly signed where it is carried out and residents, their representatives and OTG workers will be notified of the installation of surveillance cameras prior to their installation. These surveillance systems may collect personal information.

7.3 We may also collect your personal information from third parties such as:

- (a) your family members or carers;

- (b) your authorised representative (for example, a legal representative, an appointed attorney, public trustee or guardian);
- (c) marketing agencies, data collection and research organisations;
- (d) medical or health professionals (e.g. your doctor, or if you are involved in an accident);
- (e) other healthcare or service providers on an as-needed basis to provide our products and services to you;
- (f) law enforcement and government entities; and
- (g) other individuals (e.g., where required as part of our recruitment process, e.g. employment references).

7.4 We also use technologies to collect technical information and general analytics (such as cookies on our website). You may disable your web browser from accepting cookies and other tracking technologies used to collect technical information and general analytics when browsing our website. If you do so, you can still access our website, but it may impact your user experience.

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## 8. What happens if We Cannot Collect Your Personal Information?

8.1 You are not required to provide personal information to us. However, if you wish to deal with us anonymously, while using a pseudonym, or you decide not to provide us with the personal information described above (which can do in any case), we may not be able to provide or tailor our products, services or information to you, either to the same standard or at all (e.g. as noted, certain functions of our website may not function properly if you disable cookies).

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## 9. Why Do We Collect, Store, Use and Disclose Personal Information?

9.1 We may collect, store, use and disclose your personal information to carry our business functions or activities or to provide you with a product or service, including for the following purposes:

- (a) to conduct identity verification;
- (b) to communicate with you and to address any issues or complaints that we or you may have regarding our relationship, and our products and/or services;
- (c) to provide you with our products and/or services;
- (d) to do business with you;
- (e) for the general management and conduct of our business;
- (f) to comply with our legal obligations such as notifying you of matters that we may be required by law to do so;
- (g) to investigate complaints, incidents (including potential incidents) or suspicion of misconduct/breach which occur on or at our premises;
- (h) prevent, detect and investigate suspicious, fraudulent, criminal or other activity that may cause you, us or others harm, including in relation to our products and services;
- (i) identify opportunities to improve our products and services and to improve our service to you;
- (j) gain insights about you so that we can serve you better, understand your preferences and interests, personalise your experience and/or enhance products and services you are offered and receive;
- (k) assess applications by prospective employees and conducting pre and ongoing employment background

- checks;
- (l) to directly market our products and services to you; including through social media and other digital platforms (see further the "Direct Marketing Communications" section below);
  - (m) for security and risk management purposes;
  - (n) to help us manage and develop our products and services, including our websites, Wi-Fi networks and applications; and
  - (o) contact you regarding any of the above, including via electronic messaging such as SMS, email, by post, by phone or in any other lawful manner.

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## 10. To Whom Do We Disclose Personal Information?

10.1 We may disclose your personal information to third parties for a number of reasons, including for our legitimate business purposes, if and where you have consented to such disclosure, or if we are permitted or required to do so by law, and we will do so in each case in accordance with applicable law and subject to applicable regulatory requirements. This includes, but is not limited to:

- (a) our related bodies corporate and each member of OTG;
- (b) our employees and contractors who assist us in performing our functions and activities, and in providing our products and services to you;
- (c) our professional advisors (including legal advisers, accountants, insurers and auditors);
- (d) any potential third-party acquirer of our business or assets, and advisors to that third party;
- (e) as applicable, your current or former employers;
- (f) legal or regulatory authorities, where permitted or required to do so by law;
- (g) our technical or commercial service providers (e.g., providers of data hosting or warehousing services; document review services; financial institutions etc.);
- (h) credit reporting bodies (if and where we are assessing your credit worthiness) where permitted to do so;
- (i) any party you have authorised to act on your behalf (such as your power of attorney, trustee or financial adviser);
- (j) relevant Federal and/or State Government agencies (such as Centrelink, Workcover, ATO);
- (k) other organisations or super funds (such as super funds where you are transferring into or out of our super fund); and
- (l) any relevant third-party marketing or advertising provider, e.g., where our website and our app use third party advertising, plugins or content (including cookies).

