

Aruma Privacy Statement

Our privacy commitment

At Aruma Services Limited ABN 31 001 813 403 (Aruma) (together we, us, our and other similar expressions), we understand and respect the importance of your privacy. This Privacy Statement tells you how we collect, store, use and disclose your personal information as our commitment to safeguarding your personal information. We encourage you to read this policy carefully so that you understand how we deal with that information

We take all reasonable steps to ensure we are open and transparent about the way we manage your personal information. Aruma has a privacy policy and privacy procedures that set out our commitment to protecting personal information from misuse, loss, unauthorised access, modification, or disclosure.

We take our privacy obligations seriously and ensure we comply with the Privacy Act 1988 (Cth) (the Act), including the Australian Privacy Principles (APPs) and other relevant state and territory legislation.

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable. The personal information we may collect includes, but is not limited to:

Contact details	• Name • Address • Phone number • Email
Information about your family and other related persons, such as:	• Partner • Parents • Children • Dependents • Carers / nominee or authorised
Government identifiers:	• Medicare reference • Driving licence • Australian Passport
Biographical data:	• Date of Birth • Sex / Gender • Private health care insurance details
Employment or educations status	• Current • Historic
Finance details	• Bank details • Credit card details

With your written consent, we may also collect and handle sensitive information, this may include:

- Health and disability information
- Race or ethnicity origin
- Religious belief or affiliations
- Sexual orientation
- Criminal history
- Cultural and linguistic background (including languages you speak)

We may also obtain photos and video of you; we will only share these with your consent.

It is your choice if you provide Aruma with your personal and sensitive information. However, if you choose not to provide some or all of the personal information requested, we may not be able to offer or provide you with all Aruma services.

How we collect personal information

Aruma collects your personal information through our interactions with you, this can include written communication, electronic forms, online portal or through personal interactions such as face to face or telephone conversations. Aruma only collects personal information when it is reasonably necessary for, or directly related to our functions, activities and to provide services that meet your needs and expectations, or when required to do so by law.

We collect your personal information directly from you most of the time, however, on occasion, we may also request your personal data from others, including but not limited to, a parent or guardian, health professionals and/or service providers.

We collect your personal information when you:

- enquire about or use our services.
- contact us to make an enquiry or give us feedback.
- 'visit any of the websites we operate or use our digital services'
- talk to a member of our staff.

We may collect various types of information when you interact with any of our websites, including the Aruma, Aussie Biscuits, Summerland Farm, Aruma Manufacturing and Aruma Facilities Management sites. This includes gathering data about your interactions with the website, such as pages visited, duration of visit and types of devices used. This information helps us to enhance our website functions and user experience. We also use cookies and similar tracking technologies to personalise your experience, analyse trends and administer the website. You have the option to manage cookie preferences through your browser settings.

How we use personal information

We are careful about how we use personal information to deliver our services. We only use information for the primary purpose for which it was collected, other secondary purposes reasonably related to the primary purpose, or if otherwise permitted by laws or you provide your consent.

Without limiting the above, we use your personal information to:

Serve you as a customer	We use your information to deliver our services including to: • assess and process applications • manage existing services • communicate with you or your representatives.
Improve service delivery	We use your information to improve the products and services we provide through activities such as: • reviewing customer feedback • monitoring communication for quality assurance, training, and compliance purposes.
Manage our operations	We use your information to manage our operations including to: • deliver services • manage fees and customer payments • respond to feedback or complaints.
Manage security and risk	We use your information to: • reduce the risk of cyber-attacks, unauthorised access and other criminal or malicious activity • investigate health and safety incidents
Meet legal obligations	As authorised by law, we use your personal information to comply with any legal or regulatory obligations.
Perform analytics activities	We may analyse data to understand and improve the performance, user experience, and functionality of a service, website or application.
De-identify information	We may use deidentified information to provide internal insight and analytics.
Direct Marketing	We may use your personal information to send you marketing or operational surveys by post, email or telephone, we will provide you with an opportunity to opt-out of receiving such information. If at any time you no longer wish to receive any direct marketing communications from Aruma please contact our comms team by emailing comms@aruma.com.au

When we share or disclose personal information

We usually disclose the personal information we collect to our related entities, service providers and contractors, who help us supply our services. For example, we may disclose the personal information we collect to our information technology providers, providers of marketing and promotional services, professional advisers such as legal practitioners and accountants, and insurers.

