

PRIVACY POLICY

This Privacy Policy (**Policy**) applies to Maxlife Care Corp Pty Ltd ACN 644 546 494 and subsidiaries ("**Maxlife**", "**we**", "**us**" or "**our**"). This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including through our website (**Platform**) and describes how Maxlife collects, handles and protects the privacy of your personal information.

This Policy outlines the types of personal information that we usually collect, the purposes for which we collect it, to whom we disclose it, how we hold and keep it secure and your rights in relation to your personal information, including how to complain and how we deal with complaints.

We will handle your personal information in accordance with this Policy, legislation including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) and the *Health Records and Information Act 2002* (NSW) (**HRIP Act**).

In this Policy, **personal information** means information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable. It does not include information that is de-identified.

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Australian Privacy Principles.

Sensitive information means information relating to a person's racial or ethnic origin, political opinions, memberships of a political association, religious beliefs or affiliations, membership of a trade union or other professional or trade associations, philosophical beliefs, sexual orientation or practices, criminal records, health information, genetic information or biometric information.

Health information means:

- information or an opinion about:
 - the health, including an illness, disability or injury, of an individual; or
 - the individual's expressed wishes about the future provision of health services to the individual; or
 - a health service provided, or to be provided, to an individual,

that is also personal information;

- other personal information collected to provide, or in providing, a health service to an individual;

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- other personal information collected in connection with the donation, or intended donation, by an individual of his or her body parts, organs or body substances;
- genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

This Policy does not apply to the personal information of our employees.

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our Platform. We recommend you check our Platform regularly to ensure you are aware of our current Privacy Policy.

Types of personal information we collect

The types of personal information we collect about you depends on your dealings with us and may include:

- your name;
- your contact details, including email address, mailing address, street address and/or telephone number;
- your age and/or date of birth;
- your demographic information, such as postcode;
- your preferences and/or opinions;
- information you provide to us through customer surveys;
- details of services we have provided to you and/or that you have enquired about, and our response to you;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Platform, including through the use of Internet cookies, your communications with our Platform;
- additional personal information that you provide to us, directly or indirectly, through your use of our Platform, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.

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If you are applying for a job with us, we may collect your:

- employment history and qualifications;
- academic records;
- references;
- medical information;
- personal alternative contact details;
- superannuation fund details; and
- criminal history record.

Sensitive information

The type of sensitive information we may collect about you includes but is not limited to health information, such as details of any current or previous medical conditions, copies of previous health records, your Medicare number, prescription information, tests results or scans.

We will not collect sensitive information about you without first obtaining your consent.

Your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected, including:

- to connect you with disability and health related service providers, support workers, educators and/or other personnel;
- to assist you with your inquiries, including to be connected with a disability and health related service provider, support worker, educator or other relevant personnel;
- to assist a disability and health related service provider, support worker, educator or other relevant personnel in determining whether they can provide services to you;
- coordinating with accommodation or housing support services; and/or
- providing services for a purpose that is directly related to the primary purpose for which the sensitive information was collected.

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If we have de-identified your sensitive information, such that you are no longer identifiable from it, we may also use that de-identified information for the purpose of analysing trends and conducting research/publication, including by disclosing that de-identified information to third parties. Sensitive information may also be used or disclosed if required or authorised by law.

Dealing with us anonymously or using a pseudonym

Where possible and lawful, you may interact with us anonymously or using a pseudonym. For example, if you contact us with a general question we will not record your name unless we need it to adequately handle your question.

However, for many of our functions and activities we usually need your name, contact information and other details to enable us to provide our services or products to you.

Ways we collect your personal information

We collect information in various ways, including (though not limited to):

- from you directly when you interact with us, for example over the phone, in writing, in person or over the internet;
- through third parties with whom we interact to provide our services;
- in emergency situations, we may need to collect information from your relatives or friends; and
- publicly available sources, including social media.

If you apply for a job or contract position with us, we may also collect personal information about you from third parties and publicly available sources, including:

- recruiters;
- government departments to verify your entitlement to work in Australia;
- police agencies to obtain your criminal history record;
- academic institutions;
- consulting medical practitioner;
- superannuation fund provider;
- your current or previous employers; or

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- your referees.

Purposes for which we collect, use and disclose personal information

We may collect, hold, use and disclose personal information for the following purposes:

- to provide you with care, support and any other disability or health related services as set out on the Platform;
- to manage and conduct our business;
- to enable you to access and use our Platform, courses, educational material, associated applications and associated social media platforms;
- to enable you to use our Platform, services available on the Platform, to find and connect with disability and health related service providers, support workers and educators, and other service providers available to provide services to you;
- to contact and communicate with you;
- to obtain feedback;
- for internal record keeping and administrative purposes;
- for analytics, market research and business development, including to operate and improve our Platform, associated applications and associated social media platforms;
- to offer additional benefits to you;
- for advertising and marketing, including to send you promotional information about our products and services;
- to consider your suitability for employment; and
- to comply with our legal obligations, resolve any disputes and enforce agreements and rights with third parties.

