Privacy Policy - Customers

Sponsor: Sundale Board

Purpose and Scope

Sundale Ltd and its related bodies corporate (**Sundale**, **we**, **us**, **our**) recognise that your privacy is very important, and we are committed to protecting the personal information we collect from you. The Privacy Act 1988 (Cth), the Privacy and Other Legislation Amendment Act 2024 (Cth), the Australian Privacy Principles (APPs), the Aged Care Act 2024 (Cth), and other applicable privacy, health records, aged care and records management legislation govern the way in which we manage personal information. This Policy explains how Sundale collects, holds, uses, discloses, stores and otherwise manages personal information. This Policy applies to customers, residents, care recipients, representatives and other individuals whose personal information is collected, used, disclosed or otherwise handled by Sundale in connection with the provision of services.

Types of information collected

Sundale may collect, hold and use personal information about you that is reasonably necessary to provide services, comply with legal obligations, manage service delivery arrangements and operate our business activities.

The kinds of information we collect from you depend on our relationship with you. Generally, however, we may collect your name, contact details, and other information relevant to providing you with the services you are, or someone else you know is seeking. If you are someone to whom we provide care through our Aged Care, Support at Home, Retirement Living and Senior's Rentals services (**Customer**) we will also generally collect your date of birth, gender, personal and emergency contact information, financial information including banking details and health and medical information (including Medicare numbers, to allow us to book health services on your behalf). Additionally, we may collect, use and hold photographs, video recordings and other

visual images in accordance with applicable agreements, consent arrangements, legal requirements and the Aged Care Standards.

In addition to health information, we are likely to collect and hold other sensitive information about you in providing you with aged care services, including your racial or ethnic background, sexual orientation or practices, and religious beliefs.

We may also collect information through the use of our website and digital platforms, including user preferences, 'cookie' information, and geographical location. This may include online enquiries, website interactions, online forms, portal access records, device information, usage analytics and related digital communications.

Complaints and Incident Information

We may also collect information relating to quality, safeguarding, service delivery, care planning, risk management, investigations, feedback and complaints management activities.

Method of collection

Sundale will generally collect personal information directly from you through a variety of avenues, including any of our standard forms, via emails or other communications, via phone, in person, and via our website and social media accounts.

There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. For example, we may collect personal information about aged care or in-home care recipients from authorised representative and family members, carers, healthcare providers, other aged care providers and service providers (including Queensland Health). Where applicable, we may also collect information from relevant government departments. Sundale will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

Sundale only collects sensitive information if you consent to the collection of the information and if the information is reasonably necessary for the performance of our functions and activities. Consent may be express or implied depending upon the circumstances and where permitted by law.

There may also be circumstances under which we may collect sensitive information without your consent, as required or authorised by law.

We ask our customers and their authorised representatives to identify any parties from whom you do not wish personal information to be collected. We will record this information in your file and will comply with your instructions to the extent permitted by law.

If Sundale receives unsolicited information about you that we did not request and which is not directly related to our functions or activities, we may be required to destroy or de-identify that information, providing it is lawful and reasonable to do so.

Purpose of collection

The personal information we collect and hold about you depends on your interaction with us.

Generally, we will collect, use, and hold your personal information if it is reasonably necessary for, or directly related to, the performance of our functions and activities and for the purposes of:

(a) providing services to you or someone else you know;

(b) facilitating our internal business operations, including:

i. the fulfilment of any legal requirements;

ii. responding to enquiries and requests for services or information;

iii. managing our relationship with you and communicating with you in the ordinary course of that relationship;

iv. analysing our services and customer needs with a view to developing new or improved services or business operations;

v. managing quality, safety, incident, complaints, risk management, governance, assurance activities, compliance and accreditation activities;

vi. preventing, detecting and investigating suspected fraud, misconduct, abuse or other unlawful conduct;

vii. improving and evaluating service delivery and customer outcomes.

(c) except with respect to Customers, providing you with information about other services that we or our related entities and other affiliated organisations offer that may be of interest to you; and

(d) except with respect to Customers, contacting you to provide a testimonial for us.

Technology and Substantially Automated Decision-Making

Sundale may use technology, information systems, data analytics tools and substantially automated processes to support operational, clinical, quality, safety, rostering, service allocation, funding, administration, workforce management and risk management functions.

These processes may use personal information to assist employees in making decisions relating to service planning, workforce allocation, scheduling, quality monitoring, funding administration, incident management, risk assessment and operational activities.

Sundale implements appropriate human oversight of substantially automated processes. Such systems are designed to support, rather than replace, professional judgement and decision-making and are subject to human review before being relied upon for significant operational, clinical or service delivery decisions.

Individuals may request further information about the use of substantially automated processes by contacting Sundale's Privacy Officer.

Failure to provide information

If you choose not to provide requested personal information, or if the information provided is incomplete, inaccurate or out of date, Sundale may be unable to provide some or all services, supports, accommodation, information or assistance requested by you.

Internet users

If you access our website, we may collect additional personal information about you in the form of your IP address and domain name.

Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

Our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view so that we may serve you more effectively.

Closed Circuit Television (CCTV) surveillance

CCTV refers to camera surveillance that captures images of people and activity. Any personal information collected through CCTV surveillance must comply with the Privacy Law.

CCTV operates in some common and/or external areas of certain Sundale premises. The main purpose of this is to maintain a safe and secure environment for our employees, clients, residents and visitors. We may use personal information gathered from CCTV for security, risk management and incident investigation purposes. Access to CCTV footage will only be granted where access is required or authorised by law.

