ROSEWOOD

welcome home

Privacy Policy

ROSEWOOD CARE GROUP

Contents

Document Information 1

Purpose 3

Collecting information 3

- Residents and prospective residents 3
- Families, Supporters, representatives and emergency contacts 4
- Job applicants 4
- Employees, volunteers, students and contractors 5
- Donors 5
- Suppliers and business contacts 5
- Visitors to our online platforms 6
- All groups 6

How we collect Personal Information 6

Use of Personal Information 7

Disclosure of Personal Information 7

Storage and security 8

Access to and correction of Personal Information 8

Promotions and marketing 9

Our online platforms 9

Third parties 9

Privacy breaches 10

Changes to our Privacy Policy 10

Getting in touch 10

Dictionary 11

Document Information

Title	Privacy Policy
Status	Approved
Document Classification	Policy
Functional Area	Governance
Document Number	POL-GOV-021
Version	1.0
Effective Date	29 September 2026
Review Date	Three yearly or when legislation changes
Responsible Executive	General Manager Finance
Enquiries Contact	General Manager Finance

Audience

Group	Role in Policy
Board	Accountable oversight
Finance, Audit, Risk and Governance Committee	Monitoring oversight
Chief Executive Officer	Implementation authority
General Manager Finance	Operational Management and oversight
General Manager Quality, Risk and Compliance	Assurance and monitoring
Delegated staff	Compliance and controls
Residents, prospective residents, their families, Supporters and appointed decision makers	Available on Rosewood website and in relevant resident materials
Employees, volunteers, students and contractors	Compliance when handling Personal Information, and awareness of how their own information is handled
Job applicants, donors, suppliers and members of the public	Available on Rosewood website

Communication Requirements

Mechanism	Target Audience
Governance document register	General Manager Quality, Risk and Compliance
Document management system	General Manager Quality, Risk and Compliance
Delegation-specific briefing	Senior Operational management
Induction program inclusion relevant persons	Person responsible
Three yearly refresher communication	General Manager Finance

Rosewood will communicate policy releases through Centro Assist and support ongoing awareness through compliance reminders, management meetings and internal audit updates.

Training Requirements

- Rosewood Board members – on induction and 3 yearly thereafter
- All aged care workers (including volunteers, students on placement, contractors, and consultants - on induction and every three years thereafter.
- Associated providers, including contractors, consultants, and other services providers as relevant - on induction and every three years thereafter.

Version Control

Version	Author	Date	Changes
1.0	GM Quality, Risk and Compliance	21/09/2026	New Policy

Endorsement

Date	Name	Position	Signature
23/09/2026	Fiona Barclay	Finance, Audit, Risk & Governance – Chair	F Barclay

Approval

Date	Name	Position	Signature
23/09/2026	John Pirie	Board Chair	

Purpose

This policy details Rosewood's systems and processes relating to the collection, use, disclosure and retention of Personal Information to ensure we comply with our legislative privacy obligations, including the Privacy Act 1988 (Cth) (the Privacy Act), the Aged Care Act 2024 (Cth) (the Aged Care Act), and any other applicable privacy and health records obligations.

It applies to residents, prospective residents, their families, Supporters and representatives, employees, volunteers, contractors, job applicants, donors, suppliers and anyone else whose Personal Information Rosewood holds. The Collecting information section sets out what we collect for each of these groups.

Collecting information

The Personal Information we collect depends on your relationship with Rosewood. Use the headings below to find the information that applies to you. If you belong to more than one group (for example, a family member who is also a volunteer), each relevant section applies.

Residents and prospective residents

To provide you with appropriate care and services, we need to collect your Personal Information. Our ability to provide care and services may be impacted if we hold incomplete or inaccurate information.

