



## Edenbridge Living privacy policy

Edenbridge Property Pty Ltd (ABN 25 637 884 210) (**Edenbridge Living, we, our, us**) recognises the importance of your privacy and that you have a right to control how your personal information is collected and used by us. We respect and value every person's right to privacy, dignity and confidentiality and recognise that the personal information we collect, use and hold is often sensitive.

This policy explains how we aim to collect, use, hold and disclose your personal information in accordance with the Australian Privacy Principles (**APPs**) and the *Privacy Act 1988* (Cth) (**Privacy Act**).

As a provider of specialist disability accommodation (**SDA**) to individuals who have extreme functional impairment or very high support needs and are approved for SDA funding in their National Disability Insurance Scheme Plan (**NDIS**) plan (**Services**), we are also required to comply with the privacy provisions in the *National Disability Insurance Scheme Act 2013* (Cth).

This privacy policy applies to all your dealings with us. By using our Website, communicating with us, enquiring about our Services or acquiring our services, you accept this privacy policy and consent to our collection, use and disclosure of your personal information by us as described in this document.

If you want require any further information, please use the contact details set out in section 15 of this privacy policy to get in touch with us.

In this policy, **Website** means <https://www.edenbridgeliving.com.au/> and includes any of our other websites or social media pages managed by us.

### 1 What is personal information?

Personal information is defined in the Privacy Act as information or opinion about an identified individual (or an individual who is reasonably identifiable) whether the information or opinion is true or not and whether the information or opinion is recorded in material form or not.

Sensitive information is a subset of personal information that is afforded higher levels of protection under the Privacy Act. It includes information or opinion about an individual's racial or ethnic origin, political opinion, religious beliefs, sexual orientation, criminal record or health information.

Health information is a type of sensitive information and includes information or an opinion about the physical or mental health of a person, or the disability of an individual.

References in this policy to personal information include sensitive information and health information.

### 2 Collection of personal information

In order to provide you with our Services, we often need to collect your personal information which is reasonably necessary for us to provide you with our Services. Depending on the nature of the Services we provide to you, the personal information we collect may include:

- contact details (i.e., your name, address, email and phone details);
- gender, date of birth, details about your physical or mental health, including disabilities;
- details of emergency contacts, guardians and nominees;
- Centrelink Customer Reference Number;
- your NDIS plan and other information relating to your NDIS funded supports;
- information about your employment (e.g., place of work, position, authority to transact with us, etc.);

- relevant financial details including any details of your SDA funding and other NDIS funding;
- information required for you to do business with us or receive our Services including bank account details, credit card information and any other relevant financial information;
- information on prior dealings with us;
- sensitive information about you relevant to the Services that we provide to you from your support networks, such as but not limited to, allied health professionals, support coordinators, occupational therapists, behaviour support practitioners and assistive technology providers; and
- any other personal information relevant to the Services we provide.

We may collect personal information through:

- you directly;
- third party service providers we engage to assist us to engage with you to understand your needs and which of our SDA homes may be most suitable;
- our Website;
- when you contact us or make inquiries or place requests for our Services;
- your support networks, for example but not limited to health professionals, , NDIS support providers, support coordinators, occupational therapists, behaviour support practitioners or assistive technology providers;
- government agencies;
- your guardian or any other person authorised as your representative;
- requests to join a mailing list or to be contacted for further information about our Services; and
- responses to surveys or research conducted by us or on our behalf, and by providing feedback or complaints to us.

Wherever reasonably possible we will collect your personal information directly from you. We may also collect your personal information from third parties with your consent, where you would reasonably expect us to collect the information in this way, or as otherwise permitted by law.

We will assume that you have consented to us collecting all information that is provided to us in accordance with this policy, including any sensitive information, unless you tell us otherwise at the time you provide it to us.

If you provide us with personal information about a third party, you represent to us, and we collect it on the basis that, the person agrees to us collecting and handling their personal information in accordance with this privacy policy.

### **3 What happens if you wish not to provide us with your personal information**

You can choose to deal with us anonymously, in which case your personal information is not subject to privacy laws. You can also choose not to provide all the requested personal information.

While you can chose how much personal information (if any) you provide to us, if any of the personal information you provide is incomplete or inaccurate, we may not be able to provide you with the Services or those Services may be compromised or delayed.

