

## PRIVACY POLICY

ICSION values and respects the privacy of the people we deal with.

This Privacy Policy applies to all personal information collected by ICSION Medical Pty Ltd (ABN 64 647 947 948) and its related bodies corporate and associates (**we, us, our**), including via our website located at [www.icsionmedical.com](http://www.icsionmedical.com). This Privacy Policy is intended to inform you of our policies and practices regarding the collection, use and disclosure of any personal information you submit to us.

We have adopted the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (Cth) (**the Privacy Act**). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your personal information. A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

This Privacy Policy applies to the use of our website and our receipt of personal information from healthcare professionals, individuals and researchers using any other application or method.

### 1. What is personal and sensitive information?

- (a) "Personal information" is information about you that is personally identifiable, like your name, address, date of birth, email address, phone number, or IP address and other information that is not otherwise publicly available. It does not include anonymised or de-identified data.
- (b) Some personal information is also "sensitive information". Sensitive information has the meaning given to it in the Privacy Act. It includes your health information (including genetic information or biometric information), information about your racial or ethnic origins, your political opinions, your political associations, your religious beliefs/affiliations, your philosophical beliefs, whether you are a member of a trade or professional association or trade union, your sexual orientation/practices or your criminal record.

### 2. What personal information does ICSION collect?

- (a) The personal information which we collect and hold about you may include:
  - (i) Name;
  - (ii) Contact details such as mailing or street address, email address, telephone and fax number;
  - (iii) Geographic location;
  - (iv) Health and medical history or information (including that related to biological samples);

- (v) Bank account or credit card details if you are making a payment;
- (vi) Information collected through the use of cookies on our websites, such as your IP address, your login data, details about your browser, page views and navigation paths, length of visit to pages, details about the number of times you use our website or our services, time zone settings and other technology on the devices you use to access our website or our products or services, and other tracking technology used on our social media assets;
- (vii) Other information as required to carry out our functions and activities as an organisation; and
- (viii) Any correspondence you submit to us.

If we collect your sensitive information, we will do so only with your consent, or as otherwise required by law.

### **3. How do we collect your personal information?**

We may collect personal information from:

- (a) you directly;
- (b) third parties with your explicit consent;
- (c) third parties when it is unreasonable or impracticable to collect the personal information from you directly, and where we require the personal information to provide services to you.

When collecting personal information, we may collect it in ways that include:

- (a) through your access and use of our website;
- (b) during conversations or communications between you and our staff;
- (c) when you complete documentation; and
- (d) when you participate in the services we provide or other research activities.

We may collect cookies from your computer which enable us to tell when and how you use the website and also help to customise your website experience. As a general rule, however, it may not be possible to identify you personally from our use of cookies, and your browser settings may allow you to choose what cookies are shared with us.

### **4. Why do we collect, hold and use your personal information?**

We may collect, hold or use your personal information (including sensitive information) for one or more of the following purposes:

- (a) to provide services to you;
- (b) to verify your identity, respond to your requests or inquiries, or as otherwise directed by you;
- (c) to provide you with news, information, reminders, and material (including marketing material) in relation to services and products provided by ICSION;

- (d) to undertake health and medical research as consented to by you;
- (e) to conduct activities related to quality assurance/improvement processes, accreditation, audits, risk and claims management, service development, and staff education and training;
- (f) to undertake general research and development or other reasonably related research activities;
- (g) to obtain feedback about our services or products, including surveys, polls and patient satisfaction surveys;
- (h) for administrative purposes, including to update our records and keep your contact details up to date;
- (i) to process and respond to a request or complaint made by you;
- (j) for billing and payments;
- (k) to engage you (as a contractor) to provide products or services to us;
- (l) to consider your application for employment with us;
- (m) as we consider reasonably necessary or appropriate to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, respond to legal process or requests for information issued by any governmental or legal authority in Australia, and to protect your, our, or others' rights.

We may not be able to do some or all of these things without your personal information.

If at any time we intend to change the purpose for which we hold your personal information, for example to offer you with a complimentary service that we may provide in the future, we will give you prior information of that new purpose.

Any marketing communications from us will include instructions on how to opt-out of future mailings. You may alternatively contact us at [icsion@icsionmedical.com](mailto:icsion@icsionmedical.com) to opt-out.

## **5. De-identified information**

We may de-identify your personal information or aggregate it in such a way that it cannot be used to identify you. We may disclose de-identified information for any purpose we see fit, including to conduct, publish and/or present research studies, and/or to develop diagnostics, therapeutics or other products/services.

