

PRIVACY POLICY

FOR THE PROTECTION OF PERSONAL
INFORMAITON

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Introduction

Calceus Health Pty Ltd recognises that the personal information it receives is held in a position of trust. We seek to fulfill that trust by adhering to general principles regarding the protection of personal information.

This Privacy Policy explains how we collect, use, share and protect information in the course of operating our business. This Privacy Policy applies to the personal information of consumers that is collected or used by Calceus Health Pty Ltd. This Policy applies to all the personal information that we collect when consumers interact with us, such as when visiting our website, using or purchasing our products or services, contacting customer service and when interacting with us as a business customer, supplier or business partner.

We will handle any personal information that we collect in accordance the Australian Privacy Principles. The Australian Privacy Principles (“APPs”) ensure that your personal information is managed in an open and transparent way. The APPs grant you a right to:

- ◆ Access any of your personal information that we hold;
- ◆ Correct your personal information;
- ◆ Complain about a breach or perceived breach of your rights.

To enforce any of these rights, contact Calceus Health Pty Ltd at the following address: support@calceushealth.com.au.

Collection of Personal Information

Calceus Health Pty Ltd may ask you to provide personal information for purposes including, but not limited to, the following:

- ◆ Buying Calceus Health Pty Ltd products and services;
- ◆ Activating or registering certain products and services or enhancing functionality;
- ◆ Receiving information about Calceus Health Pty Ltd products and services;
- ◆ Participating in Calceus Health Pty Ltd online communities, including our social media channels/pages;
- ◆ Storing your preferences for future interactions and communications from Calceus Health Pty Ltd;
- ◆ Helping us to develop products and services and create campaigns that are designed around you, optimise customer services and continuously improve our websites;
- ◆ Helping us to improve products and services, and allowing Calceus Health Pty Ltd to keep you informed of, or involve you in the testing of, new products and services;
- ◆ Resolving consumer and/or product and services issues;
- ◆ Contract or tender management; and
- ◆ Receiving personalised messages, special offers and advertisements that are relevant to your personal interests, based on the information you have shared with us and on the information we have collected through cookies or similar techniques regarding your use of the Calceus Health Pty Ltd websites/social media/blogs.

Calceus Health Pty Ltd maintains physical, technical, and administrative safeguards to protect your personal information and only allows disclosures as permitted by law to assist in providing products or services. We may also collect product and service information and provide these statistics to others in an aggregate form where the information has been de-identified.

Personal information collected may include:

- ◆ Contact information, such as name, address, email, telephone number, fax number, organisation name, and/or job title;
- ◆ Unique identifiers and preference information such as username, password, marketing preferences, internet protocol (IP) address, browser type, operating system, computer or mobile device, or navigation and clickstream behaviour for online interactions;
- ◆ Pictures, video and audio recordings where you have provided your permission;
- ◆ Sensitive information, such as health information or reports of an individual (e.g. concerning product claims and investigations or patient outcomes for research & statistical purposes in accordance with applicable law).

If you are a healthcare professional, additional Personal Information we may collect includes:

- ◆ Your medical specialty;
- ◆ Your clinical interests.

If you are a patient, additional Personal Information we may collect includes:

- ◆ Details of your healthcare professional;
- ◆ Your treatment details and history;
- ◆ Product data, such as model, serial number and usage of your device;
- ◆ Product performance, service and reliability data;
- ◆ Therapy related data which you provide to Calceus Health Pty Ltd or authorize Calceus Health Pty Ltd to collect from your device;
- ◆ If there are any specific products you may want to learn about;
- ◆ Credit related information.

Use of Personal Information

Calceus Health Pty Ltd will use your Personal Information for the primary purpose for which it is collected, which generally includes the following purposes:

- ◆ During the sale, distribution or provision of medical devices, apps or services that have been requested by you or your healthcare professional;
- ◆ While supporting you and your healthcare professional or other care partners (as authorised by you) in your ongoing care, if you are a patient;
- ◆ Administering training programs, clinical trials or other similar programs in which you agree to be involved;

- ◆ Compliance with regulatory requirements, such as maintaining a record of medical queries, complaints, adverse events and recalls relating to our products.

