

PRIVACY POLICY

Purpose

We, Arvida Group Limited and the other members of the Arvida group including Good Friends Limited (together *Arvida* or *we, us, our*), take our obligations regarding personal information seriously.

Personal information is information about an individual who can be identified.

We have adopted this Privacy Policy to enable us to collect, store and use personal information about our prospective, current and past residents, Good Friends members, employees, contractors, suppliers, investors and others, in accordance with relevant laws.

These laws include the Privacy Act 2020 (the *Act*) and, where relevant, the Health Information Privacy Code 2020 (the *Code*).

As someone who deals with us and provides us with personal information, you agree to be bound by this policy.

What information do we collect?

The information we collect

In order to provide the best service we can, we collect a range of information from different people. We may collect and hold personal information about:

- current, prospective and former residents (and their families and other authorised representatives)
- current, prospective and former Good Friends members
- suppliers (and their employees and contractors)
- current and prospective Arvida employees and contractors
- investors and prospective investors
- other people who deal with us from time to time.

Residents/prospective residents

If you are a current or prospective resident at one of our villages or care centres, we may collect:

- identifying information about you, such as your name, address and contact details
- name and contact details for family members, attorneys, next of kin, emergency contacts and other people who act on your behalf (as well as enduring powers of attorney)
- payment details and other financial information
- your health and medical information (such as your medical history, care needs, condition and treatment plan, your National Health Index (NHI) number and contact details for your medical practitioners and treatment providers)
- your IRD number, tax status and citizenship/residency details
- information about you and your living requirements

- CCTV footage (for safety and security purposes)
- information you provide to help us assist you with the application process
- other information relating to your use of our products and services

Good Friends members

If you are a current or prospective member of Good Friends, we may collect:

- identifying information about you, such as your name, address and contact details
- name and contact details for family members, attorneys, next of kin, emergency contacts and other people who act on your behalf (as well as enduring powers of attorney)
- payment details and other financial information
- your health and medical information (such as your medical history, care needs, condition and treatment plan, your National Health Index (NHI) number and contact details for your medical practitioners and treatment providers)
- information on your background, tastes and preferences in daily activities
- information about you and your living requirements
- CCTV footage (for safety and security purposes)
- information you provide to help us assist you with the application process
- information provided by your family and authorised representatives involved in your support and care
- other information relating to your use of our products and services that may include collecting personal information from time to time such as name, email address, and/or phone number when you fill out a survey that helps us improve our services

Employees/contractors/suppliers

If you are a current or prospective Arvida employee, contractor or supplier, we may collect:

- information about your occupation, educational qualifications, employment history and suitability for the role or relationship, including information provided during an employment application (such as your criminal history)
- employees' banking, tax and superannuation details
- name and details of emergency contacts
- contact details and any personal information provided when you commence a business or service relationship with us
- information about your performance in the role or relationship, including results of drug testing (if applicable)
- for Good Friends helpers, the type of care you are looking to provide, schedule, location, hourly rate, number of children, ages, narrative job description, requirements for a helper (such as ability to drive)
- pictures you choose to provide

We may also collect GPS data relating to your location while you are performing your role as an employee or contractor. However, you will clearly be advised in writing if we collect GPS data relating to your location at any time.

Investors

If you are a current or prospective Arvida investor, we may collect:

- name and contact details
- information you provide to help assist you with the application process
- transactional and financial information relating to your investment

Other

We may collect other personal information from time to time. We will only collect information where needed for us to deliver our products or services or where required by law.

The personal information that we collect from you is held in accordance with the Act (in particular, the Privacy Principles contained in the Act) and the Code where relevant.

Providing the above information is optional for you. However, if you do not provide this information to us, we may not be able to provide products and services to you or the service you receive may not be as appropriate or relevant as it could be.

How do we collect your information?

