

## Purpose

Continuum Care is committed to ensuring that each person's right to privacy, dignity and confidentiality is recognised and respected, and that personal information is managed in accordance with the *Privacy Act 1988* (Commonwealth), and in particular, the Australian Privacy Principles.

Protecting your privacy is of utmost importance to Continuum Care and, as a Company entrusted with your information, we are committed to maintaining the security of Personal Information provided to us by persons who use this Website and register to become Members

This privacy policy explains how Continuum Care handles your personal information, and the ways in which it can collect and store personal information it holds about you.

The Privacy Act (and this Privacy Policy) does not apply to personal information contained in employee records held by us where the collection, use or disclosure of such information is directly related to a current or former employment relationship between Continuum Care and an employee. It does apply to Support Specialists, Customers and Visitors.

## Definitions

- **Consent** refers to permission for something to happen or agreement to do something.
- **Personal information** means information about a person whose identity is apparent or can reasonably be ascertained from the information.
- **Sensitive information** refers to a type of personal information which includes details of an individual's racial or ethnic origin, religious or philosophical beliefs, employment record, religious beliefs, criminal record or health/medical information and/or other personal information that is 'sensitive information' as defined in the Privacy Act.
- **Support Specialist** refers to an independent contractor who is registered with Continuum Care.
- **Customer** refers to a person who is registered with Continuum Care to obtain services from a Support Specialist.
- **Continuum Care** means Continuum Care Australia Pty Ltd,

## Consent

When accessing the Continuum Care website and/or submitting your personal information to Continuum Care through any means, you are consenting to information being used as set out in this Policy. If you do not agree with any term of this Policy, you are requested to not use Continuum Care services or website.

## Collecting personal information

Personal information is held about the Support Specialists and Customers, shareholders and employees, and may be held about independent contractors and other individuals who come in contact with



# PRIVACY POLICY

Policy No: OP\_PP\_002

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Continuum Care.

The Privacy Act 1988 regulates how personal information is handled and defines personal information as; *"...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"*.

Common examples are an individual's name, signature, address, telephone number, date of birth, medical records, bank account details and commentary or opinion about a person.

Personal information is collected directly by way of the website, other documents submitted to Continuum Care, correspondence provided by you as well as any phone calls and meetings.

Where Continuum Care take photographs, it will seek consent for use in publications, on our website or where it may occur in some other form.

If you choose to contact Continuum Care by e-mail using a message or contact link, it will record your e-mail address for the purpose of responding to your query or request.

## **Purpose of collecting personal information**

Continuum Care will collect your personal information when you are a website visitor or registered as a Support Specialist or Customer directly by way of the website, forms and other documents made available to us by you, correspondence you provide to us and telephone calls and meetings with you.

Continuum Care collects personal information about individuals it deals with by lawful and fair means, and only do so to the extent needed to carry out its associated functions and activities.

Continuum Care will only use sensitive information for the purposes listed below unless otherwise permitted or required by law or unless we obtain your consent.

Personal information is collected, held, used and disclosed so that the Continuum Care can:

- to facilitate the creation of and secure Your Account on our network;
- to identify you as a User in our system;
- to run a background check;
- to verify any information, you provide to us in your membership application;
- to send you a welcome e-mail to verify ownership of the e-mail address provided when Your Account was created;
- to provide you with a secure Continuum Care email address;
- to send you administrative e-mail notifications and respond to your inquiries or requests;
- to send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes;
- interact with you and provide you with services;
- interact with those who may provide you with Support Specialist services;
- determine the suitability of potential and existing Support Specialists and Customers, and persons who may interact with Customers and Support Specialists from time to time;
- provide information and updates about Continuum Care's services and activities including promotion and marketing activities;
- to collect and/or distribute money and manage the payment and recovery of amounts payable;
- to verify your compliance with your obligations in our User Agreement;
- maintain business records and otherwise manage the business;
- as required or permitted by law and to satisfy a duty of care;
- as disclosed to you and to which you have consented, and

- as you would otherwise reasonably expect.

Continuum Care may also collect sensitive information about you, including without limitation details of your health/medical history, race or ethnic origin, religion, nationality and in some cases, details of any criminal record you may have.

Continuum Care will provide personal details of Support Specialists and Employees to our insurers as required to provide a suite of insurance covers when providing services arranged and invoiced through Continuum Care.

The Privacy Act classifies certain information relating to services supplied on terms which allow payment to be deferred for a period of more than 7 days after the services are supplied as 'credit information'. Continuum Care may collect and hold credit information about you, where Continuum Care directly provides services or services are provided to you, and allow payment to be deferred for more than 7 days after supply.

- Occasionally, it may collect personal information about you from third parties. For example, personal information from your representatives, agent, guardian or caregiver (and vice versa).

## Disclosure of personal information

Continuum Care may only use and disclose your personal information for the purpose stated in this policy, except as otherwise communicated to you at the time the information is collected and updated.

Continuum Care may disclose personal information about you to the following types of entities if required in connection with the products and services listed above:

- Support Specialists who are registered with Continuum Care;
- your representatives, agent, guardian or caregiver;
- any industry body, tribunal, court or otherwise in connection with any complaint made by you about us;
- your referees (if you have provided us with referees to assist our background check, the assessment of a potential contract between you and us or for any other purpose);
- professional advisors, including accountants and lawyers;
- insurers, financial institutions, debt collection agencies, etc.; and
- government, regulatory and law enforcement authorities.

