

Hopper Living Privacy Policy

1. General

Hopper Living is a New Zealand company operating as a retirement village and aged care service provider. This privacy policy (**Policy**) outlines how we manage the personal information we hold about our residents, potential residents, staff, contractors, suppliers, and others.

We, us, our, and **Hopper Living** mean Maygrove Village Ltd, Country Club Huapai LP, The Anchorage LP and Maygrove Care Ltd and their subsidiaries. 'Personal information' is information about an identifiable individual (a natural person).

Hopper Living is bound by the Privacy Act 2020 (**Privacy Act**) and the Health Information Privacy Code 2020 (**Code**).

2. Acceptance of this Policy

By using our services or otherwise providing us with your personal information, you agree to be bound by this Policy.

3. Collection – How we collect information about you

Who we collect information about

We may collect and hold personal information about:

- current, potential, and former residents, and their families and other representatives.
- service providers, suppliers and their employees and contractors.
- current and prospective employees and contractors of Hopper Living, and their next-of-kin or emergency contacts.
- individuals we deal with while carrying on our business; and
- other people who come into contact with Hopper Living.

Information we collect.

We collect personal information to manage and conduct our business, to provide and market our services and to meet our legal obligations. Depending upon the nature of your relationship with Hopper Living, the type of personal information we collect, and hold may include:

General

- a) information as required for our relationship with you, such as:
 - your name, address, contact details, date of birth, and documents that verify your identity and other personal details.
 - your IRD number, tax status and citizenship or residency details.
 - diversity information, which might include gender, ethnicity, languages spoken, relationship status etc.

- your bank account details (for direct debits or payments, as applicable).
- any other information which assists us in conducting our business, providing and marketing our services and meeting our legal obligations.
- details of your religious beliefs or affiliations.
- your health and medical information, including medical history, condition and treatment plan, and contact details for your medical practitioners and treatment providers.
- information we create during our relationship with you, such as details or evaluations of your interactions with us.

For current or prospective residents

- b) information to help us assist you with the application process and to enable us to deliver the best support and service for your needs. This may include:
- details of your family medical history.
 - your NHI number and Veterans Affairs number (where applicable);
 - name and contact details for your family members, attorneys, next of kin, emergency contacts and others acting on your behalf. We may also collect copies of any relevant enduring powers of attorney.
 - any relevant details relating to your residence at our facilities (for instance, assessment of suitability to use certain facilities such as swimming pools).

For current or prospective staff members, contractors, or suppliers

- c) information for the purpose of commencing and conducting a business or employment relationship with you. This may include:
- information about your occupation, employment history, education and suitability for the role or relationship, including criminal history and social media profiles.
 - name and details of emergency contacts.
 - information about your performance in the role or relationship, including results of drug testing (if applicable).

Who we collect personal information from

We will generally collect personal information from you directly. However, we may also collect personal information:

- a) from you indirectly (including through the use of services and facilities available through our websites and social media channels).
- b) from current, potential and former residents, residents' families, service providers, suppliers and their employees and contractors, investors, employees, individuals we deal with in the course of carrying out our business and other people who come into contact with Hopper Living.
- c) from third parties in some instances, for example, we may use third parties to analyse traffic at our websites and social media channels, which may involve the use of cookies. In some circumstances we might collect personal information about an individual from a third party, for example, a report provided by a medical

professional or an employment reference from another person. Other third parties may include your health service providers, health insurers, government agencies, private and public hospitals, service providers we engage to manage our investors, recruitment and labour hire companies, and suppliers of services to us, or third parties where we have your consent to that collection.

- d) from CCTV cameras that may be placed on our premises, which includes our retirement villages and aged care facilities; and
- e) from publicly available websites.

If you have provided us with information about another person, you must have that person's permission to do so, and if applicable you must comply with your obligations under the Privacy Act and the Code (if applicable), for instance, 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.

4. Use – How we use and disclose information that we collect about you

In general, we collect, hold, use and disclose your personal information for the following purposes:

General

- to communicate with you.
- to conduct our business and help us manage and enhance our services.
- to provide and market our services to you.
- to process, administer, collect payments from or make payments to you, and if applicable, make appropriate taxation deductions.
- to ensure health and safety on our premises.
- to engage third parties on your behalf (where authorised);
- to provide joint marketing initiatives with other service providers.
- to perform data analysis.
- to perform market research.
- to identify, prevent or investigate any actual or suspected fraud, unlawful activity or threats to our systems or any person; and
- to comply with our legal obligations, including our reporting obligations.