Except as indicated above, Aruma will not share personal information with any third parties unless:

- the individual concerned has consented to the use or disclosure.
- the individual concerned would reasonably expect us to use or disclose their personal information because it relates to the primary purpose for which it was collected (or if it is sensitive information, that it is directly related).
- we are required or authorised by law to use or disclose the information.
- a permitted general situation exists—including where we reasonably believe that using or disclosing the information is necessary to:
 - Lessen or prevent a serious threat to the life, health or safety of any individual or to public health or safety
 - Take appropriate action in relation to suspected unlawful activity or serious misconduct
 - Establish, exercise, or defend a legal or equitable claim
- we reasonably believe the use or disclosure is necessary for our compliance or enforcement activities, or for the compliance or enforcement activities of other Commonwealth, state or territory agencies.
- the third party is our service provider or contractor; in which case we will require them to use and disclose the personal information only for the purpose for which it was provided to them.
- the third party is a person involved in a dealing or proposed dealing (including a sale or transfer) of all or part of our assets and business.

How you can access your personal information

You have the right to access the personal data we hold about you. If you wish to exercise these rights or have any questions about Aruma's privacy practices, please speak to a member of your support team or email privacy@aruma.com.au.

However, where:

- we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety.
- the access impacts on the privacy of others.
- the request for access is frivolous or vexatious.
- there are existing or anticipated legal proceedings; or

- the access can be denied under law or by a law enforcement agency, we may deny your request for access.
 - If we deny your request for access, we will let you know why.

How you can request a correction to your personal information

When you notify us, that information held about you is incorrect or incomplete, we will correct it where we agree with you, or evidence can be provided.

If, after careful review and consideration we do not consider that the information should be amended, we will not amend it, but we will include a note detailing your request.

Requests for correction of information should be made to the Privacy Officer via email privacy@aruma.com.au.

How we store and secure personal information

Aruma stores personal information in a variety of formats including but not limited to:

- Hard copy files
- Aruma issued electronic devices (laptop, iPad, mobile phone)
- Databases
- Third party storage providers such as cloud storage and archive facilities

Aruma takes reasonable steps to protect personal information against misuse, interference, and loss, as well as from unauthorised access, modification, or disclosure.

Access to personal information is limited to our employees who specifically need it to carry out their business responsibilities. We also maintain physical security procedures to manage and protect the use and storage of records containing personal information.

These steps may include:

- encryption.
- regular security assessments.
- access controls.
- ensuring access to buildings are secure.
- undertaking due diligence assessments when engaging third party service providers.
- ensure information we no longer require is appropriately destroyed, deleted or de-identification.

We are not responsible or liable for the security of data sent via the internet.

Cookies and Online Tracking Technologies

Microsoft and other service providers may process or store information outside Australia. Where we disclose personal information overseas, we take reasonable steps required by applicable privacy law to ensure that it is handled appropriately.

We use cookies and similar technologies to operate our websites and understand how they are used. Depending on your browser settings, these technologies may be used to collect information such as your IP address, device and browser information, pages viewed, links selected, visit duration and other interactions with our websites.

We use this information to:

- provide essential website functions
- remember your settings and preferences
- measure website traffic and performance
- identify and resolve usability issues
- improve our websites, services and communications
- support advertising and personalisation, where applicable.

We use analytics, personalisation and advertising cookies in accordance with applicable legal requirements. You can review or change your cookie and privacy preferences at any time through your browser settings. Changing your preferences will not affect any processing that occurred before the change.

We use Microsoft Clarity to help us understand how visitors interact with our websites through usage analytics, heatmaps and session recordings. Microsoft Clarity may collect information about website interactions, device and browser details, approximate location and IP address. The service is designed to limit the collection of personal information and mask content that should not be recorded.

How Aruma uses artificial intelligence (AI)

Aruma is exploring and investing in AI to improve the way we work and support the delivery of safe, high-quality services. AI tools can assist our employees with routine administrative activities, analysing information, improving administrative efficiency, preparing draft content and assisting with clinical documentation. These tools support, but do not replace professional judgement, empathy and accountability.

