



# ALCIDION

## Privacy Policy

Alcidion Group Limited

ACN 143 142 410

**Version No:** V02

**Approved by:** Alcidion Board

**Effective from:** 16 March 2023

## Document Revision History

Approval Date	Version	Approved By	Summary of Amendments
13 October 2020	V01	Board	Policy adopted
16 March 2023	V02	Board	Routine review

## Other Policy Details

Key Information	Details
Approval Body	Alcidion Group Limited Board of Directors
Key Stakeholders	Alcidion Group Limited Board of Directors Audit and Risk Committee Executive Leadership Team
Responsibility for Implementation	Chief Executive Officer Group General Counsel
Policy Custodian	Group General Counsel
Next Review Date	15 March 2024
Reference Policies	Data Protection Policy Data Retention Policy

## Legislative and Regulatory Framework

Authority	Law, Resolution or Regulation
Parliament of Australia	Australian Federal Privacy Act 1988 and Australian Privacy Principles
European Union	EU Regulation 2016/679 General Data Protection Regulation ('GDPR')
United Kingdom ('UK') Parliament	UK General Data Protection Regulation 2016
UK Parliament	Data Protection Act 2018
UK Parliament	The Data Protection, Privacy and Electronic Communications (Amendment Etc.) (EU Exit) Regulations 2019
New Zealand Parliament	NZ Privacy Act 2020 and Privacy Principles

## 1. Our Commitment to Privacy

- 1.1 Alcidion Group Limited (the **Company**) recognises the importance of privacy and is committed to protecting the privacy of its shareholders, employees and other related parties when handling your personal information. From the outset, it should be noted that all personally identifiable information is managed with the utmost confidentiality.

## 2. Purpose

- 2.1 This Privacy Policy (Policy) explains the Alcidion Group's broad approach to how we will collect, hold, use, disclose, protect and otherwise handle your personal information. For the country specific detail on how we handle your personal information, please go to the "Privacy" tab at the foot of the Alcidion home page for the country in which you are situated.
- 2.2 This Policy is supplemented by:
  - a) Alcidion's Data Protection Policy which sets out the obligations of Alcidion regarding data protection and the rights of data subjects including employees, customers and business contacts in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation ("GDPR"); and
  - b) Alcidion's Data Retention Policy.

## 3. Terminology

- 3.1 In this Policy the expressions 'the Company', 'we', 'it', 'us' and 'our' are a reference to the Company.
- 3.2 De-identification refers to a process of removing or masking direct identifiers in personal data such as a person's name, address or unique healthcare identifier number associated with them. De-identification includes what is called pseudonymisation.
- 3.3 Anonymisation refers to a process of ensuring that the risk of somebody being identified in the data is negligible. This invariably involves doing more than simply de-identifying the data, and often requires that data be further altered or masked in some way in order to prevent statistical linkage.

## 4. What is personal information?

- 4.1 Personal information is information or an opinion about an individual who is identified or capable of identification from the information, whether that information or opinion is true or not.
- 4.2 De-identified information is not personal information and involves the removal or alteration of other information that could potentially be used to re-identify an individual.
- 4.3 Sensitive information is personal information that is given a higher level of protection by privacy laws. It includes information about an individual's health and includes genetic and biometric information. It also includes 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. In this privacy policy when we talk about personal information, we include sensitive information.

## 5. Why we collect information

- 5.1 The Company collects personal information so that it can carry out its business of providing goods and services to its healthcare customers, administer individuals' investment in the Company and comply with its legal obligations. The individuals whose personal information

is collected includes people who work for our existing customers, potential customers, suppliers and other partners. In addition, Alcidion handles patient identifiable information when providing its products and services. In relation to the collection of this information, patients and care professionals should refer to the privacy policy of the relevant organisation who is providing the care or treatment.