#### **4 How do we deal with your personal information**

We use your personal information in a variety of ways. Our main purposes for collecting, holding, using and disclosing personal information include (but are not limited to) the following:

- to provide our customers with our Services;
- to determine eligibility of our customers to entitlements and Services;
- to communicate and contact with you in relation to our Services, business operations and any developments or new service offerings;
- to distribute material and general information relating to our activities;
- to obtain products and services from our suppliers;
- to comply with government funding requirements and legal obligations;
- to develop and improve our programs, Services and content;
- to respond to enquiries from existing or prospective customers seeking information about our Services;
- to undertake research and surveys and analyse statistical information;
- to comply with contractual, legislative and policy requirements including in relation to occupational health and safety and environmental matters; and
- as otherwise permitted or required by law.

#### **5 Disclosure of personal information**

We collect, hold, use and disclose personal information for the purpose of providing Services, conducting our operations; communicating with our customers, participants, health service providers and government agencies; and complying with our legal obligations.

We aim only to use or disclose personal information for a purpose other than for which it was collected or a related purpose that you would reasonably expect, or with your consent, or as otherwise allowed by the Privacy Act.

Examples of how we may disclose your personal information include:

- if you agree to the disclosure;
- when we use it for the primary purpose for which it was collected (e.g., to provide you with Services);
- if you would reasonably expect us to disclose the information for a secondary purpose related to the primary purpose;
- where disclosure is required or permitted by law or court order or to investigate suspected fraud or other unlawful activity;
- to our related entities (if any) in accordance with the Privacy Act;
- to our contractors we use to support our business (including client engagement, IT support and other IT services, delivery services and financial institutions);
- to our suppliers, health care professionals and health service providers and government agencies, for example the NDIS Quality and Safeguards Commission;
- if disclosure will prevent or lessen a serious or imminent threat to someone's life or health;  
or

- as otherwise permitted or required by law.

We are required not to disclose sensitive information about you (including health information) unless we have your consent or the disclosure is directly related to the primary purpose of collection of the information.

At the commencement of a Service with us we will ask for consent to share your personal information with third parties, such as health professional, relevant funding or government bodies, potential providers of in-home supports, companies and contractors retained to provide services for us, for example client engagement contractors or occupational therapists. This is required as part of assessing whether our Services meet the requirement of your NDIS plan and later, being able to provide our Services to you. This consent should be updated whenever the intended use of the personal information needs to change.

You may change or revoke your consent to disclose information at any time by notifying us in writing.

## **6 Off-shore disclosure of personal information**

We may use cloud service providers such as Google Workspace to store and process your personal information. Before we disclose your personal information offshore, we aim to take all reasonable steps to ensure that the overseas recipient of the personal information does not breach the APPs under the Privacy Act. Please note that these requirements do not apply if one of the exceptions below applies:

- you consent to the disclosure, after being informed by us that the receiving entity will not be accountable for breaches, and you will not be able to seek redress under the Privacy Act;
- we reasonably believe that the entity is subject to privacy laws or a binding scheme substantially similar to the Privacy Act, and that you are able to access the mechanisms that enforce the protection of the law or binding scheme; or
- disclosure is required or authorised by or under an Australian law or a court/tribunal order.

## **7 Storage and security**

We endeavour to keep our information systems and files secured from misuse, interference, loss, unauthorised access, unauthorised modification and unauthorised disclosure. Those who work with us are aware of the importance we place on protecting your privacy and their role in helping us to do so.

We have systems and procedures in place to protect personal information from misuse and loss, as well as from unauthorised access, modification or disclosure. These steps include:

- electronic and physical security measures, for example, our premises have secure access;
- staff training;
- access to personal information is on a need-to-know basis, by authorised personnel; and
- use of password protection software.

When the personal information that we collect is no longer required, we aim to remove or de-identify the personal information as soon as reasonably possible. We may, however, retain personal information for as long as is necessary to comply with any applicable law, for the prevention of fraud, for insurance and governance purposes, for the collection of any monies owed and to resolve disputes.

## **8 Access to and correction of personal information**

You are welcome to request that we provide you with access to the personal information we hold about you by contacting us using the contact details listed in section 15 below. Generally, we will

provide you with access to the information unless applicable laws allow us to refuse, or prevent us from giving you, access to the personal information we hold about you.