Continuum Care will disclose credit card payment information including:

- cardholder name;
- credit card number;
- expiry; and
- verification code

to our financial payment provider either Bendigo and Adelaide Bank Limited (ABN 11 068 049 178) or PayPal Australia (ABN 93 111 195 389) for the purposes of processing payments.

Continuum Care will not disclose your credit-related information to entities such as other credit providers or credit reporting bodies without your consent and will not disclose your personal information to persons or entities located overseas.

- The personal information you provide to Continuum Care may reveal or allow others to identify

aspects of your life. By providing personal information to Continuum Care when you create or update your details, you are expressly and voluntarily accepting the terms and conditions of the Support Specialist or Customer Agreement.

### **Third Party Service Providers.**

We may share your Personal Information with third party service providers to:

- to facilitate creation of accounts;
- to provide you with the Services that we offer you through our Site; and
- to conduct quality assurance testing and/or provide technical support.

These third party service providers are required not to use your Personal Information other than to provide the services requested by Continuum Care. Examples of such third party service providers include: companies that administer background checks of Support Specialists, Our insurer, Our banking facilities that process payments from both Support Specialists and Customers. These third party service providers are legally required not to use your Personal Information other than to provide the services requested by Continuum Care.

### **Holding/storing information**

Continuum Care holds personal information in paper form and electronic form. It has steps to protect the information it holds from misuse, interference and loss and from unauthorised access, modification or disclosure.

Electronic information and paper based information is stored securely by Continuum Care. Directors and employees are obliged to treat all personal information confidentially.

Continuum Care seeks to ensure that all personal information it holds is protected from misuse, interference, loss, unauthorised access, modification or disclosure.

There is no intention by Continuum Care to gather information about any person under the age of 18 years.

### **Accessing and Correcting your Personal Information**

Continuum Care endeavours to ensure that personal information that is collected, held, used and disclosed is accurate, complete, relevant, up-to-date and not misleading. Hence, you are encouraged to notify Continuum Care if you believe that any information about you requires alteration.

You may contact Continuum to request access to the personal information held about you (see contact details at the end of this policy).

We may require you to verify your identity and specify what information you require.

Where access cannot be given immediately, it aims to respond to your request within 30 days. If Continuum Care refuses access, it will provide you with a written notice stating the reason for refusing access. Continuum Care may seek to recover reasonable costs from you incurred for providing you with access to any of the personal information held by it.

If you make a request for copies of your personal information Continuum will endeavour to provide you

with such personal information as soon as reasonably practicable. We may decline access to personal information including where the release of the requested information would have an unreasonable impact on the privacy of others.

Continuum Care assumes that any personal information provided by you is free from errors and omissions.

You may request that personal information is varied or updated. Where changes to information are disputed the matter will be managed by the Managing Director of Continuum Care Australia Pty Ltd.

## Communication

Continuum Care may use your personal information to provide you with information and updates about its services, including via post, email, SMS and phone. If you do not wish to receive these types, please contact us (see contact details shown at the end of this policy).

## Cookies

A cookie is a data file that a website places on your computer. This enables the website to track the pages you have visited. A cookie only contains information that you supply and it cannot read data on your computer. Continuum Care website uses cookies. You can choose to set your browser to refuse cookies, however, this may mean that full advantage of the website may not occur.

## Changes to Personal Information

You may update, change or clear any Personal Information or other information we hold in Your Account by editing your Profile, in the [Profile](#) area of the Site.

## Deletion of Personal Information

You may request deletion of your Personal Information by us. Where Continuum Care is no longer required to maintain Personal Information for any purpose and the information is not otherwise required to be kept under an Australian law or court order, we will take reasonable steps to destroy or permanently de-identify the information.

In the situation where Continuum Care is required to keep this information and not delete it, or to keep information for a certain period of time, we will act to fulfil your request for deletion only after our legal obligations have been met.

When we delete any information, it will be deleted from the active database, but may remain in our archives.

We may retain your information for fraud or similar purposes if this is permitted pursuant to an Australian law or court order.

It should be noted that Continuum Care cannot influence deletion or modification of any Personal Information that we have already disclosed to third parties, as part of establishing Your Account or information that was in providing a service to our Members. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable.



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Policy No: OP\_PP\_002


## Variation to Policy

Continuum Care may vary the terms of this Privacy Policy from time to time to take account of new laws and technology, changes to its functions and activities and to make sure it remains appropriate.

## Questions and Complaints

If you have any questions in relation to this Privacy Policy or if you have a complaint about the way in which Continuum Care has handled your information, please contact Continuum Care by one of the following means:

Landline: (08) 8251 1924  
E-mail: [kbronson@continuumcare.com.au](mailto:kbronson@continuumcare.com.au)  
Post to: Managing Director  
Continuum Care Australia Pty Ltd,  
PO Box 1415, Golden Grove Village, SA 5125.

Policy Naming	Date Endorsed	Next Review	Signed approval of Managing Director
Policy No: OP_PP_002 Privacy Policy	09/02/2016	09/02/2017	 Kym Bronson