

Privacy Policy

1. Purpose of policy

This is the official Privacy Policy of Luxcan Health Pty Ltd (“Luxcan Health”, “we”, “our”, “us”). This policy explains how we collect, store, use and disclose personal information and explains your right to access or to make a complaint about our handling of personal information. Personal information means information which identifies you as an individual or from which your identity can be reasonably ascertained (and regardless of the form of the information, and regardless of whether it is true or not).

Important Information and who ‘we’ are.

The “**Company**” as set forth in this Privacy Policy shall refer to:

Luxcan Health Pty Ltd
ACN 631 564 148

Address

Level 30, 264-278 George Street
Sydney NSW 2000

Postal address

GPO Box 673
Sydney NSW 2001

Website: www.luxcanhealth.com

2. Collection

Luxcan Health collects personal information from you in several different ways. We may collect personal information directly from you or during our dealings.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

(a) **Identity Data** includes first name and last name, plus Medicare Number, address and DOB.

(b) **Contact Data** includes email address and telephone number.

(c) **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website.

(d) **Usage Data** includes information about how you use our website, products and services.

(e) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

The personal information we collect about you may include (but may not be limited to) your name, date and place of birth, contact details, Medicare Number, medical history, Internet Protocol (IP) address and occupation. If we are not able to collect information about you, we may not be able to provide you with products services and assistance to the extent that they require us to collect, use of disclosed personal information.

3. Use and disclosure

Luxcan Health may use or disclose your personal information for the purpose for which it was collected. We will also use and disclose your personal information for a secondary purpose that is related to a purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose.

Other instances when we may use and disclose your personal information include:

- Where you have expressly or impliedly consented to the use or disclosure;
- In confidence, to our medical advisers
- In confidence, to third parties to improve our services and obtain feedback;
and
- Where the use or disclosure is authorised or required by or under an Australian law or court/tribunal order.

We may also disclose your personal information to third parties, including:

- Share your personal information with our medical advisors and consultants;
and
- With third party service providers we use in conducting our business, subject to confidentiality provisions, as we deem appropriate.
- Some third parties to whom we disclose your information that may be located outside Australia.

For example, we may disclose your personal information to external national or overseas facilities in the course of conducting information and data processing, back and scanning or for the purposes of obtaining other services from third parties.

The countries in which these third parties are located will depend on the circumstances. However, in the course of our ordinary business operations we commonly disclose personal information to third parties located in the following countries:

- Canada
- The United States of America
- New Zealand
- Selected European Union Countries; and
- The United Kingdom.

4. Information about events, the Website and our services

We may contact you via email, SMS or other means to provide you with updated information about the Website, in relation to events or to provide you with other information about our services. If you do not wish to receive any such information, please contact us as set out below.

5. The information we keep about you

You have a right to request access to or correction of your personal information held by us. If you wish to access, correct or update any personal information we may hold about you, please contact us as set out below.

To ensure confidentiality, details of your personal information will be passed on to you only if we are satisfied that the information relates to you. A fee will not be charged for an access request, but you may be charged the reasonable expense we incur (such as search and copying costs). If we refuse to provide you with access or correct the personal information held about you by us (in accordance with the Privacy Act), then we will provide reasons for such refusal.

6. Notifiable Data Breaches Scheme

In the event of any loss, or unauthorised access or disclosure of our personal information that is likely to result in serious harm to you, Luxcan Health will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with the privacy Act 1988.

7. Complaint's process

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Act,

please contact us as set out below. The Privacy officer will investigate the complaint and determine whether a breach has occurred and what action, if any, to take. When contacting us, please provide as much detail as possible in relation to the query, issue or complaint.

We will take any privacy complaint seriously. We will aim to resolve any such complaint in a timely and efficient manner, and our target response time is 30 days. We request that you cooperate with us during this process and provide us with the relevant information we may require.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also make a formal complaint with the Office of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia).

Office of the Australian Information Commissioner (OAIC)

Phone

1300 363 992

Mail

Director of Compliance
Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

Website

www.oaic.gov.au

8. Storage and Security of your personal information

Luxcan Health will take reasonable steps to keep any personal information we hold about you secure. Luxcan Health excludes all liability (including in negligence) for the consequences of any unauthorised access to your personal information. Please notify us immediately if you become aware of any breach of security.

We may store your files in hard copy or electronically in our ordinary IT systems. These may include Australian-based cloud servers or the servers of third parties within Australia.

When we have disclosed your personal information to third parties, as described in section 3 of this Privacy Policy, your files may be stored by or transferred to entities located outside of Australia. The storage or transfer of your personal information by these third parties will be subject to confidentiality provisions as we deem appropriate.

We implement a range of physical and electronic safety measures to protect the personal information that we hold. Including;

- Mandatory password protection on all computers
- Firewall and antivirus/malware software; and
- 2 factor authentication

Staff receive periodic bulletins on security issues, to foster a security aware culture. We also have a regular review program to test the security measures in place and identify where changes may be necessary or desirable.

9. Changes to this Privacy Policy

We may change the Privacy Policy at our discretion. By continuing to use the Website, or otherwise continuing to deal with us, you accept this Privacy Policy as it applies from time to time.

10. Contact Us

Please direct any privacy issues or queries to Luxcan Health Privacy Officer at privacy@luxcanhealth.com.