



Privacy Policy

Effective Date: July 24, 2025

Wholesome Home Group Pty Ltd (ACN/ABN: 687 964 932/14 687 964 932) is committed to protecting the privacy and confidentiality of the personal information we collect, use, store, and disclose. This Privacy Policy outlines how we manage personal information in accordance with the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) and other relevant Australian privacy laws, including those applicable to aged care and disability services.

By using our website, services, or providing your personal information to us, you agree to the terms of this Privacy Policy.

1. What is Personal Information?

Personal information is information or an 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 a material form or not.

Sensitive Information is a subset of personal information and includes information or an opinion about an individual's:

- Racial or ethnic origin
- Political opinions
- Membership of a political association
- Religious beliefs or affiliations
- Philosophical beliefs
- Membership of a professional or trade association
- Membership of a trade union
- Sexual orientation or practices
- Criminal record
- Health information (e.g., medical history, disabilities, health services received)
- Genetic information
- Biometric information used for verification or identification
- Biometric templates

Given the nature of our services, we primarily collect **health information** and other sensitive information, which is subject to higher privacy protection.

2. Kinds of Personal Information We Collect

We collect personal information that is reasonably necessary for us to provide our aged and disability home care services and to operate our business functions. The types of personal information we may collect include:

For Clients/Participants:

- **Identifying Information:** Name, date of birth, gender, marital status.
- **Contact Details:** Address, email address, phone numbers.
- **Health and Medical Information (Sensitive Information):** Medical history, diagnoses, medications, allergies, disabilities, care plans, reports from medical practitioners and allied health professionals, physical and mental health status, functional abilities, and support needs.
- **Financial Information:** Payment details, Medicare/NDIS details, funding arrangements (e.g., NDIS plan information, aged care subsidy details).
- **Next of Kin/Emergency Contact Details:** Names, relationships, contact information.
- **Lifestyle Information:** Preferences, interests, cultural background, dietary requirements.
- **Government Identifiers:** Medicare number, NDIS participant number (we do not use these as our primary identifier).
- **Other relevant information:** Power of attorney, guardianship orders, photographs (with consent).

For Employees, Contractors, and Volunteers:

- **Identifying Information:** Name, date of birth, gender.
- **Contact Details:** Address, email address, phone numbers.
- **Employment Details:** Resume, qualifications, professional memberships, work history, references, police checks, working with children checks, immunisation records.
- **Financial Information:** Bank details, superannuation details, tax file number.
- **Emergency Contact Details:** Names, relationships, contact information.
- **Health Information:** Relevant health information for employment purposes (e.g., fitness for work, injury management).

For Visitors to our Website:

- **Usage Data:** IP address, browser type, operating system, pages visited, time spent on pages, referring URLs. This information is generally de-identified but may be linked to you if you provide personal information through the website.

3. How We Collect Personal Information

We collect personal information in various ways, primarily directly from you where it is reasonable and practicable to do so. This may include:

- **Directly from you:** When you enquire about our services, complete forms (online or physical), during assessments, over the phone, via email, or in person.
- **From your authorised representative:** With your consent, we may collect information from your family members, guardians, or other authorised persons.

- **From third parties:** With your consent or where permitted by law, we may collect information from:
 - Medical practitioners, hospitals, and allied health professionals.
 - Government agencies (e.g., My Aged Care, NDIS Commission, Services Australia).
 - Other healthcare providers involved in your care.
 - Referrals from other organisations.
 - Recruitment agencies or nominated referees (for employment purposes).

We will take reasonable steps to ensure you are aware of the purposes for which the information is collected, the organisations to which we may disclose the information, and the consequences if the information is not collected.

4. Purposes for Collecting, Holding, Using, and Disclosing Personal Information

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

- **Providing Aged and Disability Home Care Services:** To assess your needs, develop and deliver tailored care plans, provide personal care, domestic assistance, nursing services, transport, and other agreed-upon supports.
- **Managing Your Care:** To coordinate care with other healthcare providers, monitor your health and well-being, and ensure continuity of care.
- **Communication:** To communicate with you, your authorised representatives, and other relevant parties regarding your care and our services.
- **Administration and Operations:** For internal record-keeping, billing, invoicing, managing payments, quality improvement, staff training, and compliance with our legal obligations.
- **Employment and Recruitment:** To process job applications, manage employee records, and assess suitability for roles.
- **Legal and Regulatory Compliance:** To meet our obligations under Australian laws, including the Privacy Act 1988 (Cth), Aged Care Act 1997 (Cth), National Disability Insurance Scheme Act 2013 (Cth), and other relevant legislation. This includes reporting to government agencies as required.
- **Responding to Enquiries and Complaints:** To address your questions, feedback, or concerns.
- **Marketing:** To provide you with information about our services that may be of interest to you (you may opt-out of marketing communications at any time). We will only use or disclose sensitive information for marketing with your express consent.

Sensitive Information (including health information) will only be used or disclosed for the primary purpose for which it was collected, for a directly related secondary purpose that you would reasonably expect, or with your express consent, or where required or permitted by law (e.g., in a permitted general or health situation to prevent or lessen a serious threat to life, health, or safety).