The Personal Information we collect about residents and prospective resident may include:

- contact details, such as your name, gender, date of birth, postal address, email address and phone number;
- your image, which may be stored in a photograph or electronically;
- health information, such as your medical history, vaccination status and mobility capabilities;
- if relevant, passive monitoring data to support care and services (for example sensors or call systems in our residential care homes);
- demographic information, such as whether you are an Aboriginal or Torres Strait Islander;
- religious beliefs or ethnic background;
- contact details for any Supporters or medical professionals;
- information concerning any relevant attorneys, guardians, legal personal representatives or other decision makers authorised to act on your behalf;

- registration numbers for government services such as Medicare, the Department of Veterans' Affairs, My Aged Care and a pension card;
- health fund details, if applicable;
- information required for you to do business with us including your signature, bank account details, credit card information and any other relevant financial information, including information needed for means testing and fee assessment;
- information regarding any individual contributions made by you; and
- details of any complaints or feedback lodged by you or regarding services provided to you;

Families, Supporters, representatives and emergency contacts

If you are connected to a resident or prospective resident, for example as a family member, Supporter, attorney, guardian or emergency contact, we collect Personal Information about you so we can contact you and, where you are authorised, act on your instructions.

The Personal Information we collect about you may include:

- your name, relationship to the resident and contact details;
- your role, such as emergency contact, Supporter, attorney, guardian or other authorised decision maker, and documents confirming your authority to act (for example, an enduring power of attorney or guardianship order);
- financial information, if you pay fees or manage finances on the resident's behalf;
- records of your communication with us, including any complaints or feedback you lodge; and
- if you visit our homes, visitor sign-in records and any health screening information required at the time of your visit.

Where a resident provides your details to us, we handle your information as described under How we collect Personal Information and in accordance with this policy.

Job applicants

If you apply for a position with Rosewood, your Personal Information, including employment history, educational background, qualifications, screening checks and reference details may be used to assess your application and suitability for employment with us. This information may be disclosed to our service providers for purposes such as aptitude and psychological testing, pre-employment screening or other human resources management activities.

Employees, volunteers, students and contractors

If you work or volunteer with Rosewood, including as a student on placement or an individual contractor, we collect Personal Information needed to engage you, manage your work and meet our obligations as an aged care provider.

The Personal Information we collect about you may include:

- contact details and emergency contact details;
- identity, visa and right to work information;
- worker screening outcomes, police certificates and other checks required for aged care workers;
- qualifications, professional registrations and training records;
- vaccination status and other health information relevant to your role or to workplace health and safety;
- for employees, Tax File Number, bank account, superannuation and payroll details;
- rosters, performance and conduct records; and
- records of workplace incidents and injuries.

Donors

If you make a donation to Rosewood, the Personal Information we collect may include:

- your name and contact details;
- the amount, date and history of your donations;
- payment details, which are processed securely as described under Our online platforms;
- information needed to issue tax receipts; and
- your communication preferences.

Suppliers and business contacts

If you or your organisation supplies goods or services to Rosewood, the Personal Information we collect may include:

- your name, position and business contact details;
- your ABN, bank account details and other information needed to pay you;
- insurance, licences and accreditations relevant to the goods or services you provide; and
- records of our dealings, including contract performance.

Visitors to our online platforms

If you use our websites or social media pages, please see Our online platforms for the information we collect.

All groups

Whichever group you belong to, we may also hold information about your prior dealings with us and any other information you provide to us from time to time.

How we collect Personal Information

We collect your Personal Information directly from you whenever possible, rather than from third parties.

We may also sometimes collect Personal Information through:

- family members, Supporters or attorneys authorised to act on your behalf, or as alternative contacts for you;
- forms (hardcopy and electronic) completed by you, in the course of our service delivery;
- My Aged Care, Services Australia, hospitals, general practitioners and other health or aged care providers involved in your care;
- third party service providers;
- provision of customer service and support;
- referrals from existing service users;
- our Online Platforms, including your interactions with us on our social media platforms;
- requests to join our mailing or distribution lists, or to be contacted for further information about our services;
- responses to surveys or research conducted by us or on our behalf; and
- debt collection agencies if you default in a payment to us.

If you are a job applicant, employee, volunteer, student or contractor, we may also collect Personal Information from referees, recruitment agencies, education providers, and screening and professional registration bodies.

If you are a donor or supplier, we may also collect Personal Information through fundraising and payment platforms, and from publicly available business registers.

We only collect and handle Personal Information that is provided by you, with your consent or where otherwise permitted by law. By providing us with your information (including Sensitive Information such as health information) or nominating someone

else to provide it, you consent to us collecting your information. We assume that you have consented to us collecting all information provided to us, unless you tell us otherwise at the time you provide the information.