We may collect the personal information you provide us in a variety of ways. We will generally collect personal information from you directly, including through the following means:

- when you first apply to become a resident, member, employee, contractor or investor, or otherwise commence a business or service relationship with us
- while providing any of our products or services to you
- from website registration or contact forms, investor application forms and credit application forms
- during your interactions and correspondence with us
- when your health status is assessed
- when you use our website
- through CCTV cameras that may be situated in our villages or care centres or vehicles
- through GPS-enabled devices (but only where you have been advised of this as part of our terms of service or your employment – see above)
- while conducting resident satisfaction and customer research surveys
- through promotions

We may also collect your personal information from third parties where you have authorised this, this is permitted by law, or where the information is publicly available. This may include information from:

- your representative, or any person you have authorised to act on your behalf
- medical professionals or health and disability service providers who are involved in your care – with your consent

- health insurers
- suppliers of services to us (e.g. recruitment firms)
- government agencies such as a District Health Board (*DHB*), the Accident Compensation Corporation (*ACC*) and the Ministry of Health (*MoH*) – with your consent

We may store the above information for possible future communications.

If you have provided us with information about another person, you must have that person's permission to do so. As part of this you need to comply with your obligations under the Act and the Code. For example, you may need to tell that other person that you have done so, that they have a right to access their information and that we will handle their personal information in accordance with this policy.

How do we use your information?

We may use the personal information we collect from you for a number of purposes connected with our business. These include the following.

General

In general we may use your personal information:

- to verify your identity and application details
- to supply or provide you with any products or services you have requested, including healthcare services
- to administer your account (including credit checks, processing, administering and collecting payments from or making payments to you)
- to interact and communicate with you
- to engage third parties on your behalf (where authorised)
- to deal with your requests, enquiries or complaints and other resident care or business related activities
- to improve our products and services
- to contact you about our products or other initiatives we think you might be interested in
- for marketing, publicity or market research that we might undertake
- to comply with our legal obligations, including our reporting obligations
- for other purposes for which you have given permission or which is allowed by law.

Residents

If you are a current or prospective resident at one of our villages or care centres, we may use your personal information:

- to assist you to apply to live in one of our villages or care centres
- to assess your requirements, needs, health status and how we can care for you
- to provide you with, or facilitate the provision of, treatment or care
- to maintain and administer your record, including your clinical record

- to liaise with a DHB or MoH so we can comply with our obligations to them (including in connection with any audit of the village or care centre)
- to liaise with a Needs Assessment Coordination Service (NASC) where you undergo a needs assessment
- to provide health information about you (including your authorised representative's contact details) where requested to do so under the Act or the Code
- to monitor progress of your application for a government subsidy and to supply information on the subsidy
- to contract with your authorised representatives
- to manage and maintain our villages and care centres.

Good Friends members

If you are a current or prospective Member of Good Friends, we may use your personal information:

- to assist you to apply to receive care and support in your home
- to assess your requirements, needs, health status and how we can care for you
- to provide you with, or facilitate the provision of, support or treatment or care
- to maintain and administer your record, including your clinical or wellness record
- to liaise with a DHB or MoH or other trusted health partners
- to liaise with a Needs Assessment Coordination Service (NASC) where you undergo a needs assessment
- to provide health information about you (including your authorised representative's contact details) where requested to do so under the Act or the Code
- to monitor progress of your application for a government subsidy and to supply information on the subsidy
- to contract with your authorised representatives.

Employees/contractors/suppliers

If you are a current or prospective employee, contractor or supplier, we may use your personal information:

- to assess your suitability or performance
- to manage and meet obligations in relation to our employees and contractors
- to purchase products or services
- to perform drug and alcohol searching and testing, in accordance with our relevant policies

Investors

If you are a current or prospective Arvida investor, we may use your personal information:

- to process your application to become an investor
- to enable your investment in Arvida
- as otherwise required or allowed by law.

Other

We may use CCTV footage, if required, for detecting and deterring inappropriate or criminal behaviour at our villages and care centres, and monitoring the safety and security of our residents, members, staff and property.

We may also use your information in an anonymised aggregated form, to carry out analysis of our products and services and interactions with residents, members and staff.