Use and disclosure

Generally, Sundale only uses or discloses personal information for the purposes for which it was collected (as set out above). Sundale may disclose personal information about you to:

(a) our employees, contractors, consultants, and other parties who require the information to assist us with facilitating our internal business processes, providing you with services and information, and with establishing, maintaining, managing, or ending the relationship with you;

(b) our related entities to facilitate ours, and their, internal business processes;

(c) third party service providers who assist us in operating our business (including payment processors, insurers, IT and technology service providers, and professional advisers such as lawyers, accountants, and auditors) and these service providers are required to handle personal information in accordance with contractual obligations, confidentiality requirements and applicable privacy laws;

(d) third parties to whom you have agreed we may disclose your information or where the information was collected from you (or from an authorised discloser) for the purposes of passing it on to the third party;

(e) in relation to our Customers, your appointed representatives or other parties you nominate, treating medical practitioners and specialists, and health and other service providers; and

(f) any other person or entity where permitted, authorised or required by law.

We ask that our customers, or your authorised representative, identify any parties to whom you do not wish personal information to be disclosed. We will record this information in your file and will comply with your instructions to the extent permitted by law.

Sundale may expand or reduce its business, and this may involve the sale and/or transfer of control of all or part of our business. Personal information, where it is relevant to any part of the business for sale and/or transfer, may be disclosed to a proposed new owner or newly controlling entity for their due diligence purposes, and upon completion of a sale or transfer, will be transferred to the new owner or newly controlling party to be used for the purposes for which it was provided.

Disclosure of personal information overseas

Sundale is assisted by a variety of external service providers, some of whom may be located overseas. These may include cloud-based software, information technology, communications and data hosting providers. Where overseas disclosures occur, Sundale takes reasonable steps to ensure appropriate privacy, confidentiality and security protections are maintained and that overseas recipients handle personal information in a manner consistent with applicable privacy requirements.

Security

Sundale stores personal information in different ways, including in paper and electronic form. The security of personal information is important to Sundale. Sundale takes reasonable technical, administrative and physical measures to ensure that personal information is protected from misuse, interference, loss, unauthorised access, modification and disclosure.

Personal information collected is wherever possible hosted on third party data servers located within Australia. Sundale takes reasonable steps to ensure these third-party data storage suppliers we partner with have appropriate cyber and physical security controls in place. Where personal information is no longer required for the purposes for which it was collected, Sundale will take reasonable steps to destroy or permanently de-identify the information unless it is required to be retained by law, regulation or other lawful authority.

Sundale maintains privacy, information security and cyber security controls that are designed to protect personal information against misuse, interference, loss, unauthorised access, unauthorised modification and unauthorised disclosure.

Data Breaches

Sundale maintains procedures for identifying, assessing and responding to actual or suspected privacy incidents and eligible data breaches. Where required by law, Sundale will notify affected individuals and relevant regulatory authorities of eligible data breaches. Sundale will take appropriate steps to contain, investigate and respond to privacy incidents in accordance with its Data Breach Reporting and Response Procedure.

Access and correction

You may access the personal information we hold about you upon making a written request. We will respond to a request within a reasonable period, and endeavour to process requests within 25 business days of receipt. We will not charge any fee for a request for access, but reasonable charges may apply where extensive copying, printing or postage costs are incurred.

We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will give you a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to make a complaint.

If you, upon receiving access to your personal information or at any other time, believe the personal information we hold about you is inaccurate, incomplete, or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete, and up to date.

If we refuse to correct your personal information, we will give you a written notice that sets out the reasons for refusal (unless it would be unreasonable to provide those reasons), including the mechanisms available to you to make a complaint.

Complaints and feedback

Sundale will acknowledge privacy complaints as soon as reasonably practicable and will seek to investigate and resolve complaints within a reasonable period.

If you have any queries, feedback, concerns or wish to make a complaint about Sundale's privacy policy or the way in which Sundale handles your personal information, please contact our Privacy Officer via the details below and we will endeavour to promptly review and resolve your enquiry or concern.

- Postal address:

Sundale Ltd,

Attention: Privacy Officer,

PO Box 5202 SCMC,

Nambour Qld 4560

- Telephone: 1800 786 325
- Email: privacy@sundale.org.au

We may need to verify the identity of the person making the complaint and may request additional details from you regarding your concerns. We may also need to engage or consult with other parties in order to investigate and resolve your concern/complaint. We will keep records of your request and any resolution.

If after this process, your concerns have not been resolved to your satisfaction, you can contact the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au or on 1300 363 992

Should you wish to lodge a complaint with the OAIC, further information is available at:

https://www.oaic.gov.au/privacy/privacy-complaints/

Resources and References

Internal

Code of Conduct and Ethics Policy

Privacy Collection Statement

External

Aged Care Act 2024 https://www.legislation.gov.au/C2024A00104

Privacy and Other Legislation Amendment Act 2024 (Cth)

Australian Privacy Principles https://www.oaic.gov.au/privacy/australian-privacy-principles

Privacy Act 1988 (Cth) https://www.legislation.gov.au

Office of the Australian Information Commissioner (OAIC) https://www.oaic.gov.au

PRIVACY: Sundale collects information according to the Privacy Act 1988 and the Australian Privacy Principles. A copy of our complete Privacy Policy is available on request or on our website.
This document is only current as at the time of printing and should not be relied upon as a current reference document. It is your responsibility to always refer to the Accreditation Portal for the latest version.
Version Control and Change History

Version	Approval Date	Reviewer/s	Amendment
V6	29.06.2020	Sundale Board, Sundale Executive Managers, Policy & Procedure Manager, Corporate Lawyers	Review under current laws
V7	09.05.2023	ELT and Sundale Board	Review for currency
V8	27.07.2026	Governance & Risk Committee Sundale Board	Review for currency, update to document number
V9	27.10.2026	Sundale Board	Policy reviewed following Privacy and Other Legislation Amendment Act 2024 reforms and December 2026 privacy transparency requirements.