If you provide us with Personal Information about a third party, for example your legal personal representative or emergency contact, we assume that you have their consent to provide us with this information, and we will handle their information in accordance with this policy.

Use of Personal Information

We will only use your Personal Information for the purpose it was given by you or on your behalf, for purposes connected to the delivery of a health or aged care service by us, or where you (or your attorney or Supporter) have consented to such use of your Personal Information. These may include:

- to supply health or aged care services;
- to notify you about new or existing services;
- to obtain services from our suppliers;
- to respond to an enquiry seeking information about the services we deliver;
- to undertake research and surveys and analyse statistical information;
- to improve our service delivery;
- to enforce agreements;
- to comply with any requirements imposed by legislation or regulation, including reporting to the Department of Health, Disability and Ageing, the Aged Care Quality and Safety Commission and Services Australia;
- to comply with contractual, legislative and policy requirements including in relation to occupational health and safety and environmental matters;
- to notify you about upcoming events and promotions; and
- as otherwise permitted or required by law.

Disclosure of Personal Information

Unless we have your consent, we will only disclose your Personal Information for the following reasons:

- for the purpose it was collected;
- for a purpose connected with the delivery of a service by Rosewood or one of our contracted service providers;
- to comply with our obligations under the Aged Care Act, the Privacy Act or any applicable state or territory health legislation, procedures or obligations; or

- where disclosure is required to be provided to a court, tribunal, authority or person with the power to request such disclosure.

Storage and security

Your Personal Information is stored and protected using suitable security measures designed to prevent misuse, loss, or unauthorised access, modification, or disclosure, as far as reasonably possible. Access to Personal Information is controlled through access and identity management systems. We have technology that prevents malicious software or viruses and unauthorised persons from accessing our systems.

Rosewood uses automated tools to assist with workflows, scheduling, ensuring appropriate funding, and other tasks related to the care we provide and the functions that enable that care, with human oversight. Where Rosewood uses artificial intelligence tools, it does so only through approved tools that operate within Rosewood's secure IT environment and in accordance with our organisational policies on privacy and confidentiality. Team members may only use approved tools and must not use any other AI tools for work purposes. Resident identifying and clinical information is not entered into AI tools. Clinical and care decisions at Rosewood are always made by people.

We regularly train and assess our staff in how to keep your Personal Information safe and secure. Our team is aware of privacy protection requirements and recognises its responsibilities in maintaining these standards.

When we send information overseas or use service providers that handle or store data, we require them to take steps to keep your information safe and use it appropriately.

We remove or de-identify Personal Information when it is no longer needed. However, we may keep this information as required by law, to prevent fraud, for insurance, governance, IT backup, debt collection, or dispute resolution.

Access to and correction of Personal Information

You, or your nominated representative, can request access to the Personal Information we hold about you. Generally, we provide access to your Personal Information unless the law prevents or allows us to refuse. Where requested or consented to by you, we can also provide the required information to an independent aged care advocate, to a new service provider, or an aged care volunteer visitor. We will not unreasonably deny access requests.

If we agree to give you access to your Personal Information, we may require you to cover reasonable costs. There is no charge to make an access request, and if approved, you will be informed of any applicable fee before proceeding.

You may also request corrections to Personal Information we hold about you if you believe it is inaccurate, incomplete, irrelevant, misleading or out of date. There is no fee for doing this.

Promotions and marketing

From time to time, we may use Personal Information we hold about you to send marketing material. Generally, we only do so where you consent or were allowed by applicable laws. Our communications may be sent in various forms including by post or by electronic means (including email and SMS).

If you do not want to receive marketing material from us, please contact our Privacy Officer and ask to be removed from our mailing lists, or use the “unsubscribe” or “update your preferences” options included in all our marketing communications.

Our online platforms

Some of our websites use ‘cookie’ technology.

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

When making a payment or donation to Rosewood online, your financial details are passed through a secure server using encryption technology. We regularly review our practices to ensure that residents, families and supporters are protected online. Personal Information collected with a donation is used to process the donation, issue tax receipts and send updates. All online payments and donations are processed in Australian dollars.