Our de-identification procedure involves:

- (a) removing personal identifiers;
- (b) removing or altering other information that may allow you to be identified; and
- (c) continuously assessing and managing the risk of re-identification.

## **6. How do we secure your personal information?**

Our information security is supported by a variety of processes and procedures, and we store information in access-controlled premises or electronic databases requiring logins and passwords. All employees, officers or contractors of ICSION and third-party providers with access to confidential information are subject to access controls and confidentiality obligations, and we require our third-party data storage providers to comply with appropriate information security industry standards.

While we have taken steps that are reasonable in the circumstances to protect the personal information we hold from misuse, interference and loss and from unauthorised access, modification or disclosure, we cannot guarantee that such misuse, interference, loss, or unauthorised access, modification or disclosure will not occur.

Whilst we continually strive to ensure that our systems and controls are updated to reflect technological changes, the transmission of information via the internet is not completely secure, and as such we cannot guarantee the security of your personal information transmitted to our website or online services, which is at your own risk.

If you communicate with us using non-secure web platforms, you assume the risks that such communications between us are intercepted, not received, delayed, corrupted or are received by persons other than the intended recipient.

We cannot be held liable in any way for events beyond our control or in any way for accidental or unauthorised access of your personal information. Unauthorised access could involve someone who is known to you guessing your password or a stranger gaining access to your login details. To prevent this never give your access details to anyone, this includes your password.

## **7. Breach notifications**

We are committed to disclosing any potential security breaches that could result in your personal information being disclosed to unauthorised parties as per the Australian notifiable data breach scheme set out in the Privacy Act 1988 (Cth). In the unlikely event of such a breach, ICSION will notify the Office of the Australian Information Commissioner and the affected individuals (if we are not precluded from doing so by a law enforcement agency or other legitimate organisation).

## **8. Who may we disclose your personal information to?**

We may disclose your personal information where it is necessary to provide products and services to you, or for any other legitimate purposes described in this Privacy Policy. In particular, we may disclose it to:

- (a) our staff, which include our paid employees, and contractors;
- (b) our professional advisors;

- (c) our partners, affiliates, research collaborators, contractors and consultants;
- (d) any organisation or any authorised person where you have directly consented to such disclosure; and,
- (e) a person or organisation to whom we are compelled by law, or otherwise permitted by law, to provide your information.

We may also disclose your personal information if all or part of ICSION Medical Pty Ltd is sold, merged, dissolved, acquired, or involved in a similar transaction, however any such process would still require compliance with the Australian Privacy Principles.

#### **9. Does ICSION disclose your personal information to anyone outside Australia?**

We may disclose your personal information to subsidiaries of our parent company, ICSION Medical Pty Ltd, or to trusted third parties overseas for the purposes of the activities described in section 4 of this Privacy Policy.

#### **10. What steps will we take when disclosing information to a third party?**

Where we transfer your personal information to a third party, we will take reasonable steps to ensure that your personal information is protected and is handled by that third party in accordance with this Privacy Policy (where applicable) and the requirements of the Privacy Act by imposing obligations of security and confidentiality on such third parties.

Where we disclose personal information to third party service providers who are necessary for us to provide services to you or to fulfil requests made by you (for example, we may provide your name and address to a third party shipping company to ship you a product you request), we will only provide that third party with the minimum information needed to perform any such service requests.

To the extent that it is reasonable and practical for us to do so, we will de-identify personal information and remove sensitive information prior to disclosure to a third party.

#### **11. How can you access and correct your personal information?**

ICSION will endeavour to keep your personal information accurate, complete and up to date. We believe in individuals having access to their personal information and the ability to correct it. The Australian Privacy Principles permit you to obtain access to the personal information we hold about you in certain circumstances, and to correct inaccurate personal information subject to certain exceptions. If you would like to obtain such access, please contact us as set out below.

We reserve the right to refuse to provide you with personal information that we hold about you in certain circumstances set out in the Privacy Act, including (without limitation) if release of the information would have an unreasonable impact on the privacy of others.

## **12. Links to external third party websites**

Our website may include links to third party websites. This does not constitute an endorsement of these websites or their contents. We have no control over, do not review and take no responsibility for, third party websites, any personal information they may collect, or their privacy policies. Third party providers / websites are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies. We suggest users to be cautious when using third party websites.

## **13. How to contact us about privacy**

If you would like any further information, have any queries, would like access to your personal information, or have a complaint about our Privacy Policy or our information handling practices in general, you can contact us through: [icsion@icsionmedical.com](mailto:icsion@icsionmedical.com).

## **14. Changes to privacy policy**

As we plan to ensure our privacy policy remains current, this policy is subject to change. Please return periodically to review our Privacy Policy.