

# SPECIALISED THERAPEUTICS PRIVACY POLICY

In this Privacy Policy a reference to “**Specialised Therapeutics**”, “**we**”, “**our**” or “**us**” is a reference to the following entities: Specialised Therapeutics Australia Pty Ltd ABN 73124031241, Specialised Therapeutics Unit Trust AFT Specialised Therapeutics Investments Pty LTD ABN 24734315957, Specialised Therapeutics H Pty Ltd ABN 88614709161, Specialised Therapeutics Pharma Pty Ltd ABN 77609261430, Specialised Therapeutics Glio Pty Ltd ABN 87615304053, Specialised Therapeutics Aria Pty Ltd ABN 52617311092, Specialised Therapeutics Alim Pty Ltd ABN 61617311127, Specialised Therapeutics PM Pty Ltd ABN 50617311083, Specialised Therapeutics Limited NZBN 9429032249262, and Specialised Therapeutics Asia Pte Ltd incorporated in Singapore. Registration Number 201531500E.

At Specialised Therapeutics we recognise the importance of your privacy and understand your concerns regarding the security of the personal information which you provide to us.

This Privacy Policy details the type of personal information we collect when you use our websites, products and services that link to this Privacy Policy (“**Services**”). This Privacy Policy also details how we store and process personal information about you, with whom we may share it and the choices available to you regarding our use of the information. We also describe the measures we take to safeguard your personal information and tell you how to contact us regarding our privacy practices. We will only use the personal information collected from you in accordance with this Privacy Policy.

If you or your organization has an individual agreement with us, that agreement may have privacy terms that also apply to the information you provide to us under that agreement. Please review the terms in that agreement because they may be different or more restrictive than the terms in this Privacy Policy.

While our Services may contain links to websites owned by third parties, those websites are not subject to our privacy standards, policies and procedures. We recommend that you make your own enquires as to the privacy policies of these third parties and we are in no way responsible for the privacy practices of these parties.

By submitting your personal information to us or by using our Services, you understand and consent to us using your personal information as described in this Privacy Policy.

## 1. How we collect personal information

### Healthcare professionals

We collect certain personal information directly from you. For example, you provide us with personal information about yourself when you:

- order products from us;
- contact customer support;
- contact medical enquiries and drug safety;
- register on one of our digital platforms;
- engage with one of our sales representatives;
- attend events hosted by or attended by us;
- email us or call us; and

- otherwise submit information to us via the Services or ST employees.

We also collect other information about your online activities and your use of our Services automatically, usually from the use of Cookies and Web Beacons.

We may also receive professional information about you from other sources, such as external sources of healthcare provider information (including publicly available sources), and your patients (eg where they have told us that you are their healthcare provider). We may combine information that we have about you from various sources, including the information that you have provided to us.

### **Members of the public**

We collect certain personal information directly from you. For example, you provide us with personal information about yourself when you:

- order products from us;
- contact customer support;
- contact medical enquiries and drug safety;
- email us or call us;
- submit information to us via your health care professionals; and
- otherwise submit information to us via the Services or ST employees.

We may combine information that we have about you from various sources.

We also collect other information about your online activities and your use of our Services automatically, usually from the use of Cookies and Web Beacons.

We may also collect information about you from other sources, such as third parties who provide services to us.

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

## **2. Types of personal information we collect and hold**

### **Healthcare professionals**

If you are a healthcare professional interacting with us in your professional capacity, the personal information that we collect about you may include:

- your name
- your email and mailing address
- your phone number
- your date of birth, age
- your gender
- your contact preferences
- your language
- your professional details (such as your education, occupation/position/role, hospital, medical specialty, and medical practitioner number or government issued ID)

- activity data, such as whether an email we sent you was opened, or if you accepted an invitation to a webinar
- information from your visits to our websites, including the type of browser and operating system you use, access times, pages viewed, URLs clicked on, your IP address and the page you visited before navigating to our websites
- device information, including the unique device identifier, hardware model, operating system and version, and mobile network information
- your responses to any surveys that you may choose to participate in, including disease or practice-related survey responses (such as an estimate of the number of patients you see who have a certain condition).

### **Members of the public**

If you are a member of the public, the personal information that we collect about you may include:

- your name
- your email and mailing address
- your phone number
- your date of birth, age
- your gender
- your zip/area code
- activity data, such as whether an email we sent you was opened
- information from your visits to our websites, including the type of browser and operating system you use, access times, pages viewed, URLs clicked on, your IP address and the page you visited before navigating to our websites
- device information, including the unique device identifier, hardware model, operating system and version, and mobile network information
- your responses to any surveys that you may choose to participate in.