5. Disclosure of Personal Information

We may disclose your personal information to third parties in the course of providing our services or operating our business. These may include:

- **Your authorised representatives:** Family members, guardians, or advocates, with your consent.
- **Healthcare professionals:** Doctors, nurses, allied health professionals (e.g., physiotherapists, occupational therapists) involved in your care.
- **Other service providers:** Where necessary for the provision of integrated care (e.g., transport providers, equipment suppliers).
- **Government agencies:** My Aged Care, NDIS Commission, Services Australia, Department of Health, and other regulatory bodies, as required or authorised by law.
- **Our contractors and service providers:** IT system providers, data storage providers, payment processors, and other third parties who assist us in our operations, provided they are bound by confidentiality and privacy obligations.
- **Legal and professional advisors:** Lawyers, accountants, auditors, insurers.
- **Emergency services:** In situations where there is a serious threat to life, health, or safety.

We will take reasonable steps to ensure that third parties to whom we disclose personal information are also committed to protecting your privacy or are subject to comparable privacy obligations.

Overseas Disclosure: Wholesome Home Group Pty Ltd is unlikely to disclose personal information to overseas recipients. If we ever need to disclose your information to an overseas recipient, we will obtain your consent and comply with APP 8 (Cross-border disclosure of personal information).

6. How We Hold and Protect Personal Information

We store personal information in various formats, including electronic databases, hard copy files, and secure cloud storage facilities. We take reasonable steps to protect the personal information we hold from misuse, interference, and loss, as well as from unauthorised access, modification, or disclosure. These steps include:

- **Physical Security:** Securing our premises, restricting access to hard copy files and sensitive documents.
- **Computer and Network Security:** Implementing firewalls, password protection, encryption, secure servers, and regular security audits.
- **Access Control:** Restricting access to personal information to authorised employees, contractors, and volunteers on a "need-to-know" basis.
- **Staff Training:** Providing ongoing training to our staff on privacy obligations and secure information handling practices.
- **Data Minimisation:** Collecting only the personal information that is necessary for our functions and activities.
- **Secure Destruction/De-identification:** Taking reasonable steps to destroy or de-identify personal information when it is no longer needed for the purpose for which it was collected, unless required or authorised by law to retain it.

7. Accessing and Correcting Your Personal Information

You have a right to request access to the personal information we hold about you and to request that it be corrected if you believe it is inaccurate, incomplete, or out of date.

How to Request Access or Correction: Please contact our Privacy Officer (details below) in writing. We will respond to your request within a reasonable time, usually within 30 days.

Access: We will provide you with access to your personal information unless an exception under the Privacy Act 1988 applies (e.g., if providing access would pose a serious threat to the life, health, or safety of an individual, or would have an unreasonable impact on the privacy of other individuals). If we refuse access, we will provide written reasons for our decision.

Correction: If we are satisfied that the personal information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, we will take reasonable steps to correct it. If we do not agree to correct your personal information, you may request that we associate a statement with the information that you believe it to be inaccurate, incomplete, or out of date.

No fee applies for requesting access to or correction of your personal information.

8. Anonymity and Pseudonymity

Wherever it is lawful and practicable, you have the option of not identifying yourself, or of using a pseudonym, when dealing with us. However, for us to provide quality aged and disability home care services, it is generally impractical for us to do so, as we require accurate personal and health information to ensure your safety and provide appropriate care.

9. Complaints About a Breach of Privacy

If you believe that we have breached the Australian Privacy Principles or mishandled your personal information, you have the right to make a complaint.

How to Make a Complaint: Please contact our Privacy Officer (details below) in writing, outlining the nature of your complaint.

Handling Your Complaint: We will acknowledge receipt of your complaint promptly and will investigate it thoroughly. We will endeavour to resolve your complaint in a fair and timely manner, usually within 30 days. We may ask you for further information to assist with our investigation.

If You Are Not Satisfied: If you are not satisfied with our response to your complaint, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC).

- **Online:** www.oaic.gov.au
- **Phone:** 1300 363 992
- **Mail:** GPO Box 5218, Sydney NSW 2001

10. Website and Cookies

When you visit our website, we may collect information using "cookies." Cookies are small files stored on your computer's hard drive that help us improve your website experience and analyse website traffic. This information is typically aggregated and anonymous. You can usually modify your browser settings to decline cookies if you prefer. However, this may prevent you from taking full advantage of the website.

Our website may contain links to other websites. We are not responsible for the privacy practices of these linked websites and encourage you to read their privacy policies.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. Any updated Privacy Policy will be posted on our website, and we encourage you to review it periodically. Your continued use of our services or website after any changes indicates your acceptance of the updated Privacy Policy.

12. Contact Us

If you have any questions about this Privacy Policy or our privacy practices, please contact our Privacy Officer:

Privacy Officer: Lea Nguyen-Sang

Email: lea@wholesomehomeservices.com.au

Phone: 0426 481 234

Postal Address: 68A Brushwood Drive, Alfords Point NSW 2234

Website: <https://www.wholesomehomeservices.com.au/>