We may also use your Personal Information to:

- ◆ Provide you with updated product or safety information with respect to Calceus Health Pty Ltd medical devices, apps and services;
- ◆ Send you material on our activities and products or developments in medical technology that Calceus Health Pty Ltd believes may be of interest to you (although if you are a patient we will not do so without your consent);
- ◆ Respond to your requests for information, product, services including managing your online accounts and providing warranty service where this applies to products;
- ◆ Provide you with general health information, where this is permissible, such as information about certain health conditions, as well as information about our products and services;
- ◆ Resolve or track the status of all problems with consumers and / or products or services;
- ◆ Manage, plan and arrange meetings between you and Calceus Health Pty Ltd representatives;
- ◆ Generate customer lists for the purposes of market research;
- ◆ Manage accounts and ensure that we receive payment for our products;
- ◆ Verify your age or identity as needed for us to provide our products and services safely and lawfully;
- ◆ Improve our products, services and overall therapy management;
- ◆ De-identify your information by removing all personal identifiers (your name, e -mail address etc.) so that the information is no longer Personal Information and can be used for other purposes;
- ◆ Protect someone's health, safety or welfare;
- ◆ Comply with a law or regulation, court order or other legal requirement;
- ◆ Undertake other activities for which you have consented we can use or disclose your Personal Information.

Sometimes we may collect Sensitive Information if you disclose it to us, or as part of providing services to you. When dealing with Sensitive Information, such as your health information, for a purpose that is not directly linked to the primary purpose of collection, Calceus Health Pty Ltd will generally seek your consent before using Sensitive Information.

Disclosure of Personal Information

Australian privacy law allows an organisation or agency to use or disclose your personal information for the reason they collected it (the primary purpose), including for direct marketing activities.

We may disclose Personal Information:

- ◆ To third party service providers engaged by us so that they may perform services for us or on our behalf;
- ◆ To third party service providers engaged directly by your healthcare professional, so that they may perform services for your healthcare professional or on their behalf;
- ◆ If you are a patient, to care partners who you nominate to receive information and notifications about you and your care from Calceus Health Pty Ltd;
- ◆ Where we are authorised or required by law to do so or are permitted to disclose the information under the Australian Privacy Laws;
- ◆ If you have expressly consented to the disclosure or consent may be reasonably inferred from the circumstances.

We will only use or disclose your Personal Information for a purpose that was not the primary purpose for which we collected it, if we are required, authorised or permitted by law or a court/tribunal order to do so.

In only very limited circumstances, such as where we are required by law to disclose information or in the event of a serious threat to your life or health, will we use or disclose your health information for other secondary purposes to the extent necessary in the circumstances without your consent.

Storage and Security of Personal Information

Calceus Health Pty Ltd has put in place safeguards to protect the Personal Information we hold from misuse, loss, unauthorised access, modification or disclosure. Calceus Health Pty Ltd evaluates these safeguards on an ongoing basis to help minimise risks from new security threats as they become known.

Calceus Health Pty Ltd generally holds the Personal Information you provide to us in an electronic form on computer servers, which are password protected for limited access and are located in controlled facilities. However, Calceus Health Pty Ltd may also hold Personal Information in physical form, such as in paper hard copies. While Calceus Health Pty Ltd cannot guarantee against any loss, misuse or alteration to data, we take security safeguards as are reasonable in the circumstances to prevent such occurrences.

Access to the Personal Information is restricted to those employees and service providers who need to use the data, who have been trained to handle such data properly and observe strict standards of confidentiality.

Calceus Health Pty Ltd destroys or permanently de-identifies Personal Information that we no longer need, where permitted. We will not keep Personal Information for longer than required for the purposes for which the information may be lawfully used or disclosed.

Access to Personal Information

Upon request, Calceus Health Pty Ltd will inform you of the type of personal information held about you. You have the right to access your personal information stored on computer, on a database or in any other form at Calceus Health Pty Ltd to ensure that it is accurate, unless Calceus Health Pty Ltd has a legal duty of confidentiality or non-disclosure.

If you would like to exercise your right to access your personal information, please contact Calceus Health Pty Ltd. It is our policy that all requests for access be made in writing. We will arrange for an access form to be sent to you and can assist with any enquiries you may have about the process. We commit to responding to a request by you to access your personal information within a reasonable period after the request is made.

Calceus Health Pty Ltd, in its discretion, may refuse to grant you access to their personal information to the extent that such denial is permitted by the Australian Privacy Principles. If Calceus Health Pty Ltd refuses your request to access their personal information under the Australian Privacy Principles, Calceus Health must, in writing:

- ◆ Where reasonable, give reasons for the refusal; and
- ◆ Notify you of the mechanisms to complain about the refusal; and
- ◆ Inform you of any other matter prescribed by the regulations.

You may always choose to object to the collection or use of your personal information or to have your information erased. If you would like a copy of the information held about you for your own use or to transfer to another party, or if you wish to exercise any other right, please contact us at support@calceushealth.com.au.

Currency of Personal Information

Calceus Health Pty Ltd will take all reasonable precautions to ensure that the personal information it collects, uses and discloses is accurate, complete and up-to date. However, the accuracy of that information depends to a large extent on the information provided by the individual. In order to prevent inaccuracies in personal information you should:

- ◆ Let Calceus Health Pty Ltd know if there are any errors in your personal information; and
- ◆ Keep Calceus Health Pty Ltd up to date with any changes to your personal information.

