

# PRIVACY POLICY

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<b>Document Title:</b>	Privacy Policy
<b>Summary:</b>	This policy outlines the key points in which Oak Tree Group manages the collection, use and disclosure of personal information.
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<b>Author:</b>	Oak Tree Group



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<b>Executive Approval:</b>	Head of Legal
<b>Final Approval:</b>	Oak Tree Group Director
<b>Version Control:</b>	Version 1
<b>Version Updates/Review:</b>	Revision 1

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## 1. Policy Statement

- 1.1 This Privacy Policy describes how Oak Tree Holdings Pty Ltd ACN 161 180 230 and its related entities (collectively **Oak Tree Group**) manages the collection, use and disclosure of personal information in an open and transparent way and protects the privacy of individuals regarding the personal information held.
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## 2. Objective

- 2.1 The objective of this procedure is to articulate Oak Tree Group's compliance and commitment to ensuring that all personal information is only collected, disclosed, used and stored in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.
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## 3. Scope

- 3.1 In this Privacy Policy, 'us' 'we' or 'our' means Oak Tree Group. We are bound by the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Privacy Act). This Privacy Policy has been drafted to comply with the APPs.
- 3.2 Oak Tree Group is committed to protecting the personal information it collects in accordance with the requirements of the APPs.
- 3.3 By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us.
- 3.4 This Privacy Policy applies to our guests, visitors to [www.oaktreegroup.com.au](http://www.oaktreegroup.com.au) (website), subscribers to any of our services, purchasers of our services and products and any individual who interacts with us.
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## 4. Responsibilities

- 4.1 This policy allocates responsibilities for:
- (a) Oak Tree Group;
  - (b) Oak Tree Group employees.
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## 5. Collection of Personal Information

- 5.1 Oak Tree Group will only collect and hold personal information about an individual that is reasonably necessary for our business functions, activities and the provision of services and advice related to that individual, or where the collection and storage is required or authorised by or under an Australian law or a court/tribunal order.
- 5.2 Our functions and activities include, but are not limited to:
- (a) building retirement villages;
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- (b) operating and managing retirement villages;
- (c) providing services and facilities to residents of retirement villages; and
- (d) assisting with the sale of properties located in an Oak Tree Group retirement village.

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## 6. What Personal Information is Collected?

- 6.1 The types of personal information Oak Tree Group collects about you depends on the nature of your interactions with us. In this Policy, “personal information” has the meaning given to it in the Privacy Act and includes any information or opinion, whether true or not, about an identified individual or an individual who is reasonably identifiable.
- 6.2 We may collect the following types of personal information:
- (a) information to verify your identity including your name, date of birth, gender, address, email address and telephone number;
  - (b) financial information including bank accounts, credit card details, your income and credit-worthiness;
  - (c) details of your employment history, and other information provided as part of our recruitment process;
  - (d) your preference of our products, services, facilities and lifestyle activities;
  - (e) information about you and your family and any characteristics, preferences or requirements that are relevant to the products and services that we may provide to you;
  - (f) your image and/or voice and other personal information (such as your car licence plate) collected via CCTV surveillance systems installed in our retirement living communities;
  - (g) 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 via our websites, Wi-Fi services, mobile applications; and
  - (h) any other personal information that may be required in order to facilitate your dealings with us.

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## 7. Do we Collect Sensitive Information?

- 7.1 In some cases, we may also collect ‘sensitive information’, for example if you are involved in an accident, we may collect medical information and incident reports.
- 7.2 CCTV footage may contain sensitive information, this is covered in more detail in the section dealing with access to personal information.

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## 8. How is Personal Information Collected?

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- 8.1 Oak Tree Group will generally collect personal information:
- (a) from you directly, when you communicate 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 or our Wi-Fi services;
  - (d) your participation in our surveys, competitions or promotions;
  - (e) when you visit our retirement living communities or workplace through our CCTV systems; and
  - (f) through our recruitment process when you apply for a position with us.
- 8.2 Oak Tree Group may also collect your personal information from third parties such as:
- (a) marketing agencies, data collection and research organisations;
  - (b) medical professionals (for example if you are involved in an accident);
  - (c) credit reporting bodies, law enforcement and government entities; and
  - (d) other individuals (for example employment references).

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## 9. What happens if Oak Tree Group cannot collect Personal Information?

