

Privacy Policy

We are committed to protecting your personal information in accordance with the Australian Privacy Principles contained in the Privacy Act 1988, and to adopt best practice processes for handling your personal information.

In force from	9 July 2026
Approved by	Fresh Hope Communities' Board
Next review due	2027

1. Overview

This Privacy Policy sets out how we will collect, hold, use and disclose your personal information.

In this Policy, 'Personal Information' is any information or an opinion about an individual who is identified or reasonably identifiable, whether true or not and whether recorded in a material form or not. 'Sensitive Information' is a sub-set of Personal Information, and includes information relating to your health, racial or ethnic origin, religious beliefs and criminal record.

The Policy applies to Churches of Christ Community Care trading as Fresh Hope Communities (ABN 41 041 851 866).

2. The type of information we collect

The type of Personal Information we collect and hold will depend on your relationship with us, the nature of the service we are providing or the activity you are involved in, and the legal obligations we may have. We only collect information that is reasonably necessary to perform or carry out one of our functions or activities.

The personal information we may collect about you includes:

- information that is required to identify you, such as your date of birth
- your contact details (including emergency contact information)
- health information, such as your medical and family history, immunisation records, test results, care plans prepared by medical practitioners and allied health professionals
- relevant information about a third party, such as your appointed guardian, registered Supporter and/or your Power of Attorney
- information about your work history (if you work for us), including your qualifications and membership of professional associations, results of criminal records checks, and other checks that may be required if you work with children and/or in aged care
- information about when and how you access any of our websites and other platforms (see 'Cookies and Analytics' below)
- your preferences in receiving marketing and communications from us.

You may choose to not identify yourself, or to use a pseudonym, when dealing with us in relation to a particular matter unless:

- we are required or authorised by or under an Australian law, or a court/tribunal order, to deal with individuals who have identified themselves, or
- it is impracticable for us to deal with someone who has not identified themselves or who has used a pseudonym.

3. How we collect your personal information

We will collect your personal information (including sensitive information) from you directly, unless it is unreasonable or impracticable to do so.

Personal information is collected in a variety of ways, including from:

- you, when you provide it directly to us (or to our agents or contractors)
- your authorised family members, guardians, or nominated representatives
- information we obtain as a result of you using our services and any website we operate
- third parties, such as health care practitioners and hospitals
- government agencies, such as My Aged Care or the Department of Health, National Disability Insurance Agency (NDIA)
- publicly available sources.

We will take all reasonably practicable steps to ensure that the personal information we collect is accurate, complete and up-to-date.

We will only collect information from third parties where you have consented to that collection, or if it is legally permissible for us to do so. When we receive information about you from a third party, we will take reasonable steps (before or at the time of collection, or as soon as practicable after collection) to let you know that we have collected your personal information, and the circumstances of that collection.

If you provide us with Personal Information about a third party, for example your legal personal representative or emergency contact, you acknowledge and agree that the person consents to us collecting and handling their personal information in accordance with this policy.

4. Reasons that we collect, hold, use and disclose your personal information

We collect, use and disclose your personal information for reasons associated with the provision of services to you, including to:

- verify your identity and ensure our records are up-to-date
- contact you and respond to any questions you ask us
- facilitate the provision of our services and programs
- manage our internal record keeping, administrative, and billing processes
- operate and improve our services
- manage your participation as a volunteer
- inform you about our existing and proposed events, services and programs and information we consider may be of interest to you;
- coordinate with healthcare providers, government agencies, and other relevant organisations
- assess your suitability for employment opportunities, to inform you of availability of employment opportunities, or consider your employment application
- comply with our legal obligations or if otherwise required or authorised by law.

We will also collect personal information for purposes related to those set out above in circumstances where you would reasonably expect us to collect the information.

You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide you services, communicate with you, employ you, or work with you as a supplier. If you do not want to provide personal information to us, or have concerns about providing it, please contact us.

5. Reasons that we collect, use and disclose your sensitive information

We will not collect or use or disclose your sensitive information unless you have consented to it, or if:

- you would reasonably expect us to use the sensitive information for a secondary purpose that is directly related to the primary purpose for which it was collected
- to contact emergency services, or to speak with your family, partner or support person where we reasonably believe there is a serious risk to the life, health or safety of you or another person and it is impracticable for us to obtain your consent
- if otherwise required or authorised by law.

6. Disclosing your personal information to others

We may need to disclose your personal information to third parties in some circumstances. For instance, we may disclose your personal information to:

- anyone that you ask us to disclose the information to
- other aged care providers or retirement living operators, if you transfer to or from our facilities
- healthcare providers, including doctors, specialists, emergency services, and allied health professionals
- government agencies, such as the Department of Health and Aged Care or My Aged Care
- courts, tribunals and regulatory authorities such as the Aged Care Quality and Safety Commission
- relevant third parties for the purposes of undertaking pre-employment screening and checks
- our contractors, agents and service partners
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights
- third parties to collect and process data, such as analytics providers and cookies; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Please note that your personal information will be disclosed:

- to a registered Supporter or independent aged care advocate in accordance with s.156 of the *Aged Care Act 2024* (Cth)
- as required under s.69 of the *Retirement Villages Act 1999* (NSW).

