

1. Purpose

Radius Care Limited (*Radius*) takes our obligations regarding personal information seriously. This policy clarifies how Radius collects, stores, uses and gives access to personal information about our employees, contractors, residents, volunteers, suppliers, and other parties, 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*).

If you are someone who deals with us, and provides us with personal information, or who has access to personal information held by us, you agree to be bound by this policy.

2. Information Collected

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

- current, prospective and former residents, including their families and other authorised representatives;
- suppliers, including their employees and contractors;
- current, prospective and former employees and contractors;
- investors and prospective investors, and
- other parties who deal with us from time to time.

2.1. Residents/prospective residents

If you are a current or prospective resident at one of our facilities or villages, 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, including enduring powers of attorney;
- demographic information such as gender, date of birth, age, title, spoken language;
- payment details and other financial information;
- your health and medical information, including your medical history, ACC, vaccination status, COVID status, care needs, condition and treatment plan, 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, and
- other information relating to your use of our services.

2.2. Employees/contractors/suppliers

If you are a current or prospective Radius 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 a business or service relationship was commenced with us;
- information about your performance in the role or relationship, including results of drug testing (if applicable);
- health information relevant to your role, such as vaccination status;
- pictures you choose to provide, and
- police vetting results, as per government guidelines.

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

2.3. Investors

If you are a current or prospective Radius investor, consistent with legal and NZX requirements we may collect:

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

2.4. Other

From time to time, other personal information may be collected where this is needed for us to deliver our products or services, or where required by law.

Any personal information collected 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. However, if you do not provide this information, we may be unable to provide products and services to you or the service you receive may not be as appropriate or relevant as it could be.

3. How your information is collected

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

- when you first apply to become a resident, 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 websites;
- through CCTV cameras that may be situated in our facilities or villages or vehicles. (Note that CCTV may be used in public places, but will not be placed in private areas, such as

bedrooms, without consent of the resident/family);

- through GPS-enabled devices (but only where you have been advised of this as part of our terms of service or your employment – refer above);
- while conducting resident satisfaction and customer research surveys, and
- through promotions.

We may also collect your personal information from third parties where you have authorised this, as 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), and
- 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, and may need to comply with your obligations under the Act and the Code, (for example, informing the other person that you have done so, that they have a right to access their information, and that their personal information will be handled in accordance with this policy).

4. How 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:

4.1. General Use

- to verify your identity and application details;
- to supply or provide 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, and
- for other purposes for which you have given permission or which is allowed by law.

4.2. Residents

If you are a current or prospective resident at one of our facilities or villages, we may use your

personal information:

- to assist you to apply to live in one of our facilities or villages;
- 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 records, including your clinical records;
- to liaise with a DHB or MoH so we can comply with our obligations to them (including in connection with any audit of a facility or village);
- 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, and
- to manage and maintain our facilities and villages.

4.3. 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, contractors and suppliers;
- to purchase products or services, and
- to perform drug and alcohol searching and testing, in accordance with relevant Radius Care policies.

5. Accessing your own information

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

Aside from those 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 privacyofficer@radiuscare.co.nz.

In some circumstances, there may be a charge associated with providing copies of your personal information to you. If this is the case, we will let you know before sending your information to you.

5.1. Investors

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

- to process your application to become an investor;
- to enable your investment in Radius, and
- as otherwise required or allowed by law.

5.2. Other

If required, we may use CCTV footage for identifying and deterring inappropriate or criminal behaviour at our facilities and villages, and monitoring the safety and security of our residents, 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 and staff.

6. Disclosure of your information

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, to enable us to fulfil our obligations to them;
- a NASC, where you undergo a needs assessment;
- other government and regulatory authorities, where required or allowed by law (this includes Worksafe);
- 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 (for example, a business that hosts or maintains our IT system, data centre or websites);
- credit risk assessment agencies and debt collection agencies;
- any court, tribunal or regulatory authority where disclosure is required or allowed by law, and
- 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 facility, village, or other business or entity within the Radius group, personal information relating to current and prospective residents, customers, employees, contractors, suppliers and other persons who deal with that facility, village, business or entity will be transferred to the purchaser of the facility, village, village operator, business or entity.

Your information may be hosted with a third-party service provider, such as our software systems 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 Radius, for example, where someone requests our share register.

7. Holding personal information outside of New Zealand

If we are required to store or transfer information outside of New Zealand, we will ensure this information is protected in a consistent manner with New Zealand guidelines.

8. 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), therefore your personal information may be held outside New Zealand. These providers specialise in the areas of data storage, hosting and protection, and are experienced

in maintaining systems that protect your information.

We keep personal information only for as long as it is needed; we 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.

9. Internet use and cookies

The Radius Care shop may use cookies, but this is only collected to enhance the experience of our customers while browsing the shop. Any information that is collected would only be used in an anonymous manner and information will not be used to identify individual users.

9.1. Statistical information and analytics

To improve our websites 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 does not 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.

9.2. Links to third party sites

This Privacy Policy only relates to Radius websites 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. It is recommended you check their privacy policies before providing personal information to them or any other third party.

10. Where you can find further information

You can find further information about your privacy rights on the website of the Office of the Privacy Commissioner at www.privacy.org.nz

11. Review of our Privacy Policy

This Policy was approved by the Board in April 2022, and will be reviewed as required at least every two years.