- 9.1 You are not required to provide personal information to us. If you wish to deal with us anonymously or you decide not to provide us with the personal information described above, we may not be able to provide or tailor our products, services or information to you, either to the same standard or at all (for example certain functions of our website may not function properly if you disable cookies).

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## 10. Why do Oak Tree Group collect, store, use and Disclose Personal Information?

- 10.1 Oak Tree may collect, hold, use and disclose your personal information for the following purposes:
- (a) to provide and market our products and services;
  - (b) to communicate with you;
  - (c) to do business with you;
  - (d) for the general management and conduct of our business;
  - (e) to comply with our legal obligations;
  - (f) to investigate incidents (including potential incidents) which occur on or at our premises;

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- (g) to consider the suitability of prospective employees;
- (h) for security and risk management purposes; and
- (i) to help us manage, develop and enhance our services, including our websites, Wi-Fi networks and applications.

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## 11. Use and disclosure of Personal Information

- 11.1 Generally Oak Tree Group will only use or disclose personal information for the purpose for which it was collected (the primary purpose), including the purposes set out above.
- 11.2 However, Oak Tree Group may use or disclose personal information for secondary purposes if we receive your consent to do so, or without your consent if you would reasonably expect us to use your information for the secondary purpose, or otherwise when the APPs permit us to do so.
- 11.3 For example, the APPs permit us to use and disclose personal information for a secondary purpose without an individual's consent if the individual would reasonably expect us to use or disclose the information for a certain secondary purpose and the secondary purpose is:
  - (a) if the information is sensitive – directly related to the primary purpose; or
  - (b) if the information is not sensitive – related to the primary purpose; or
  - (c) the use or disclosure of the information is permitted or authorised by or under an Australian law or a court/tribunal order (for example where disclosure of your information will reduce or prevent a serious threat to life, health or safety or where our disclosure is in response to any unlawful activity).

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## 12. CCTV at Oak Tree sites and Retirement Villages

- 12.1 Oak Tree Group may use CCTV surveillance systems to monitor and record activities at Oak Tree premises (including our workplace and retirement living communities), the main purpose of this is to maintain a safe and secure environment for our employees, residents and visitors to our premises.
- 12.2 This means we may use your personal information gathered from CCTV for security and risk management, loss prevention, incident investigation purposes and other purposes set out in this Policy, or as permitted by the law.
- 12.3 We securely discard the data collected from our CCTV surveillance systems when it is no longer required for business or legal purposes.

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## 13. Free Wi Fi Service

- 13.1 Oak Tree Group may offer a free Wi-Fi network service at certain Oak Tree facilities, including our retirement villages.

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- 13.2 If you are carrying a Wi-Fi enabled device within range of one of our Wi-Fi networks, we may pick up certain data that is transmitted from your device if you join our Wi-Fi network, including:
- (a) your device ID, device type, IP address and MAC address;
  - (b) geo-location information and any movement of your device throughout our premises; and
  - (c) any other information which you may voluntarily provide to us while accessing our Wi-Fi networks, for example, your name, email address, the details of the websites or mobile applications whilst you are connected to our network.
- 13.3 We may also link this type of information to your provided personal information if we hold a common identifier such as your unique device identifier.
- 13.4 In each case, we will only use information or data collected via our free Wi-Fi network service in accordance with, and for the purposes set out in this Policy, or as permitted by the law.
- 13.5 If you do not want this information collected, you can disable Wi-Fi and Bluetooth on your device/should not sign into the Wi-Fi network.

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### **14. Direct Marketing Communications**

- 14.1 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 customers) we think may interest you.
- 14.2 These communications may be sent in various forms, including by telephone, post, fax, email, SMS or any other form of electronic communication, in accordance with the Privacy Act and the Spam Act 2003 (Cth). By providing us your contact details you consent to Oak Tree Group and/or third-party service providers we engage, sending you the direct marketing messages described above.

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### **15. Opting-out of other or all Marketing Communications**

- 15.1 You may opt-out of any or all, direct marketing communications at any time by contacting the sender using the details set out in the communication (for example an unsubscribe link), or in the case of Oak Tree Group, by contacting Customer Relations on 1300 367 155. In some situations, for example if we are providing services to you, we may still be required to make certain communications to you in connection with providing the services or products to you or as required by law.