AI generated content may contain inaccuracies, omissions or biases. For this reason, appropriately trained employees and clinicians review AI generated outputs before they are relied upon or incorporated into records, communications or decision-making processes.

Aruma does not use AI systems to make fully automated decisions that have legal effects or similarly significant impacts on the people we support, employees or other individuals. Decisions affecting services, employment, safety, wellbeing or individual rights continue to involve human review and decision making.

Microsoft 365 Copilot

Aruma uses approved Microsoft 365 Copilot services to support workplace productivity. Examples include summarising internal documents, analysing information and assisting employees to prepare draft correspondence and reports. Copilot operates within Aruma's managed Microsoft 365 environment and is subject to Aruma's existing identity, access, security and information governance controls. Under Microsoft's enterprise service commitments, prompts, responses and organisational data accessed through Copilot are not used to train Microsoft's foundation AI models.

Employees remain responsible for checking Copilot generated material for accuracy, relevance, privacy and appropriateness before it is relied upon or shared.

Heidi AI

Where Heidi AI is used during a consultation, individuals will be informed of its use and may decline its use. Alternative documentation processes are available. Heidi captures and transcribes relevant parts of a consultation and produces a draft clinical note. The clinician must review, correct and approve the note before it becomes part of the clinical record. Heidi does not diagnose, determine treatment or replace the clinician's professional judgement.

Aruma requires health information processed through Heidi to be handled in accordance with applicable privacy requirements and Aruma's contractual and security controls. Aruma's agreement with Heidi AI requires that information processed through the service is not used to train AI models and is managed in accordance with applicable privacy, security and confidentiality obligations.

Responsible use and governance

Aruma is committed to using AI safely, responsibly and transparently. We will:

- assess privacy, security, accessibility, safety and ethical risks before approving AI tools
- restrict the use of personal and sensitive information to approved systems and authorised purposes
- maintain appropriate human review and accountability
- review this privacy statement when our use of AI changes materially, or at least annually.

Aruma may approve additional AI enabled tools from time to time. Any new tools are subject to privacy, security, legal and ethical assessments before use. Aruma's will consider the impact of AI systems on the rights, safety, dignity, choice and control of people with disability before approving their use.

Changes to this policy

As our business evolves, our business processes and policies will be reviewed and may be amended. We may change this policy at any time. We will notify you of any change by posting an updated version of the policy on our website. Please regularly check our website to make sure you keep up to date with any changes to this policy.

Complaints

We are committed to constantly improving our procedures so that your personal information is treated appropriately. If you feel that we have failed to deal with your personal information in accordance with this policy or the APPs, please contact us at the contact details listed below so we have an opportunity to resolve the issue to your satisfaction.

Our Privacy Officer will:

- listen to your concerns and grievances.
- discuss with you the ways in which we can remedy the situation; and
- put in place an action plan to resolve your complaint and improve our information handling procedures if appropriate.

Overseas disclosure of Personal Information

Aruma's core technology infrastructure is hosted in Australia. However, we occasionally use third-party overseas or cloud-based data hosting facilities and service providers. This may result in personal information being transferred to, and stored at, locations outside of Australia. These locations may include, but are not limited to, the United Kingdom, New Zealand, Canada, Singapore, and the United States of America.

By providing your personal information to us or by using our services and supports, you consent to the potential transfer, storage, and processing of your personal information outside Australia.

Where we do disclose personal information overseas, it may be to a country that does not have the same level of privacy protections afforded under Australian law. However, we take all reasonable steps to ensure that any overseas recipient of personal information complies with the Australian Privacy Principles (APPs) or is subject to a law or binding scheme that provides substantially similar protections.

We are committed to managing cross-border disclosures in accordance with our obligations under APP 8.1 and section 16C of the Privacy Act 1988 (Cth).

How we respond to data breaches

Aruma will take appropriate and prompt action, including reporting to the Office of the Australian Information Commission if an eligible data breach occurs and personal information, we hold is subject to unauthorised disclosure, use, modification or loss.

Aruma has a dedicated Privacy Officer who investigates all potential privacy breaches within 30 days of becoming aware of the potential breach.

Contact Us

If you have any questions or concerns about our Privacy Statement or our handling of your personal information, please contact our Privacy Officer by emailing: Privacy@aruma.com.au or calling 1300 725 748.