You may also lodge a request to correct personal information we hold about you if you believe it is inaccurate, incomplete, irrelevant, misleading or out of date. To do so, please contact us using the contact details listed in section 15 below.

## **9 Direct marketing**

Like most businesses, marketing is important to our success. We may use personal information we hold about you, from time to time, to send marketing materials to current or prospective customers. Generally, we only do so if you consent or if allowed by applicable laws.

Our communications to you may be sent in various forms such as by post or by electronic means (including e-mail and SMS).

If you wish to cease receiving this information, please contact us directly using the contact details listed in section 15 below asking to be removed from our mailing lists, or use the unsubscribe facilities included in our marketing communications.

## **10 Our Website**

We sometimes use cookie technology on our Websites to provide information and services to web site visitors. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes and are a necessary part of facilitating online transactions. Most web browsers are set to accept cookies. Cookies are useful to estimate our number of members and determine overall traffic patterns through our websites.

We may also collect statistical information regarding the use our Website, including the domains from which website users visit, IP addresses, the dates and times of visits, activities undertaken on our Website and other clickstream data.

If you do not wish to receive any cookies, you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of the services on the Website.

In addition, we sometimes use web beacon technology to monitor internet activity on our Website. A web beacon is a clear-pixel image that generates an anonymous de-identified notice of a Website visit when viewed. A web beacon usually works in conjunction with a cookie. If you set your browser to refuse cookies, a web beacon may still be able to generate a notice of your visit but it will not be associated with the information contained in cookies.

## **11 Third party links**

Our Websites may contain links to third party websites. These linked sites are not under our control and we are not responsible for the content of those sites nor are those sites subject to our privacy policy. Before disclosing your personal information on any other website we recommend that you examine the terms and conditions and privacy policy of the relevant site. We are not responsible for any practices on linked websites that might breach your privacy.

## **12 Employment and recruitment**

This privacy policy does not apply to the handling of information about employees by us.

If you send us an application for a position, this information will be used to assess your application. This information may be used and disclosed for the purposes of assessing the quality of your application and conducting checks such as a referee check and any other check as may be required by law or us to assess your suitability for the position.

If you refuse to provide any of this information, or to consent to its proposed disclosure, this may affect the success of your application.

### 13 Notifiable data breaches

A notifiable data breach scheme is currently in place in Australia. We are committed to adhering to this scheme as an important step in preventing and managing serious privacy breaches.

A **data breach** means unauthorised access to, or disclosure, alteration, loss, or destruction of, personal information—or, an action that prevents us from accessing personal information on either a temporary or permanent basis. An **eligible data breach** occurs when there is a data breach that is likely to result in serious harm to any of the individuals to whom the information relates, and we are unable to prevent the likely risk of serious harm with remedial action.

We, including all our people, take breaches of privacy very seriously. If we suspect a privacy breach has occurred, our priority is to contain and assess the suspected breach. In doing so, we aim to:

- take any necessary immediate action to contain the breach and reduce the risk of harm;
- determine the cause and extent of the breach;
- consider the types of information involved, including whether the personal information is sensitive in nature;
- analyse the nature of the harm that may be caused to affected individuals;
- consider the person or body that has obtained or may obtain personal information as a result of the breach (if known); and
- determine whether the personal information is protected by a security measure.

If we believe an eligible data breach has occurred, our goal is to notify the Office of the Australian Privacy Commissioner and all affected individuals as soon as practicable, or, if it is not possible to notify affected individuals, provide public notice of the breach (in a manner that protects the identity of affected individuals).

### 14 Changes to our privacy policy

We reserve the right to change this privacy policy at any time and notify you by posting an updated version of the policy on this Website. We recommend that you review our privacy policy each time you visit this website or provide us with personal information.

### 15 Contacting us & complaints

If you have any enquiries or complaints about how we handle your personal information, or if you have any questions about this privacy policy, please contact us by contacting our privacy officer at:

**Attention:** The Privacy Officer  
**Mail:** PO Box R1849 Royal Exchange NSW 1225  
**Email:** residentsupport@edenbridgeliving.com.au

We will aim to respond to your query within 30 days.

More information about your rights and our obligations in respect to privacy and information on making a privacy complaint are available from the Office of the Australian Information Commissioner at:

**Website:** [www.oaic.gov.au](http://www.oaic.gov.au)  
**Post:** GPO Box 5218, Sydney NSW 2001  
**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

[March 2024, version 1]