

Privacy Policy

BTC Health Limited respects the rights of individuals to privacy and the confidentiality of information about individuals it deals with.

BTC Health Limited is required to comply with the Privacy Act 1988 (Cth) (Privacy Act), and handles the personal information that it collects and holds in accordance with the Australian Privacy Principles (APPs) contained in the Privacy Act.

BTC Health Limited is committed to the protection of personal information of its shareholders, employees and other related parties when handling your personal information. From the outset, it should be noted that all information or opinion about you as an identified, or reasonably identifiable, individual (that is in the Company's control) is handled and managed with the utmost confidentiality by the Company.

1. About BTC's privacy policy

This privacy policy explains how we collect, hold, use, disclose, secure and otherwise manage your personal information. 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. This Policy applies to BTC Health Limited and its affiliates (BTC or Company). The Privacy Officer is the Company Secretary of BTC Health Limited.

2. 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.

3. What personal information do we collect and hold?

Your Personal information is collected by BTC only when knowingly and voluntarily submitted. For example, we may need to collect information to provide you with our services or to answer or forward any requests or enquiries.

Personal Information

Personal information which may be collected by BTC includes, but is not limited to the following:

- a) Contact details including name, telephone number, address, email, phone number
- b) Qualifications, area of specialty and research interests/expertise
- c) Workplace information (e.g. research institute, hospital, university, specialist practice)
- d) Financial information, including bank details, superannuation, tax file number
- e) Personal details such as gender, age, date of birth, next of kin, signature, photo
- f) Employment information such as salaries and wages, education/employment history, curriculum vitae
- g) Business details such as TFN, ABN, contact details (including phone, mobile, email)
- h) Other information that is needed to provide our services

4. Collection of Information

In performing the company's business activities BTC may collect personal information that relates to employees, contractors, consultants, external providers, patients, doctors, customers, clients and the wider community.

The Company may collect personal information where you:

- a) contact us, through telephone, video call solutions or through our websites to utilise any of our facilities or services or information;
- b) use our websites, such as filling our enquiry forms, server log information (IP address, browser type, operating system, browser language, time zone, access times and any referring addresses) and location information;
- c) deal with us as part of managing our day-to-day business activities;
- d) as part of providing our products and services to you;
- e) as part of us procuring services from you, or your provision of such services on our behalf;
- f) are a current, former, or potential employee or contractor;
- g) make an enquiry or complaint to us; or
- h) have provided your consent for any other purposes or if there is another lawful basis for doing so.

When collecting information, BTC takes reasonable steps to make an individual aware of the following:

- a) BTC's contact details;
- b) The fact that the individual can access their information;
- c) The purpose for collecting the information and to whom it would normally be disclosed to;
- d) Whether the disclosure is required by law.

The main consequences of not providing that information is that it might impact upon BTC's capacity to deliver a quality service.

5. Method of Collection of Personal Information

From you

Personal information may be collected when you contact the Company or its service providers by telephone, by email, through the Company's websites or when you complete a form or document and provide it to the Company.

From Third Parties

BTC may also collect information about you from other people (e.g. patient's doctor or nurse) or independent sources. For example, the Company may collect personal information about you from its services providers, including the Company's share registry. 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.

From the Company's website

BTC may collect information based on how you use their websites 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 websites, its marketing campaigns and to record statistics on web traffic.

No attempt is made by BTC 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.

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

Unsolicited Information

If BTC 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.

6. Use of Personal Information

The main purposes in collecting personal information about individuals are:

- a) To provide our services;
- b) To respond to an individual's request;
- c) To maintain contact with clients;
- d) 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 offerings, seminars and other events we are holding;
- e) For the management and reporting of adverse events on behalf of our clients;
- f) For general management and reporting purposes, such as invoicing and account management;
- g) For recruitment purposes;
- h) For purposes related to the employment of our personnel and providing internal services to our staff; and
- i) All other purposes related to our business.