We may also process information about you which reveals information about your health status. For example, where you tell us about a health condition you are experiencing, where we receive a report that you have experienced a side effect associated with one of our products, or where health information can be inferred from information that you have provided to us when you get in touch with us for any reason. Where we process this type of information about you we will, if required by law, take appropriate steps to get your consent to our use of this information.

### **3. Why we collect, hold, use and disclose personal information**

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities and as necessary to provide the Services to you. We also collect, hold, use and disclose your personal information for related purposes that you would reasonably expect, such as our administrative and accounting functions.

For example, we may use the information obtained from you at your request to:

- provide you with any products purchased from us; and
- respond to and communicate with you about your requests, questions, comments and adverse events reported.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction you have entered into, or provide our Services to you to the best of our ability.

In addition, we use information collected online through the use of cookies and web beacons and other automated means. This information is used to:

- recognise your device when you use the Services;
- manage our Services;
- offer and provide products, services and information to you;
- help us to make decisions about maintaining and improving our Services;
- analyse your use of the Services;
- personalise the Services, including targeted advertisements that may be of particular interest to you;
- help diagnose technical and service problems;
- identify users of our Services; and
- gather demographic information about our users.

We have provided further information regarding our use of cookies in section 5 of this Privacy Policy.

We may also use your personal information for purposes which are required by law such as sharing your personal information in order to comply with legal obligations to which we are subject.

### **4. Marketing**

Where required by applicable law, we will obtain your consent before sending you any marketing communications. You may withdraw your consent to the use of your data for marketing purposes at any time by contacting us on our contact details in section 144 of this Privacy Policy.

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

## **5. Cookies**

We use technologies like cookies and web beacons to recognise you when you to visit our website or use our online services and to provide, improve, protect and promote our services and products.

### What are cookies?

A "cookie" is a small text file which is placed on your computer or device by our webpage servers when you access our websites. The purpose of a cookie is to help analyse web traffic and to allow our services to respond to you when you return to our websites. Cookies are also used to enhance the secure use of our services.

Cookies are frequently used and in themselves do not identify the user, just the computer used.

### How we use Cookies

When you browse our websites, we may record geographical tagging, cookies and statistical data. This may include your IP address, date and time of your visit, operating system, language preferences, device characteristics, pages visited, information downloaded and type of browser used to access the website.

### Why we use Cookies

We use cookies because they help us recognise your device when you use our websites, manage and improve our websites and Services, analyse your use of our websites, help diagnose technical and service problems and gather demographic information about our users.

### Web Beacons

We also may use "web beacons" on our websites. A web beacon, also known as a pixel tag or clear GIF, may be used to transmit information collected through cookies to our service providers' servers, such as the server of Google AdWords. These web beacons enable our service providers to compile anonymous information about your browsing activity.

### Disabling Cookies

You can choose if and how a cookie will be accepted by configuring your preferences and options in your browser. However, if you decide not to display cookies you may not experience optimum performance of our websites or online

## **6. Lawful Basis for Processing Your Information**

If European Data Protection Laws apply, our lawful basis for collecting and using the information described in this Privacy Policy will depend on the information concerned and the specific context in which we collect or use it.

We normally collect or use information from you where we have your consent to do so, where we need the information to perform a contract with you or to provide our services or products to you upon your request, or where the processing is in our

legitimate interests and not overridden by your data protection interests or rights and freedoms.

For example, when we:

- use information to effect a transaction you have requested, we need it in order to provide you with the product or services you are purchasing;
- use names and email addresses for email marketing purposes, we do so with your consent (which you can revoke at any time); and
- gather usage data and analyze it to improve our Services and services, we do so based on our legitimate interest in safeguarding and improving our Services and services.

If you have questions about or need further information concerning the lawful basis on which we collect and use your personal information, please contact us using the contact details in section 14 of this Privacy Policy.

## **7. Disclosure of Information**

### Information shared to third parties

We will disclose personal information to third parties if it is necessary for the primary purpose of collecting the information, or for a related secondary purpose, if the disclosure could be reasonably expected. Where such a disclosure is necessary, we will require that the third party undertake to treat the personal information in accordance with all applicable privacy laws to which we are bound and in accordance with this Privacy Policy.

We may share your personal information as follows:

- to companies that are related to us through common ownership; and
- to contractors or third parties that assist us in providing our services, such as World Courier, which provides warehousing and logistics support services.

Where we wish to use or disclose your personal information for other purposes, we will obtain your prior consent.