For current or prospective residents

- to assist you to apply to live in a Hopper Living village or care centre.
- to assess your requirements, needs, health status and how we can best provide you with our services.
- to provide you with or facilitate the provision of healthcare services, treatments, or care.
- to conduct appropriate checks for creditworthiness.
- to maintain and administer your record, including (where relevant) your clinical record.

For current or prospective staff members, contractors, or suppliers

- to assess suitability or performance of potential or current employees, contractors, or suppliers.
- to manage and meet obligations in relation to our employees and contractors.
- to purchase goods or services; and
- to perform drug and alcohol searching and testing, in accordance with relevant Hopper Living policies.

In addition, CCTV footage specifically may be used for the following purposes:

- a) detecting and deterring criminal or inappropriate behaviour on our premises and at our retirement villages and aged care facilities.
- b) monitoring the safety and security of our staff, residents, contractors, and visitors, and completing incident investigations; and
- c) reviewing the actions of our staff or contractors.

All information collected by Hopper Living from any drug and/or alcohol testing or search will be kept confidential to the extent required by law, provided that relevant information may be disclosed to that individual's supervisor or manager.

5. Who we may disclose your personal information to

We may disclose your personal information:

- a) to you, or your attorneys or authorised representatives. If you are a prospective, current or former resident and you do not have an attorney or representative, we may also disclose your personal information to your family members or carers if we consider it necessary or desirable for the purposes of your care or wellbeing.
- b) to other members of Hopper Living.
- c) if you are a resident or staff member, to third party health providers where necessary for your treatment or insurance companies to assist with the processing of a claim in connection with treatment (this is done with your permission where appropriate).
- d) if you are a resident, to the DHB for the purposes of fulfilling our obligations under our contract with the DHB.
- e) to other third parties who provide services to or for Hopper Living or who act on our behalf.
- f) to courts, tribunals, and regulatory authorities.
- g) to anyone who assists us to identify, prevent or investigate any actual or suspected fraud, unlawful activity or threats to our systems or any person.
- h) to government agencies and our statutory supervisor (such as when making tax payments relating to you or when meeting reporting obligations, such as under financial markets legislation).

- i) to industry associations or other third parties, for benchmarking, statistical analysis, and reporting purposes (provided your information is first anonymized).
- j) if you are a staff member, to professional organisations which you are a member of, where necessary for any registration or assessment requirements.
- k) if you are a staff member, to any third parties who provide benefits or services to our staff.
- l) anyone else to whom you authorise us to disclose it; and
- m) where we are required or permitted to do so by law.

6. Security of your personal information

We take reasonable steps to protect personal information held by us from misuse and loss and from unauthorized access, modification, or disclosure, for example by use of physical security and restricted access to electronic records.

Where we no longer require your personal information, we will use reasonable endeavours to comply with our legal obligations in respect of that information.

7. Access, correction, and retention of your personal information

We endeavour to ensure that the personal information we hold is accurate, complete, and up to date. We encourage you to contact us to update any personal information we hold about you. Contact details are set out below. You have the right to correct any personal information we hold about you in accordance with the Privacy Act and the Code.

Subject to the exceptions set out in the Privacy Act and the Code, you may seek access to the personal information which we hold about you by contacting:

- if you are a current resident, your Village Manager; or
- in all other cases, our Head Office Privacy Officer on: ruth@hopperliving.co.nz

We will require you to verify your identity and to specify what information you require. A fee may be charged for providing access. If a fee is to be charged, we will advise you of the likely cost in advance.

8. Changes to this Policy

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. The most current version of this Policy is available at reception on our sites and can be obtained by contacting our Head Office Privacy Officer on ruth@hopperliving.co.nz

9. How to contact us and complaints

If you want to talk to us about privacy or your personal information or have a complaint about the way we have treated your personal information, please contact us and we will respond as soon as possible to resolve the issue. We also welcome any questions and comments you may have about our privacy practices.

You can contact us at:

Privacy Officer
Hopper Living
PO Box 110
Orewa 0946

ruth@hopperliving.co.nz
ph: 021 413 472

If you are not satisfied with our response, you can contact the Office of the Privacy Commissioner.