## **6. What kinds of personal information do we collect?**

6.1 The types of personal information which we may collect, and hold include, without limitation:

- a) your name;
- b) address and other contact details;
- c) date of birth;
- d) tax file number (TFN) (applicable only to Australia); and
- e) banking details.

Generally, the Company will not collect sensitive information about you (such as your race or ethnic origin, political beliefs or religion). If the Company needs sensitive information, it will ask your consent when it collects this information and comply with the Australian Privacy Principles contained in the Privacy Act.

## **7. How we collect personal information**

7.1 Collecting information from you

How the Company collects your personal information will largely depend on whose information it is collecting. If it is reasonable and practicable to do so, the Company will collect personal information directly from you.

Depending on how you choose to interact with the Company, the Company may collect your personal information when you contact the Company or its service providers by telephone, by email, through the Company's website or when you complete a form or document and provide it to the Company.

7.2 Collecting information from third parties

The Company may also collect information about you from other people (e.g. a third-party administrator) or independent sources. For example, the Company may collect personal information about you from its services providers, including the Company's share registry, Computershare Limited. However, the Company will only do so where it is not reasonable and practicable to collect the information from you directly. Where the Company has collected your information from a third party, such personal information will be held, used and disclosed by the Company in accordance with this Privacy Policy.

When you provide the Company with personal information you consent to the use, disclosure and handling of your personal information in accordance with this Privacy Policy and any subsequent amendments.

7.3 Collecting information from visits to the Company's website

The Company may collect information based on how you use its website including through 'cookies', web beacons and other similar technologies. Cookies are small text files that websites or apps may place on your computer or device and collect non identified/anonymous information about the users of its website such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to the website.

The Company uses cookies to provide you with a more consistent experience across our services and reserves the right to ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or the third party. This information is collected to analyse and improve the Company's website, its marketing campaigns and to record statistics on web traffic.

No attempt is made by the Company to use this information to personally identify you. We record a variety of information from interactions with our online services including IP address, locations data (where available and not disabled by the user), dates, times, and other user activity. In most cases we will not be able to reasonably identify an individual from the information collected. However, if cookie information is linked with personal information we hold about you as set out above, this cookie information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

You can remove or reject cookies by adjusting the settings on your web browser.

#### 7.4 Unsolicited information

If the Company receives personal information that it has not requested, or it determines that the personal information received is not reasonably necessary to provide its services, the Company will take reasonable steps to de-identify or destroy that personal information.

## 8. How we hold your personal information

8.1 The security of your personal information is of paramount importance to the Company and it takes reasonable steps to protect the personal information it holds about you from misuse, loss, unauthorised access, modification or disclosure. The Company has a number of safeguards in place to protect the personal information we hold, including password protected databases, staff training and system firewalls. The Company maintains password security and restricted access to all electronic documents containing personal information and stores hard copy documents in secured locations.

8.2 The Company will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the purpose for which the information was used or disclosed.

## 9. How do we use your personal information

9.1 The Company will not use or disclose personal information that we collect for any purpose other than the primary purpose of collection unless:

- a) such use is related to the primary purpose and you would reasonably expect us to use or disclose the information for that other purpose;
- b) in the case of direct marketing not related to our activities - we have obtained your prior consent (unless it is not reasonably practicable to seek your consent and we otherwise comply with the requirements of the Privacy Act); or
- c) the use or disclosure is otherwise permitted under the Privacy Act or required to comply with any relevant laws, regulations, codes or practice and court orders.

9.2 As a general rule, we do not engage in direct marketing activities. To the extent that we do engage in direct marketing in the future, however, you may at any time request us not to provide you with any further direct marketing communications by contacting us via the details set out below.

9.3 By using our website, you will be deemed to consent to us using your personal information collected by our website for the following purposes:

- a) notifying you about any changes to the information which currently exists on the website;
- b) notifying you in the future about new information relevant to our services; and
- c) monitoring your use of our website.