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## 11. Does Personal Information Leave Australia?

11.1 in certain cases, we may disclose your personal information to the following overseas recipients:

- (a) any member of OTG;
- (b) other companies, service providers and individuals who assist us in providing services or perform functions on our behalf, including our hosting and data storage providers; and

(c) where we are required or authorised by law to do so.

11.2 It is not practical for us to list every country where such overseas recipients may be located, however such countries are likely to include the United Kingdom, New Zealand and Malaysia. If your personal information is sent to a recipient in a country with data protection laws which are at least substantially similar to the Privacy Act and the Australian Privacy Principles, and where there are mechanisms available to you to enforce protection of your personal information under that overseas law, we will not be liable for a breach of the Privacy Act and the Australian Privacy Principles if your personal information is mishandled in that jurisdiction. If your personal information is transferred to a jurisdiction which does not have data protection laws as comprehensive as Australia's, we will take commercially reasonable steps to secure a contractual commitment from the recipient to handle your information in accordance with the Privacy Act and the Australian Privacy Principles.

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## 12. Direct Marketing Communications

12.1 We will only send you direct marketing communications (either through mail, SMS or email), including any news and exclusive offers, promotions, or events, where you have consented for us to do so.

12.2 We and/or our third-party service providers may send you direct marketing communications and information about:

- (a) products, services, discounts, competitions and special promotions that we consider may be of interest to you;
- (b) offers or promotions based on how you use our products and services; and
- (c) third party products and services (including offers and discounts we may have negotiated for our residents) that we think may interest you.

12.3 We may de-identify your information before disclosing it to third parties to facilitate our marketing activities.

12.4 These communications may be sent in various forms, including by telephone, post, fax, email, SMS or any other form of electronic communication as permitted under applicable Privacy Laws.

12.5 You may opt-out of any, or all, direct marketing communications at any time by contacting us or by clicking on the 'opt-out' or 'unsubscribe' function set out by us using the details set out in the relevant marketing communication.

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## 13. Storage of Personal Information

13.1 All personal information collected by OTG will be securely stored in our company electronic databases. In some instances, personal information may be stored in hard copy (paper) form in secured and locked facilities at our headquarters in Brisbane, Australia and throughout our different offices and villages in Australia.

13.2 The confidentiality and security of your information is very important to us, and we will take reasonable steps in accordance with applicable laws to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. However, particularly for electronic data stores and due to the fact that the Internet is inherently insecure, we cannot guarantee the security of transmission of personal information disclosed to us online. Accordingly, you transmit your personal information to us online at your own risk and are encouraged to exercise care in sending personal information via the internet.

13.3 Please notify us immediately if you know or reasonably suspect that your personal information has been subject to any data breach, breach of security or other unauthorised activity of any kind.

13.4 We use a number of physical, administrative, personnel and technical measures to protect your personal information, and we undertake to regularly test our applicable security controls.



- 13.5 Where we no longer require your personal information for business or legal reasons, we will take reasonable steps to destroy or de-identify it to the extent required by applicable laws.
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## 14. Access and Correction of Personal Information