Disclosure of personal information

In the course of providing our products and services to you, we may disclose your personal information with the following:

- third party service providers for the purpose of enabling them to provide their services to us;

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- disability and health related service providers, support workers, educators and/or other personnel, for the purposes of providing you with services;
- our employees, contractors and/or related entities, to the extent necessary to provide you with our services and/or access to our Platform;
- other third party service providers to whom disclosure is necessary to provide you with services through the Platform, such as IT, data storage, web-hosting and server providers;
- our existing or potential agents or business partners;
- third parties to collect and process data, such as Google Analytics or other relevant businesses;
- our employees, contractors and/or related entities, to the extent necessary to provide you with our services and access to our Platform;
- payment systems operators, including but not limited to Commonwealth Bank of Australia, but only to the extent required to make payment;
- our professional advisers, such as our solicitors, accountants and auditors;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred, on the condition that they handle your personal information in accordance with this Privacy Policy;
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you; and
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights.

Where we disclose your personal information to third parties, including disability and health related service providers and support workers, we will request that the third party handle your personal information in accordance with this Privacy Policy.

Direct marketing

We may use your personal information to identify a product or service that you may be interested in or to contact you about news, events or promotions. We may, with your consent, use the personal information we have collected about you to contact you from time to time whether by phone, email or SMS to tell you about new products or services and special offers that we believe may be of interest to you.

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You can withdraw your consent to receiving direct marketing communications from us at any time by unsubscribing from the mailing list by clicking on the link in the marketing communication or contacting the Privacy Officer on the details below.

Access to and correction of your information

We will endeavour to ensure that the personal information collected from you is up to date, accurate and complete.

Access: You may request access to the personal information that we hold about you by contacting the Privacy Officer. An administrative fee may be payable for the provision of such information. In certain circumstances, as set out in the Privacy Act, we may refuse to provide you with personal information that we hold about you.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any personal information we hold about you.

We will need to verify your identity before responding to your request to access or correct your personal information. Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request, or correction of your personal information, within a reasonable time and usually within 28 days. If we decide to refuse your request, we will tell you why in writing and how to complain.

Rights of individuals located in the European Union (EU)

In addition to the Privacy Act, individuals located in the European Union (EU) may also have rights under EU based rules known as the General Data Protection Regulation (GDPR). The key obligations under the GDPR include Notice, Individual Rights, and Retention. Each user has a right of confirmation (to confirm whether or not Personal Information concerning the user is being processed), access (the right to request what Personal Information is stored about the user and obtain a copy of that said information), erasure (the right to request that any Personal Information concerning the user be erased without delay when no longer required, or when the user withdraws consent), rectification (the right to rectify any inaccurate information concerning the user), portability (the right to receive the Personal Information concerning the user, which was provided to us, in a readable format), object (the right to object the processing of the Personal Information concerning the user unless we can demonstrate compelling legitimate grounds for the processing which overrides the interests, rights, and freedoms of the user/data subject, or for the establishment, exercise or defence of legal claims), restriction of processing (the right to restrict processing where the accuracy of the Personal Information is contested by the user/data subject for a period enabling the controller to verify the accuracy of the Personal Information; or the processing is unlawful and the user/data subject opposes the erasure of the Personal Information and requests instead the restriction of their use instead; or we, the controller, no longer need the Personal Information for the purposes of the processing, but they are required by the user/data subject for the establishment, exercise or defence of legal claims), as set out in Articles of the General Data Protection Regulations of the EU.

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Complaints

If you believe that we have breached the Australian Privacy Principles and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you within a reasonable period of time, in writing, setting out the steps we will take to deal with your complaint and the outcome of our investigation.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (**OAIC**) via the OAIC website, www.oaic.gov.au.

Storage and security

We are committed to ensuring that the personal information we collect is secure. We store your personal information within our client record management system in hard copy and electronically. Electronic information may be stored by a third party storage provider. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

We only keep your personal information for as long as it is required for the purpose for which it was collected or as otherwise required by applicable laws. If we no longer need to hold your personal information for any reason or we are no longer required by law to keep it, we will take reasonable steps to de-identify or destroy that information. These steps may vary depending on the nature of the information, the way it was collected and how it was stored.

Cookies and web beacons

We may use cookies or other similar technologies on our Platform from time to time. Cookies are text files that store information, such as your preferences, on your computer, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services and devices, and/or browsing sessions. You can disable cookies through your internet browser but our Platform may not work as intended for you if you do so.

Cookies, by themselves, do not tell us your email address or other personal information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our Platform with personal information, this information may be linked to the data stored in the cookie.

Whilst we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit, search engine referrals and the internet protocol address assigned to your computer.

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We may use web beacons on our Platform from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page. Web beacons are not used by us to access your personal information.

Links to other websites

Our Platform may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Contact us

If you have a question or comment regarding this Policy or wish to make a complaint or exercise any privacy rights, please contact our Privacy Officer at:

Maxlife Care Corp Pty Ltd ACN 644 546 494
Level 1, Unit 3, 575-597 Pacific Highway
St Leonards, NSW 2065

Email: info@maxlifecare.com.au
Phone: 1800 100 629

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