## **10. How is personal information disclosed to others?**

- 10.1 The Company does not sell, rent or trade personal information to, or with, third parties.
- 10.2 The Company's website may contain links to other websites. The Company does not share your personal information with those websites, and it is not responsible for their privacy practices.
- 10.3 In some circumstances your personal information may be disclosed to service providers that perform a range of services on behalf of the Company including:
  - a) mailing houses and printing companies;
  - b) auditors and solicitors;
  - c) registry providers (including Computershare Limited);
  - d) information technology vendors; and
  - e) other consultants.

Personal information may be disclosed to third parties within or outside of Australia.

- 10.4 If the Company transmits your personal information over the internet (for example to third parties who hold data outside Australia) we will take reasonable steps to maintain the security of any personal information to prevent misuse and unauthorised access. Despite these protection mechanisms, you should be aware there are inherent risks associated with the transmission of data over the internet and we cannot guarantee any transmission will be completely secure.
- 10.5 Where the Company discloses your personal information to its service providers, it will take steps to ensure that they are authorised to only use personal information in order to perform the functions required by the Company and in accordance with the Privacy Act.
- 10.6 The Company may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements. In particular, the Corporations Act 2001 (Cth) requires certain information about you to be included in the Company's registers which are able to be accessed by the public.

## **11. Data Security**

- 11.1 We will take reasonable steps to protect the personal information which we hold from misuse or loss and from unauthorised access, modification or disclosure. Any personal information which is no longer required for any purpose by the Company will be destroyed.

## **12. Data Anonymisation**

- 12.1 The Company has strict protocols in relation to data anonymisation which needs to be completed where practicable in circumstances where the Company and its employees do have access to sensitive information in the course of providing the Company's solutions to customers.

### **13. Ensuring your personal information is up to date**

- 13.1 It is important that the personal information we collect from you is accurate, complete and up to date.
- 13.2 During the course of our relationship with you, we will ask you to tell us of any changes to your personal information. However, you can contact us at any time to update your personal information or to tell us that the information we hold about you is inaccurate or incomplete.
- 13.3 You may choose to restrict the collection or use of your personal information by emailing [marketing@alcidion.com](mailto:marketing@alcidion.com)

### **14. Access, Correction and Further Information**

- 14.1 We will provide you with access to your personal information held by us, unless we are permitted under the Privacy Act to refuse to provide you with such access. Please contact us on the details below if you:
  - a) wish to have access to the personal information which we hold about you;
  - b) consider that the personal information which we hold about you is not accurate, complete or up to date; or
  - c) require further information on our personal information handling practices.
- 14.2 If you believe that the Company has not protected your personal information as set out in this privacy policy or has denied you access to your personal information in potential breach of the Privacy Act, you may lodge a complaint by writing directly to the Company. We will endeavour to respond to your request within 30 days. All such complaints will be handled with the appropriate discretion.
- 14.3 If you are not satisfied with the result of your complaint to the Company or if your complaint remains unresolved, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner (OAIC) at [www.oaic.gov.au](http://www.oaic.gov.au) to have the complaint heard and determined.
- 14.4 Further information on the Act and the Australian Privacy Principles can be found at [www.privacy.gov.au](http://www.privacy.gov.au).

### **15. How to contact us**

- 15.1 All correspondence should be directed to the Company Secretary on:

Tel: 03 8060 6177  
E-Mail: [melanie.leydin@vistra.com](mailto:melanie.leydin@vistra.com)  
Mail: Alcidion Group Limited  
Level 10, 9 Yarra Street  
South Yarra Vic 3141

### **16. Disclosure**

- 16.1 From time to time, we may change our policy on how we handle personal information or the sort of personal information which we hold. Any changes to our policy will be published on our website [www.alcidion.com](http://www.alcidion.com)

### **17. Review and Amendments**

- 17.1 This Policy will be reviewed by our Board on an annual basis to ensure it remains effective and meets the best practice, industry standards and our needs.

17.2 The Policy cannot be amended without approval from our Board.