

## PRIVACY POLICY

Biointellect Pty Ltd ACN 154 647 051 and Bioelect Pty Ltd ACN 168 092 171 (together “us”, “we” or “our”) are committed to protecting personal information that we collect and hold.

In the course of our business, we may collect personal information, including personal information of employees or prospective employees, contractors, external providers, patients, healthcare professionals, customers, and members of the public.

We are bound by the *Privacy Act 1988* (Cth) (Privacy Act) and we will handle the personal information that we collect and hold in accordance with the Australian Privacy Principles (APPs) contained in the Privacy Act.

We are committed to the protection of personal information in accordance with all applicable privacy laws.

### About this privacy policy

This privacy policy explains how we collect, hold, use, disclose, secure and otherwise manage the personal information of individuals who use our services or interact with us. It describes the types of information we collect and hold and why, how to access and correct the information and how to make a privacy complaint.

We reserve the right to update or amend this policy, and the most up-to-date version will be available on our websites.

### What is personal information?

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable, whether that information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. Sensitive information is a type of personal information that is afforded a higher level of protection by privacy laws. It includes health, genetic and biometric information as well as information about race or ethnic origin, political opinions, membership of political, professional or trade associations or trade unions, religious beliefs, sexual orientation or practices and criminal record. References in this policy to personal information include sensitive information and health information.

### How do we collect personal information?

We may collect certain personal information from third parties including healthcare professionals (HCPs). For instance, personal information is collected when a third party:

- Contacts customer service;
- Contacts our medical enquiries and drug safety personnel;
- Registers on one of our digital platforms;
- Use any of our information services;
- Engages with our account managers;
- Attends events hosted by, or attended by us; or
- Emails, calls or otherwise communicates with us

We may also receive professional information about HCPs from other sources such as external sources of HCP information (including publicly available sources). We may combine information from various sources.

We may also collect certain personal information directly from you, including when you:

- Contact customer service;
- Contact our medical enquiries and drug safety personnel;

- Register on one of our digital platforms;
- Use any of our information services; or
- Email, call or otherwise communicate with us.

We may also collect information from other sources including manufacturers, publicly available sources or organisations engaged by us to provide certain services.

If we receive personal information that we have not requested (unsolicited information) then we may destroy or de-identify the information if it is lawful and reasonable to do so.

By providing us with your personal information, you consent to our collection, use and disclosure of your personal information in accordance with this policy and as required by law.

## Personal information that we may collect and hold

Personal information which we may collect and hold includes but is not limited to the following. The type of information collected also depends on whether you are an employee or prospective employee, HCP, customer, patient or member of the public:

- Contact and identification details including name, telephone number, address, email, phone number;
- Qualifications, area of specialty and research interests/expertise;
- Workplace information (e.g. research institute, hospital, university, specialist practice);
- Financial information, including bank details, superannuation, tax file number, if required for payment purposes;
- Personal details such as gender, age, date of birth, next of kin, signature, photo;
- Employment information such as salaries and wages, education/employment history, professional memberships, curriculum vitae;
- Business details such as ABN, contact details (including phone, mobile, email);
- Products and samples of products provided to HCPs;
- Attendance at seminars or other events;
- Information regarding enquiries made by you;
- Information regarding your interactions with our personnel, including any complaints made; and
- Other information that is needed in order to provide our services or products to you, or in response to your communications with us.

## Health information

Personal information also includes health information. Health information which we may collect and hold includes, but is not limited to the following:

- Information provided in connection with assessing, recording and reporting actual or suspected adverse drug/device events;
- Information required by law;
- Details of health history and status including genetic or biometric information, pathology, medications, side effects, surgery, treatment and underlying medical conditions;
- Medical images including CT scans, X-rays;
- Details of clinic or hospital attendance (including reported information) at which the adverse event, diagnosis or treatment was obtained; and
- Medical practitioner and other HCP details.

## Method of collection of personal information

Personal information may be collected through an electronic or paper form (via email or mail) or by phone or other form of electronic or digital communication, for example via our website. In some instances, information about an individual may be provided via an authorised third party, e.g. a person's HCP.

We will only collect personal information by lawful, secure and fair means, and not in an unreasonably intrusive way.

## Use and disclosure of personal information

We will only use personal information in accordance with applicable privacy laws.

We only collect personal information for purposes directly related to our services, business activities and legal and regulatory obligations.

Our main purposes in collecting, holding and using personal information are:

- To provide our services and products;
- For sales and marketing purposes;
- To respond to an individual's request, complaint or enquiry and maintain a record of all such communications;
- To maintain contact with customers;
- To comply with our contractual, regulatory and other legal obligations;
- To keep clients and other contacts informed of the services we offer and industry developments that may be of interest to them, and to notify them of service and product offerings, seminars and other events we or other industry participants are holding;
- To conduct market research;
- For patient support and feedback including in connection with the management and reporting of suspected or actual adverse events;
- For general management and reporting purposes, such as invoicing and account management;
- For recruitment purposes;
- For purposes related to the employment of our personnel and providing internal services to our staff;
- For any other purpose indicated at the time we collect your personal information or required in order to facilitate your interaction with us; and
- All other purposes related to our business.