Otherwise, we will only disclose your personal information to third parties without your consent if the disclosure is:

- necessary to protect or enforce our legal rights or interests or to defend any claims;
- necessary to prevent or lessen a serious threat to a person's health or safety;
- required or authorised by law; or
- permitted by another exception in the applicable privacy laws.

Under no circumstances will we sell personal information without the consent of the person to whom it relates.

### Company reorganisation

In the event that we undergo reorganisation or are sold to a third party, any personal information we hold about you may be transferred to that re-organised entity or third party in compliance with applicable law.

## **8. How we protect your personal information**

We respect the privacy of your personal information and will take reasonable steps to keep it strictly confidential.

Your personal information may be held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference, loss and unauthorized access, modification and disclosure.

The steps we take to protect your personal information include the following:

- data held and stored on paper is stored in lockable offices and in secure premises;
- data held and stored electronically is protected by internal and external firewalls, limited access via file passwords, and files designated read-only or no access;
- when transferring information to others, we ensure that appropriate and suitable safeguards and data protection measures are in place to protect your personal information;
- where we disclose personal information to third parties our contractual arrangements with them include specific privacy requirements;
- only authorised personnel will have access to personal information;
- our staff receive training on privacy procedures.

Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it.

You should bear in mind that submission of information over the internet is never entirely secure. We cannot guarantee the security of information you submit via our website whilst it is in transit over the internet and any such submission is at your own risk.

## **9. Overseas transfers of information**

We may transfer your personal information outside of your home country. The countries to which your personal information is transferred may not offer an equivalent level of protection for personal information to the laws of your home country. These countries may include: United States and countries within the European Union.

If your personal information is disclosed to another country we will ensure that any disclosure is in accordance with the relevant laws, and that appropriate safeguards are put in place.

If you would like further information regarding where your personal information is stored please contact us using our contact details in section 3 of this Privacy Policy.

## **10. Retention of Information**

We will only retain your personal information for as long as is reasonably necessary in relation to the purposes for which it was collected. We will also retain personal information to ensure compliance with any applicable statutory or regulatory obligations imposed on us in relation to the retention of records.

Where you have requested we stop processing your personal information we may retain a record of your request to ensure we abide by your request in the future.

## **11. Destruction and De-identification**

If you request that we delete any personal information which we hold about you, we will use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed. For example, paper records are shredded or destroyed securely and any electronic records are deleted from all locations, to the best of our ability, or permanently de-identified.

## **12. Your Rights**

Under the legislation applicable to you, you may be entitled to exercise some or all of the following rights:

- A. Request (i) access to (and/or duplicates of) your personal information retained by us; (ii) information as to whether your personal information is retained, the purposes of the processing of your information, the categories of personal information concerned, any recipients of your data as well as potential retention periods.
- B. Request rectification, erasure, removal or restriction of your personal information, for example, because (i) it is incomplete or inaccurate, (ii) it is no longer needed for the purposes for which it was collected, or (iii) the consent on which the processing was based has been withdrawn.
- C. Refuse to provide us with, or withdraw, your consent to processing of your personal information at any time.
- D. Object, on grounds relating to your particular situation, that your personal information shall be subject to processing. In this case, please provide us with information about your particular situation. After the assessment of the facts presented by you we will either stop processing your personal information or present you our compelling legitimate grounds for an ongoing processing.
- E. Object to us sending you direct marketing and profiling you for the purpose of direct marketing.
- F. Object to your data being subject to any automated decision making, including profiling (decisions based on data processing by automatic means, for the purpose of assessing several personal aspects).
- G. In certain circumstances you may request to receive the personal information that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without hindrance from us.



- H. Lodge a complaint regarding our processing of your personal information with a relevant authority in a country where you live, work, or where you believe a breach may have occurred, or take legal action in relation to any potential breach of your rights regarding the processing of your personal information.

If you wish to contact us in relation to any of the rights outlined in this section, you can do so by contacting us using our contact details in section 14 of this Privacy Policy.

### **13. Children**

Our Services are not directed at children under the age of 16. We do not knowingly collect personal information from children under 16.

If we learn that we have collected personal information of a child under 16 years old we will take steps to delete such information as soon as possible.

### **14. Contact**

If you have any questions, concerns, complaints or comments about this Privacy Policy or any requests concerning your personal information please contact us at

Customer Service  
Level 2, 17 Cotham Road  
KEW, Victoria 3101, Australia

Telephone: 1300 798 820 or +61 3 9859 1493

### **15. Amendments to the Privacy Policy**

We reserve the right to change this policy from time to time. Please check the Services regularly and check our respective current Privacy Policy.

This policy was last updated on **09 January 2019**.