Disclosure of your information

We want you to know that any information you supply to us may be shared with and used by the following, where relevant to them:

- our employees, contractors, suppliers and agents
- your authorised representative or any person acting on your behalf
- a DHB or the MoH, so we can fulfil our obligations to them
- a NASC, where you undergo a needs assessment
- other government and regulatory authorities, where required or allowed by law
- medical professionals and health and disability service providers involved in your treatment or care
- third party health benefit providers and insurance companies, so we can assist in your claim for reimbursement/payment of the cost of your treatment or care
- other third parties who help provide products and services (or audit these)
- our advisors
- a business that supports our services and products (e.g. a business that hosts or maintains our IT system, data centre or website)
- credit risk assessment agencies and debt collection agencies
- any court, tribunal or regulatory authority where disclosure is required or allowed by law
- any other person authorised by you or by law.

We will not share your information with third parties, except as outlined in this policy, or where you have authorised that disclosure.

In the event we sell any village, village operator or other business or entity within the Arvida group, personal information relating to current and prospective residents, members, customers, employees, contractors, suppliers and other persons who deal with that village, business or entity will be transferred to the purchaser of the village, village operator, business or entity.

Your information may be hosted with a third party service provider. Our agreements with them prohibit the information that we collect from you being used by them in a way that we have not authorised.

We may be required by law to disclose information relating to your shareholding in Arvida, e.g. where someone requests our share register.

Transfer of personal information outside New Zealand

We may from time to time transfer personal information to third parties outlined above who are located outside New Zealand. If we do so, we will take reasonable steps to ensure your personal information will be protected by comparable safeguards to those in New Zealand law. If your personal information will not be protected by comparable safeguards to those in New Zealand law, we will tell you this is the case, and only transfer your personal information with your consent.

Storage and protection of your information

We may record and store personal information we collect from you. We take reasonable steps so that your personal information is stored securely and is protected from misuse, loss and unauthorised access, modification or disclosure.

If a privacy breach occurs which has caused or may cause serious harm to you, we will notify you of this as soon as practicable either directly or, if that is not reasonably practicable, by public notice.

We may store your personal information using a third party service provider (including providers outside New Zealand) and so your personal information may be held outside New Zealand. These providers are typically specialists in the areas of data storage, hosting and protection and are therefore well-placed to maintain systems that protect your information.

We keep personal information only for as long as it is needed and will take reasonable steps to securely destroy or delete personal information where it is no longer required. Personal information may continue to be stored in a backup computer system and we may be required by law to retain certain personal information.

Your right to access and correct your information

We take reasonable steps to keep your personal information accurate, complete and up-to-date.

Aside from some circumstances set out in the Act and the Code, you have a right to access and correct the personal information we hold about you. To do this, please email our Privacy Officer at info@arvida.co.nz or info@goodfriends.co.nz.

In some cases, there may be a charge associated with providing copies of your personal information to you. If so, we will let you know before sending your information to you.

Internet use and cookies

Cookies

A cookie is a small file that resides on your computer and can be used by a website to remember things like your preferences for that site. For example, a cookie can be used to store registration information so that you do not need to re-enter that information on a subsequent visit to the site. We may send cookies to your computer while you are accessing our website.

We do not use cookies to collect any personal information about you, although we may collect non-attributed (anonymous) information regarding your use of our website.

Some web browsers enable you to decline the receipt of cookies. If you use this function you will still be able to visit our website but some pages may not fully function and you may not be able to access certain information on the website.

Statistical information and analytics

To improve our website and products and services, we may collect statistical information about your visit and use patterns and other meaningful information gathered from website analytics tools. This information is aggregated and doesn't identify you personally.

In addition, we may use third party cookies from third party services such as Google Analytics and/or Microsoft Application Insights. These services give us insight into behavioural information relating to users' interests in our services, on an anonymous and aggregate level. This helps us to understand browsing behaviour to give a better experience while using our services.

Links to third party sites

This Privacy Policy only relates to our website and services. Our site may contain links to other third party sites. We are not responsible for the privacy practices or the content of other websites. You should check their privacy policies before providing personal information to them or any other third party.

Breach of Privacy Policy

The Act provides the enforcement framework if there is a breach of this Privacy Policy.

Review of our Privacy Policy

This Policy has been approved by the Board and will be reviewed as required and at least every two years.