We may use your personal information about individuals to contact you to market our services or products. However, individuals always have the opportunity to elect not to receive further marketing information by advising us in writing or by email. We will not send you a commercial electronic message if prohibited under the *Spam Act 2003* (Cth).

You may opt-out of receiving marketing information from us at any time by contacting us in writing or by using the opt-out facilities provided within the relevant marketing material.

If we collect or use personal information in ways other than as stated in this policy, we will do so in accordance with the Privacy Act.

Personal and health information collected and held by us will only be accessed and handled by personnel authorised to do so, for the purpose of carrying out their duties and in accordance with this policy. Except as set out in this policy, we will only use or disclose information for the purpose for which it was collected.

We may disclose personal information to third parties, including third parties located overseas, such as:

- regulatory authorities including the Therapeutic Goods Administration in Australia;
- third party manufacturers and suppliers, HCPs, clinical research organisations, pharmacovigilance service providers, patient support program administrators, market researchers, professional conference or event management organisations, IT support and data storage providers, mail houses, recruitment agencies and professional advisors;
- databases and cloud based data centres; and
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

The collection and use of your information by these third parties may also be subject to their privacy policies.

We will not use or disclose information about an individual for a secondary or another purpose, other than the main purpose of collection unless the following apply:

- The secondary purpose is related to the main purpose of collection, and, in the case of health information, is directly related to the main purpose of collection;
- The individual would reasonably expect us to use or disclose the information for the secondary purpose; and
- The use or disclosure complies with law.

We may also use or disclose personal information if such use or disclosure is reasonably necessary to lessen or prevent either:

- A serious and imminent threat to an individual's life, health, safety or welfare; or
- A serious threat to public health, public safety or public welfare.

We may use your personal information for purposes which are required by law such as sharing your personal information in order to comply with our contractual obligations or manufacturers or to comply with our regulatory obligations.

## Cross-border disclosures of personal information

From time to time we may need to disclose certain personal information to overseas entities. We will only do this if necessary, for example to report a suspected or actual adverse event to a product manufacturer or their service provider, in order to process or back-up our information or to provide certain services to us.

As a result, we may disclose your personal information outside Australia to countries whose privacy laws do not provide the same level of protection as Australia's.

However, any such disclosure of information by us will only be as necessary and for a legitimate purpose, and any such disclosure does not change any of our commitments to safeguard your privacy.

Providing us with your personal information means you consent to the cross-border disclosure of information in accordance with this policy, unless you tell us in writing that you do not consent.

## Management and security of personal information

We store personal information in both paper and electronic form. The security of personal information is very important to us and we take reasonable steps to protect it from misuse, interference and loss and from unauthorised access, modification or disclosure.

Some of the ways we do this include:

- Requiring our staff to maintain confidentiality;
- Imposing security measures for access to our computer systems;
- Providing a discreet environment for confidential discussions; and
- Allowing access to personal information only where the individual seeking access to their own information has satisfied our identification requirements.

We will never provide your information to third parties for marketing purposes without receiving your consent.

Personal and health information is retained for the period of time in accordance with applicable Australian laws after which it is de-identified or disposed of in a secure manner.

## Privacy on our websites

This policy also applies to any personal information we collect via our websites. In addition to personal information provided to us directly (such as you making a request for information or complete a registration form), we may also collect personal information from you via our websites through the use of 'cookies'. A cookie is a small file that stores information on your computer or other device. If you disable or decline cookies on our websites some functionality may be impacted.

## Links to other websites

We may provide you with links to third party websites. These linked sites are not under our control, and we cannot accept responsibility for the conduct of any person linked to our website, or any third party websites. Before disclosing your personal information on any other website, we advise you to examine the terms and conditions of using that website and its privacy statement.

## Accessing or correcting your personal information

We take all reasonable steps to ensure that the personal information we collect is accurate, complete and up-to-date, and when we use or disclose it, that it is relevant. We will also take reasonable steps to correct the personal information we hold if we are satisfied that it is inaccurate, incomplete and out of date, irrelevant or misleading, or if an individual asks us to correct their personal information for these reasons. A request to correct personal information can be made at any time as set out below.

Personal information held by us may only be accessed or corrected by the individual to whom the information belongs. We will deal with requests for access to personal information as quickly as possible, and we will endeavour to contact you within 14 days of receipt of your request.

When an individual makes a request to access personal information, we will require relevant identification (such as a driver's licence or passport) so that we can verify that they are the person to whom the information relates.

For corrections, please contact us in writing by email or mail stating clearly the errors requiring correction.

## Complaints or enquiries

Any complaints about our handling of personal information or enquiries about this policy are to be directed to contact below

Email: [enquiries@biocelect.com](mailto:enquiries@biocelect.com)

Phone: 1300 907 411

We will deal with any complaints or enquiries as quickly as possible, and we will endeavour to contact you within 14 days of receipt of communication.

For more information or if you wish to contact the Australian Information Commissioner (who may investigate your complaint further) please visit the Australian Information Commissioner's web site: <https://www.oaic.gov.au/>

January 2022