

Privacy Policy at The Sterling, Kaiapoi

1. Purpose

The Sterling, Kaiapoi is committed to complying with the New Zealand Privacy Act 2020 and has established this public statement to outline how we treat personal information.

2. Policy Statement

This policy applies to personal information held by The Sterling, Kaiapoi under the Privacy Act 2020 and its information privacy principles. The Village General Manager ensures a Privacy Officer is appointed; reception can direct privacy enquiries to that person. Staff must follow this policy and receive appropriate privacy training.

2.1. Why We Collect Personal Information

As an independent-living retirement village, we collect only personal information necessary for lawful purposes connected with accommodation, agreed services, employment and business administration about:

- Residents
- Employees
- Service Providers

We use this information to provide accommodation and agreed services, administer contracts and payments, meet legal duties and respond to safety needs.

2.2. Types of Personal Information Collected

2.2.1. Residents

Depending on the services and circumstances, necessary resident information may include:

- Names, addresses, and contact details, including next of kin and legal representatives
- Dates of birth
- Photographs
- Relevant health or accessibility information needed for agreed services or emergency assistance; collect only what is necessary.
- Insurance details only where needed for a specific agreed service.
- Cultural, religious, linguistic, and social preferences
- Interests, hobbies, and community activities
- Information on potential medical, social, or workplace risks



- Records of interactions with residents and service providers
- Service and activity preferences
- Financial information necessary for contracts, payments or a specific requested service; do not routinely collect complete income or asset details.
- Fee and charge details and payment history
- Occupancy, departure and relevant absence records
- Billing details

2.2.2. Employees and Service Providers

We also collect and hold specific information about employees and service providers, including:

- Resumes
- Names and contact details
- Employment histories
- Qualifications
- Health information necessary to assess fitness for relevant work or reasonable workplace adjustments; avoid unrelated medical histories.
- Training records and competency assessments
- Police vetting or background-check results where lawful, relevant and appropriately authorised.

3. Collecting Personal Information

3.1. Residents

We normally collect information directly from residents. When collecting it, explain the purpose, intended recipients, who holds it, whether supply is required and the consequences of not supplying it, and access and correction rights. Collect from a representative or another source only with a lawful basis and verify any representative's authority. Third-party sources, where relevant and lawful, may include:

- Other organisations supporting a resident, only where relevant to an agreed service and lawfully authorised.
- Government bodies where information is necessary for a lawful purpose or a resident's requested assistance.

3.2. Employees and Service Providers

Collect employment information directly where practicable. Explain its purpose and use.



Obtain necessary authorisation for relevant checks and collect only information needed for the role. Other lawful sources may include:

- Background checks and police checks
- Referees and employment agencies

Information about providers and their staff may come from the provider where lawful. For information collected indirectly, take reasonable steps to notify the individual under IPP3A as soon as reasonably practicable, unless an exception applies. Include the collection, purpose, recipients, collecting and holding agencies' names and addresses, required legal details and access and correction rights. Document any exception relied on.

4. Storage, Retention and Use of Personal Information

4.1. Residents

Keep paper records secure and electronic records protected by appropriate access controls. Limit access to authorised people who need the information for their work, use secure transfer methods and check accuracy before use. Retain information only as long as needed for lawful purposes and legal recordkeeping, then securely destroy or anonymise it. Resident information is used for:

- Providing accommodation and agreed village services
- Meeting applicable obligations, including the Retirement Villages Act 2003 and Privacy Act 2020.
- Quality assurance and risk management
- Continuous quality improvement

Use personal information for marketing only with a lawful basis. Obtain separate permission before using identifiable resident photographs or stories for publicity. Explain the intended use and how to withdraw permission for future use. Respect marketing opt-outs.

4.2. Employees and Service Providers

We use personal information about employees and service providers to:

- Assess their suitability for their roles
- Meet legal obligations under relevant legislation
- Improve services, staff training and workplace administration using only necessary information.



THE STERLING
KAIAPOI

5. Disclosure of Personal Information

5.1. Residents

Disclose resident information only with a lawful basis, such as authorisation, the original or a directly related purpose, a legal requirement or another permitted exception. Share only what is needed. Relevant recipients may include:

- Service providers (e.g., cleaners, gardeners)
Where there is a lawful basis, other recipients may include:
- Government agencies for funding and legal compliance
- Professional advisers

5.2. Employees and Service Providers

Disclose employee and provider information only with a lawful basis and appropriate safeguards. Before disclosing information overseas, assess the requirements of IPP12 and ensure comparable safeguards or another permitted basis. Overseas storage or processing by an agent does not remove our responsibility to protect the information.

6. Accessing and Correcting Your Personal Information

You may ask to access or correct your personal information through the Privacy Officer or Village General Manager. Verify identity and representative authority appropriately. Respond as soon as reasonably practicable and normally within 20 working days; notify any lawful extension and its reasons. Provide information without undue delay after granting access. Explain lawful refusals and the right to complain to the Privacy Commissioner. If a requested correction is declined, explain why and attach a statement of correction if requested, as required by law.

7. Complaining About a Breach of Privacy

Raise privacy concerns with the Privacy Officer through reception or the Village General Manager. You may write to:

The Village General Manager

The Sterling, Kaiapoi

300 Island Road, Kaiapoi, 7630



THE STERLING
KAI APOI

You can also use one of the following methods to lodge a complaint:

- Service improvement form available at reception
- Phone one of our managers
- Email a manager
- Schedule an appointment to meet a manager in person

8. Our Complaints System

Investigate privacy complaints promptly, explain the outcome and any corrective action, and keep the complainant informed. You may complain directly to the Office of the Privacy Commissioner at www.privacy.org.nz; you do not have to use the village residents' committee or retirement village dispute process first. The following bodies may assist with separate retirement village issues where relevant:

- The Statutory Supervisor
- The Registrar of Retirement Villages
- The Retirement Commissioner, who can provide information on residents' rights and dispute resolution under the Retirement Villages Act 2003.

9. Privacy Breaches and Online Privacy

Report any suspected privacy breach immediately to the Privacy Officer or Village General Manager. Contain it, assess the likely harm, preserve evidence and record corrective action. Where a breach has caused or is likely to cause serious harm, notify the Privacy Commissioner and affected people as soon as practicable, subject to lawful exceptions. The Commissioner's 72-hour expectation is guidance, not a statutory fixed deadline. Website cookies and analytics may process personal information; explain the actual tools, purposes and third parties in the website privacy notice. Check the website's current configuration rather than assuming cookies cannot identify people.