BTC may use personal information about individuals to market services, including by email. However, individuals always have the opportunity to elect not to receive further marketing information by writing to or by emailing us.

If BTC collects or uses personal information in ways other than as stated in this policy, BTC will ensure it is undertaken pursuant to the requirements of the Privacy Act.

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.

7. How is personal information disclosed to others?

BTC does not sell, rent or trade personal information to, or with, third parties.

The Company's websites may contain links to other websites. BTC does not share your personal information with those websites and it is not responsible for their privacy practices. 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.

In some circumstances your personal information may be disclosed to service providers that perform a range of services on behalf of the Company such as the Share Registry,

BTC and its related entities may exchange personal information. As a result, BTC may transfer personal information outside Australia to countries whose privacy laws do not provide the same level of protection as Australia's. BTC may need to exchange information to overseas facilities or contractors to process or back-up our information or to provide certain services to us. As a result, we may transfer personal information to overseas facilities or contractors for these purposes.

However, any such transfer of information does not change any of BTC's commitments to safeguard privacy and the information remains subject to existing confidentiality obligations.

8. Disclosure of Personal Information

Personal information collected and held by BTC will only be accessed and handled by personnel authorised to do so, for the purpose of carrying out their duties. Apart from the exceptions listed below, BTC will only use or disclose information for the purpose for which it was collected.

BTC 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:

- a) The secondary purpose is related to the main purpose of collection and the individual would reasonably expect BTC to use or disclose the information for the secondary purpose
- b) The individual has consented to the use or disclosure
- c) The use or disclosure is permitted or authorised by Privacy Laws
- d) After notification, the Privacy Officer reasonably believes that the use or disclosure is necessary to lessen or to lessen or prevent either:
- e) A serious and imminent threat to an individual's life, health, safety or welfare, or
- f) A serious threat to public health, public safety or public welfare.

Employees and contractors are prohibited from disclosing information about or undertaking transactions on behalf of a customer, surgeon or patient, without the individual's authorisation. This includes disclosure of information to and transactions with partners, relatives, friends or organisations.

9. 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:

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

Personal information is retained for the period of time determined by applicable Australian laws after which it is de-identified or disposed of in a secure manner

10. Access

BTC's privacy policy can be obtained by contacting the Privacy Officer. Personal information held by BTC may be accessed or corrected by the individual to whom the information belongs. For corrections, the Privacy Officer should be contacted in writing by email or mail. When an individual makes a request to access personal information, BTC will require them to provide some form of identification (such as a driver's licence or passport) so that BTC can verify that they are the person to whom the information relates.

11. How do we keep personal information accurate and up-to-date?

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 by contacting us on the details below.

However, the accuracy of that information depends largely on the quality of the information provided to us. We therefore suggest that individuals:

- a) let us know if there are any errors in their personal information; and
- b) keep us up-to-date with changes to their personal information (e.g. their name and address). Individuals may do this by mail or email using the information provided below. There may be circumstances in which we may have to refuse a request for correction. If this happens, we will notify the individual in writing of our reasons for the refusal and explain how they can complain if they are not satisfied.

12. Complaints or Enquiries

Any complaints about BTC's handling of personal information or enquiries about this policy are to be directed to the Company Secretary.

The Company Secretary

BTC Health Limited

Level 1, 10 Oxley Road, Hawthorn VIC 3122

Email: sbalak@btchealth.com.au

Phone: 1800 100 282

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 to have the complaint heard and determined.

For more information about privacy issues in Australia and protecting your privacy, visit the Australian Federal Privacy Commissioner's web site. <http://www.privacy.gov.au/>

13. Policy review and amendments

The Policy will be reviewed once every 2 years or as often as necessary to ensure it remains effective and relevant.



The Board is responsible for approving the Policy and may make changes from time to time by resolution.

The Policy will be available on the Company's website within a reasonable time after any such updates or amendments have been approved.