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### **16. Do we disclose information outside of Australia?**

- 16.1 We may disclose your personal information to the following overseas recipients:
- (a) to related entities;
  - (b) to other companies, service providers and individuals who assist us in providing services or perform functions on our behalf such as hosting and data storage providers; and
  - (c) where we are required or authorised by law to do so.
- 16.2 We will take reasonable steps to ensure that any overseas recipient does not use the personal information for their own purpose and complies with the Privacy Act and this Policy.
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### **17. Cookies**

- 17.1 Cookies are pieces of information that a website transfers to your device to store and sometimes track information about your use of the website. We use cookies to distinguish you from other users in order to better serve you when you revisit our website.
- 17.2 You can set your browser to notify you when you receive cookies, providing you with the opportunity to either accept or reject it, you can also refuse all cookies by turning them off in your browser. However, if you do this, certain parts of our website may not function properly.
- 17.3 We handle personal information collected by cookies in the same way that we handle all other personal information as described in this Policy.
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### **18. Security of Information**

- 18.1 Oak Tree Group may hold your personal information in either electronic or hard copy form. The confidentiality and security of your information is very important to us, and we take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.
- 18.2 We use a number of physical, administrative, personnel and technical measures to protect your personal information, and regularly test our security controls, however the open nature of the internet means there is always some risk that an unauthorised party might find ways to overcome our security measures, and it is not possible to guarantee the security of your personal information. You should also be aware that e-mail communications are not usually encrypted and should not be considered secure.
- 18.3 Where we no longer require your personal information for business or legal reasons, we will take reasonable steps to destroy or de-identify it.
- 18.4 Where required by applicable law, we will notify you, and the Office of the Australian Information Commissioner and/or other relevant regulatory authorities, of data breaches affecting your personal information.
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### **19. Third party links**



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- 19.1 Our websites and mobile applications may contain links to websites owned and operated by other organisations. When you click on one of these links, you are moving to another website. Unless stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites. We encourage you to read the privacy policies and other terms that apply to those websites as they may differ from this Policy, and if you have any privacy concerns, we encourage you to contact those website providers directly.

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### 20. Access and correction of Personal Information

- 20.1 If you wish to seek access to and correction of your personal information that we hold about you, please contact our Customer Relations Officer on 1300 367 155. Depending on the nature of your request, we may ask you to provide us further information in order to verify your identity and ask you to put in writing the information you require.
- 20.2 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 give you written reasons for refusal.
- 20.3 In the case of requesting access to CCTV footage, we have a corporate procedure, developed to conform with the Privacy Act that governs our use and release of CCTV footage. It may also be the case that we are unable to release CCTV footage if there is an investigation or legal action pending.
- 20.4 If you wish to update the personal information that we may hold, please contact our Customer Relations Officer [customerrelations@oaktreegroup.com.au](mailto:customerrelations@oaktreegroup.com.au). If we disagree that there are grounds for amending your personal information, we will inform you of the reasons and add a note to the personal information stating that you disagree with it.
- 20.5 We will not charge you for requesting access or corrections to your personal information, however we may recover reasonable expenses associated with providing you with access to your personal information.

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### 21. Complaints and concerns about your Privacy

- 21.1 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) Post: Privacy Officer
  - (c) Oak Tree Group, PO Box 947, Spring Hill QLD, 4004
- 21.2 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, usually within 30 days, and invite a response to our findings.

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- 21.3 If you consider that we have been unable to satisfactorily resolve your concerns about our handling of your personal information, you can contact the Office of the Australian Information Commissioner:
- (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
  - (e) Please visit the OAIC website at [www.oaic.gov.au](http://www.oaic.gov.au) for further information
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## 22. Changes to Current Policy

- 22.1 We may update our 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 periodically to ensure that you have the most up to date version of our current Policy.

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## Schedule 1– References & Links:

- Privacy Act 1988 (Cth)
- Spam Act 2003 (Cth)
- Retirement Villages Act 1999 (QLD)
- Retirement Villages Regulation 2018 (QLD)
- Retirement Villages Act 1999 (NSW)
- Retirement Villages Regulation 2017 (NSW)
- Retirement Villages Act 1986 (VIC)
- Retirement Villages (Contractual Arrangements) Regulations 2017 (VIC)
- Retirement Villages Act 2004 (TAS)
- Retirement Villages Regulations 2015 (TAS)
- Retirement Living Code of Conduct