There is no charge for requesting access to your Personal Information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs).

Correcting Personal Information

A customer may contact Calceus Health Pty Ltd to correct any personal information that is inaccurate, out of date, incomplete or to request that personal information be deleted. A customer can contact Calceus Health Pty Ltd at support@calceushealth.com.au.

If Calceus Health Pty Ltd is satisfied that a customer's personal information is inaccurate, out-of-date, incomplete or irrelevant, or if a customer requests Calceus Health Pty Ltd to correct their personal information, then Calceus Health Pty Ltd will take reasonable steps to correct the customer's personal information to ensure that, having regard to the purpose for which it is held, it is accurate, up-to date, complete and relevant.

- ◆ Calceus Health Pty Ltd will respond to a request by a customer to correct their personal information within a reasonable period after the request is made;
- ◆ Calceus Health will not charge a fee for the making of the request or for correcting personal information.
- ◆ If Calceus Health has previously disclosed a customer's personal information to another entity, Calceus Health will take reasonable steps to notify the other entity of the correction (unless it is impracticable or unlawful to do so) if a customer makes such a request.
- ◆ There are some circumstances in which we are not required to give you access to your Personal Information. Calceus Health Pty Ltd may not accommodate a request to access, change or delete Personal Information if it believes doing so would violate any law or legal requirement, or cause the information to be incorrect. If Calceus Health refuses a customer's request to correct information, Calceus Health Pty Ltd will, in writing:
 - ◆ Give reasons for the refusal except to the extent it would be unreasonable to do so; and
 - ◆ Notify the customer of the mechanisms available to complain about the refusal; and
 - ◆ Inform the customer of any other matters prescribed by the privacy regulations.

Cookies

A Cookie is a feature stored on a computer's hard drive by your web browser. Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored on your device either temporarily for that session only or permanently on the hard disk (persistent cookie) and allows the website or a third-party to recognize you and make your next visit easier and the features more useful to you.

On each visit to the Website, the Calceus Health Pty Ltd web browser will recognise the Cookie and give us information about your visit.

Our website uses cookies which are necessary for the functioning of the website by default. These cookies cannot be removed, or the website won't work. We call these "Essential". There are also other cookies we use that are not strictly necessary for operating this site, which you can block by changing your browser settings or alternatively choose to not continue browsing the site.

Calceus Health Pty Ltd uses Cookies for the purpose of allowing an individual to have their password saved for easy repeated access to the website.

Calceus Health Pty Ltd may also use Cookies to learn about an individual's preferences and the way that they use the Website, so that it can improve the Website.

Most browsers accept Cookies automatically, but you should also be able to alter the settings of the browser to refuse Cookies. You should note that de-activating Cookies may mean that you may no longer be able to enjoy the full operational capabilities of the Website.

Making a Complaint

If you are concerned that Calceus Health Pty Ltd may have handled your personal information inappropriately or if you have a complaint regarding your privacy, you may contact support@calceushealth.com.au.

Upon receipt of the complaint, Calceus Health Pty Ltd will handle the complaint in accordance with its Complaints Handling Policy. This requires Calceus Health to:

- a) Confirm receipt of the complaint;
- b) Advise the complainant what steps will be taken to investigate their complaint;
- c) Provide an approximate timeframe within which the complaint will be resolved;
- d) Make a decision in relation to the complaint; and
- e) Inform the complainant of the outcome of the complaint and the reasons for the decision.

In response to any complaint, Calceus Health Pty Ltd will:

- a) Treat all complaints sensitively, seriously and sympathetically;
- b) Attempt to resolve the matter promptly;
- c) Keep accurate records of the complaint, Calceus Health's investigation of the complaint and the outcome reached.

Definitions

Term	Definitions
Privacy	The handling of personal information. This includes the collection, use and disclosure of personal information, an organisation or agency's governance and accountability, integrity and correction of personal information and the rights of individuals to access their personal information.
Personal Information	The Privacy Act defines personal information as information or an opinion about an identified individual, or an individual who is reasonably identifiable: whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.
Sensitive Information	<p>Sensitive information is a special category of personal information that attracts special protection. It is treated separately from personal information. The Privacy Act defines sensitive information as information that may result in discrimination or harm if it is mishandled. Sensitive information includes:</p> <ul style="list-style-type: none"> ◆ Racial or ethnic origin ◆ Political opinions or associations ◆ Religious or philosophical beliefs ◆ Trade union membership or associations ◆ Sexual orientation or practices ◆ Criminal record ◆ Health or genetic information ◆ Biometric information, which is an electronic copy of your face, fingerprints, iris, palm, signature or voice.