7. Information that you generate or publish

In some circumstances, we may enable you to post reviews, comments, photos and other user-generated content on our website or applications that we manage. You should keep in mind that any content you choose to submit will be accessible by anyone, including third parties not associated with us. We have no control over how others may use or misuse information you make publicly available. We are not responsible for the privacy, security or accuracy of any user-generated content you choose to post or for the use or misuse of that information by any third parties.

8. Storing and securing your personal information

We are committed to ensuring that the personal information we collect is stored securely.

All personal information that we collect is required to be stored in data centres in Australia, and we take all reasonably practicable steps to ensure that this requirement is complied with. We have implemented a range of physical and electronic controls including electronic access controls, network monitoring systems and firewalls, as well as put in place suitable physical, electronic and managerial procedures, to protect personal information from misuse, interference, loss and unauthorised access, modification and disclosure. We engage a third party to undertake annual penetration testing to ensure our systems and network are secure and take immediate action if any issues are identified.

We employ additional safeguards for sensitive information, particularly health records, including secure electronic health record systems and strict protocols for handling physical records. The measures we take to protect personal information take into account the requirements of s.168 of the *Aged Care Act 2024* (Cth).

When your personal information is shared electronically with us, for instance via our website, we will take all reasonable steps to ensure that it is transferred to us securely, including using appropriate encryption. You should be aware, that despite our best efforts, the transmission and exchange of information is carried out at your own risk. Similarly, our website may contain links to other party's websites. We do not have any control over those websites, and we are not able to protect the privacy of any personal information that you provide whilst visiting those websites.

When the personal information that we collect is no longer required, we will take all reasonable steps to remove or de-identify the personal information. 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, in our IT back-up, for the collection of any monies owed and to resolve disputes.

9. Overseas disclosure

If we share your personal information to an authorised third party, we will take all reasonable steps to require that third party to comply with the Australian Privacy Principles, and to only store, transfer or access personal information within Australia.

We will only allow your personal information to be shared outside Australia if doing so is in accordance with the Australian Privacy Principles, and:

- you have asked us to (or consented to us doing so) or
- we are required by law to do so.

10. Accessing and correcting your personal information

You may request access to the personal information that we hold about you by contacting us as via the details below. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

An administrative fee may be payable to cover the retrieval and supply costs to provide you with the information requested (noting that in accordance with s.197 of the *Retirement Villages Act 1999* (NSW) no fees will be charged to a resident of a Retirement Village who is seeking access to their personal information under s.69 of that Act).

If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us. We will verify and (where applicable) correct the information. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will let you know why.

11. Complaints

If you have any questions about any of the matters in this Privacy Policy, or wish to make a complaint, please contact us using the details below.

We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. We will aim to respond to any complaint within 30 days.

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner (OAIC)
www.oaic.gov.au.
GPO Box 5288 Sydney NSW 2001.
phone 1300 363 992

If you have concerns about the care or services you receive in one of our residential care services, you can contact the Aged Care Quality and Safety Commission:

Phone: 1800 951 822

Web: www.agedcarequality.gov.au

12. Use of Analytics

We use cookies and similar tracking technologies on our website and in our emails. These tools do not identify you but they help recognise your device when you return to our websites and may enable our ads to appear in your digital media feeds. If you provide us personal information through our websites, it may be linked to data collected via cookies or other tracking tools. You can disable cookies in your browser settings, but doing so may limit your access to certain features and personalised content.

Tracking tools we may use include:

- Cookies – small text files stored on your device that help us recognise repeat visitors and remember preferences.
- Web Beacons (also known as clear GIFs or pixel tags) – tiny graphics embedded in emails or web pages that track whether content has been viewed.
- Pixels – code snippets that allow us to track user behaviour and conversions, often used in advertising.
- JavaScript Tags – scripts that collect data about user interactions on our website.
- Local Storage – browser-based storage that retains data even after the browser is closed.

We may use Google Analytics Advertising Features which are first-party cookies (e.g. Fresh Hope Communities) and third-party cookies (e.g. villages.com.au or downsizing.com.au) or device IDs (used within iOS and Android devices) that collect technical and usage data, such as your IP address, browser type, pages visited, and time spent on our site. This information helps us analyse website traffic and improve our services to you – for you and or a loved one.

Additionally, we may use tracking tools to measure the performance of our advertising on social media platforms, and to deliver advertisements that are more relevant to you based on your website activity. You can control how your data is used by adjusting your settings in your social media accounts and through tools such as the Google Ads Settings and Fresh Hope Communities' websites' opt-out page on electronic direct mail (eDMs) sent to you.

13. How to contact us

Our websites may contain links to other party's 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.

You can contact us using the details below if:

- You have a question about access and/or correcting your personal information that we hold
- You wish to make a complaint about our compliance with this Privacy Policy or with the Australian Privacy Principles
- If you would like to unsubscribe from any of our email databases and/or opt-out of communications (including marketing communications).

The Privacy Officer

Fresh Hope Communities

PO Box 3561, Rhodes NSW 2138

Email: privacy@freshhope.org.au

Phone: +61 2 8573 6000

We may amend this Privacy Policy from time to time. We will publish the updated Policy on our website. We recommend you check our website before providing us with your personal information to ensure you are aware of our current Privacy Policy.