

**JAPARA**

**JAPARA HEALTHCARE LIMITED**

**ACN 168 631 052**

## **Privacy Policy**

**Approved by the Board of Japara Healthcare Limited  
4 April 2014**

# Japara Healthcare Limited

## Privacy Policy

The protection of individuals' privacy is essential to Japara's business. This document sets out our policy on the protection and handling of personal information about individuals.

### **Information collection**

We collect personal information about individuals in various circumstances, for example when they apply for shares in our company. The types of personal information we collect include current and historical information about your name, contact details, identification, organisation, employment, positions held, forms submitted, payment details, tax file number (optional) and enquiry/complaint details. We also collect personal information about your use of our products and services and your other dealings with us, including any contact we have with you by telephone, email or online. We collect personal information directly from you as well as from third parties including public sources, our related companies, your representatives (e.g. financial adviser), information service providers, our share registry and the parties with whom we exchange information as described here.

We are required and authorised to collect your personal information under various laws including the Income Tax Assessment Act and the Corporations Act. The Corporations Act requires us to include information about our shareholders (including name, address and details of the shares held) in our public register of members.

### **Information use and disclosure**

We may collect, hold, use and disclose personal information in order to process your applications and requests, service your needs (e.g. as a shareholder), provide facilities and services that you request, process payments and refunds, verify your identity and personal information, maintain and update our records, manage our relationship with you, protect our lawful interests and deal with enquiries and disputes and carry out appropriate administration.

Your personal information may also be used from time to time to inform you by email, phone and other means about other products and services offered by us, which we consider may be of interest to you. This may be on an ongoing basis, unless you opt out as described below.

Your personal information may also be exchanged with our related companies, agents and service providers. These parties may be located in Australia, and other countries. The types of agents and service providers that may be provided with your personal information and the circumstances in which your personal information may be shared are:

- our share registry for ongoing administration of the register of members;
- printers and other companies for the purpose of preparation and distribution of statements and for handling mail;
- market research companies for the purpose of analysing our shareholder base and for product development and planning; and
- legal and accounting firms, auditors, contractors, consultants and other advisers for the purpose of administering, and advising on, shares in our company and for associated actions.

The information contained in our register of members must remain there even if a person ceases to be a shareholder. Information contained in our register of members is also used to facilitate dividend payments and corporate communications (including financial results, annual reports and other information that we may wish to communicate to our shareholders) and compliance with legal and regulatory requirements.

**Information storage and security**

We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. We implement a range of measures to protect the security of that personal information. We are also required to take reasonable steps to destroy or de-identify personal information when no longer needed for any permitted purpose.

**Access, updating and further information**

Individuals have a right on request to gain access to, and updating of, the personal information that we hold about them, subject to certain exemptions under law.

A reasonable fee may be charged for access in accordance with applicable law. In the case of access and correction requests, please provide as much detail as you can about the particular information you seek, in order to help us locate it. We will provide our reasons if we deny any request for access to or correction of personal information. Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction with the information.

Access and updating requests and privacy complaints should be made by contacting us as set out below.

Attention: Privacy Officer

Email: [info@japara.com.au](mailto:info@japara.com.au)

Phone: (03) 9649 2100

We take your privacy concerns seriously. If you raise any concerns that we have breached your privacy, we will respond to let you know who will be handling your matter and when you can expect a further response.

Japara Healthcare Limited ABN 54 168 631 052