- 14.1 Under the Privacy Act, you may seek access to or correction of the personal information that we hold about you. These rights are subject to certain exemptions. You can ask for access or correction by contacting our Privacy Officer on the details contained in this Policy or, alternatively if easier for you and you are a resident of any of our retirement villages, you can contact the Village Manager of your relevant village.
- 14.2 You may be asked to submit your request in writing. We must give you access to, and take reasonable steps to correct, your personal information if it is incorrect, unless an exception in the Privacy Act (including the APPs) or other applicable law applies. We will require you to verify your identity (and provide us with evidence of your authority, if applicable) before we provide access or correct your personal information. We will advise you in writing if a correction request is refused and reasons why, where permitted to do so under applicable laws.
- 14.3 There may be instances where we cannot grant you access to the personal information we hold, for example, if a legal exception applies or where granting access would interfere with the privacy of others or result in a breach of confidentiality. If that happens, we will, where permitted by law, let you know.
- 14.4 We will not generally charge you for requesting access or corrections to your personal information; however there maybe cases where we must seek to charge a nominal fee in respect of our reasonable expenses to cover search and disclosure fees (where permitted by applicable Privacy Laws). We will advise you in advance in writing if any such fees are applicable.
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## 15. Complaints and Concerns

- 15.1 If you have any questions about how we handle your personal information, or if you wish to make a complaint about our information handling practices, please contact our Privacy Officer:
- (a) Email: [privacy@oaktreegroup.com.au](mailto:privacy@oaktreegroup.com.au)
  - (b) Phone: 1300 367 155
  - (c) Post: Privacy Office - Level 9, 299 Adelaide Street, Brisbane QLD 4000
- 15.2 Our Privacy Officer will acknowledge receipt of your complaint and after we have completed our investigation, contact you (usually in writing) to advise the outcome and invite a response to our findings.
- 15.3 If you consider that we have been unable to satisfactorily resolve your concerns about our handling of your personal information, or if you are otherwise unhappy with our response, you can contact the OAIC at any time on:
- (a) Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
  - (b) Phone: 1300 363 992
  - (c) Post: Office of the Australian Information Commissioner
  - (d) GPO Box 5218 Sydney NSW 2000
- Please visit the OAIC website at [www.oaic.gov.au](http://www.oaic.gov.au) for further information
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## 16. Third Party Links

- 16.1 Our websites and mobile applications may contain links to websites owned and operated by other third-party
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# Privacy Policy



organisations. When you click on one of these links, you are moving to another third-party website, browser or related online tool. Unless stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, browsers or related online tools. We encourage you to read the privacy policies and other terms that apply to these third parties as they may differ from this Policy, and if you have any privacy concerns, we encourage you to contact those third party providers directly for a copy of their relevant privacy policy and any applicable terms that apply to their website, browsers or online tools, including any of their products or services.

## 17. Changes to Current Policy

**17.1** We may update this Policy from time to time to take into account new laws and technology, changes to our operations and business practices. The most current version of this Policy is on our website at: [www.oaktreegroup.com.au/privacy-policy](http://www.oaktreegroup.com.au/privacy-policy) and we encourage you to check this periodically to ensure that you have the most up to date version of our Policy. We will endeavour to notify you by email or other usual communication manner in the event of any material change to this Policy.

## 18. Legislation or other requirements

- 18.1 *Privacy Act 1988 (Cth) and APPs*
- 18.2 *Spam Act 2003 (Cth) (incorporating Spam Regulations, 2023)*
- 18.3 *Do Not Call Register Act 2006 (Cth)*
- 18.4 *Privacy Complaints and Incident Management Procedure*

## 19. Contact Information

19.1 If you have any questions regarding this Policy, please speak to your Executive and/or seek advice from the Legal and Human Resources Services team.

## 20. Authorising Party

The Board.

## 21. Revisions History

Version	Reason	Date Approved	Approving Body
Version 2	Initial Document and Register	11 February 2025	Board



# Privacy Policy

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<b>Document Title:</b>	Privacy Policy
<b>Summary:</b>	This Policy outlines how OTG manages the collection, use, storage and disclosure of personal information in its possession or control.
<b>Date of Issue:</b>	December 2019
<b>Date of Review:</b>	February 2025
<b>Author:</b>	OTG
<b>Executive Approval:</b>	Chief Executive Officer
<b>Final Approval:</b>	Board of Directors
<b>Version Control:</b>	Version 2
<b>Version Updates/Review:</b>	Revision 1