Third parties

In some circumstances we may receive information about you from third parties, such as another service provider. In such cases, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party and about your rights under this Privacy Policy.

Our Online Platforms may sometimes contain links to other websites operated by third parties for your convenience. We cannot provide any guarantees regarding their information handling policies or the content of these third-party websites, and we are not responsible for their practices. Before disclosing your Personal Information on any other platform, we recommend that you examine the terms and conditions and privacy policy of the relevant platform.

Privacy breaches

We take breaches of privacy very seriously. If we suspect a Data Breach has occurred, our priority is to contain and assess the suspected breach.

Any suspected information security or privacy incident is reported immediately through Rosewood's incident reporting process.

If we believe an Eligible Data Breach has occurred, we will, as soon as practicable, notify the OAIC, any other relevant regulatory body, and all affected individuals. If it is not possible to notify affected individuals, we will provide public notice of the breach, while protecting the identity of affected individuals.

Changes to our Privacy Policy

We reserve the right to amend this policy at any time. The version of the policy that is published on Rosewood's website will always be the current version.

Getting in touch

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 our General Manager Finance at:

Attention:	General Manager Finance, Rosewood Care Group Inc
Post:	200 Scarborough Beach Road, Mt Hawthorn 6016 WA
Email:	privacy@rosewood.org.au
Phone:	1300 971 771

We will assess and respond to your query promptly and consistently with our legal obligations. All complaints received will be taken seriously and handled with impartiality and discretion.

More information about your rights and our obligations in respect of privacy, and information on making a privacy complaint, is available from the Office of the Australian Information Commissioner (OAIC):

Website: www.oaic.gov.au
Post: GPO Box 5288, Sydney NSW 2001
Email: enquiries@oaic.gov.au

Complaints about aged care services more broadly may also be made to the Aged Care Quality and Safety Commission at www.agedcarequality.gov.au or on 1800 951 822.

Dictionary

Term	Meaning
APPs	means the Australian Privacy Principles under the Privacy Act which govern: • the standards, rights and obligations around the collection, use and disclosure of Personal Information; • privacy governance and accountability; • integrity and correction of Personal Information; and • the rights of individuals to access their Personal Information.
Aged Care Act	means the Aged Care Act 2024 (Cth) and the rules made under it.
Cookie	Cookies are data files used to estimate visitor numbers and to analyse overall traffic patterns on our websites. Most web browsers accept cookies by default.
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.

Term	Meaning
Eligible Data Breach	means 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.
Health Information	means information or an opinion about: • the health, including an illness, disability or injury, (at any time) of an individual; or • an 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; • 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; as defined in section 6FA of the Privacy Act.
Health Service	means activity that is intended or claimed (expressly or otherwise) by the individual or the person performing it: • to assess, maintain or improve the individual's health; or • where the individual's health cannot be maintained or improved, to manage the individual's health; or

Term	Meaning
	• to diagnose the individual's illness, disability or injury; or • to treat the individual's illness, disability or injury or suspected illness, disability or injury; or • to record the individual's health for the purposes of assessing, maintaining, improving or managing the individual's health; as defined in section 6FB of the Privacy Act.
OAIC	means the Office of the Australian Information Commissioner.
Online Platforms	means the online platforms we operate and any of our other websites or social media pages (including Facebook, Instagram and LinkedIn) managed by us.
Personal Information	is defined in the Privacy Act and the Aged Care 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. Information may still be classified as Personal Information for a period after death.
Privacy Act	means the Privacy Act 1988 (Cth).
Sensitive Information	is a subset of Personal Information that is afforded higher levels of protection under the Privacy Act. As we provide Health Services, all information we collect in providing, or to provide, such services are classified as Health Information and is therefore Sensitive Information.

Term	Meaning
	It means information or an opinion about an individual: • racial or ethnic origin; or • political opinions; or • membership of a political association; or • religious beliefs or affiliations; or • philosophical beliefs; or • membership of a professional or trade association; or • membership of a trade union; or • sexual orientation or practices; or • criminal record; • that is also personal information; or • health information about an individual; or • genetic information about an individual that is not otherwise health information; or • biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or • biometric templates.
Supporter	of an individual, means an individual registered as a supporter of the individual under section 37 of the Aged Care Act.