

Privacy

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Related Policies and Procedures:	Grievance Policy Code of Conduct Confidentiality

POLICY

CHEMCENTRAL'S COMMITMENT TO PRIVACY

ChemCentral Group Pty Ltd and its subsidiaries and affiliates in Australia (collectively referred to as ChemCentral) recognise the importance of protecting personal information which they may collect from individuals.

ChemCentral is committed to managing personal information in accordance with the Australian Privacy Principles under the Privacy Act 1998 (Cth) and in accordance with other applicable privacy laws.

This Privacy Policy sets out our policies for managing your personal information.

For the purpose of this Privacy Policy:

- "We" and "Us" refers to ChemCentral and "you" refers to any individual about whom we collect personal information.
- "personal information" means information relating to an individual (including an opinion), which may be provided to ChemCentral either in material form or not, and whether true or not. Such information may personally identify an individual or make the person's identity reasonably apparent.
- "sensitive information" is a type of personal information and refers to information (including an opinion) about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual practices, criminal record or health information.

ABOUT CHEMCENTRAL

ChemCentral operates a group of pharmacies under the brand "Chemist King", "Amcal" and "All Care Pharmacy". Our pharmacies offer a complete range of pharmacy services including the sale of health and beauty products.

WHAT INFORMATION DOES CHEMCENTRAL COLLECT ABOUT YOU

We will only collect information relevant to our relationship with you including the following types of personal information:

- Name;
- Mailing or street address;
- Email address;
- Telephone number
- Profession, occupation or job title;
- Information you provide to us directly through our websites or social media;
- Information you provide to us through our customer service centre;

The type of information we collect will depend on our relationship with you:

(a) Customers and prospective customers

To help meet our customer's health care needs, in addition to the types of information set out above, we may also collect, hold and use medication records and other health care information that the treating doctor or other health practitioner may need to provide to us. Medication records and other health care information will be used only for the purposes of meeting health care needs, unless you consent to their use for other purposes, or the law permits their use for other purposes.

Much of the information we ask for is because the law requires it to be collected. For example, the law requires us to collect personal details contained in prescriptions (which is where we get most of our information about our customers) and, in some jurisdictions, we are required to collect some information like driver's licence numbers when supplying medicines containing pseudoephedrine.

(b) Our employees, associates and subcontractors

We may obtain personal information for the purposes of recruitment, employment or engagement which may include contact details, emergency contacts email and/or other information related to the duties to be performed.

(c) Other Individuals

We may collect personal information about individuals who are not customers, employees, associates or subcontractors. This includes members of the public who participate in events or surveys operated by us. The kinds of personal information we collect will depend on the capacity in which such individuals are dealing with us but generally it would include contact details and information regarding our interactions with you.

Customers and other individuals can decline to give us any personal information we request, but that may mean we are unable to provide you with some or all of the services you have requested or you will be unable to participate in events, programs or activities we manage or deliver.

HOW DOES CHEMCENTRAL COLLECT INFORMATION

We will collect information directly from you by phone, face to face, by email, via our website or on social media. We may also collect information from third parties including credit reporting agencies, and law enforcement agencies.

WHY DOES CHEMCENTRAL COLLECT PERSONAL INFORMATION AND HOW DO WE USE IT

We collect personal information reasonably necessary for us to carry out our business, including information to allow us to assess and manage our customers' needs.

The purposes for which we usually collect and use personal information depends on the nature of your interaction with us and the services we are providing, but such purposes may include:

- supplying and administering our products and services (including billing and collecting debts);
- providing our customers and prospective customers with information about us and our products and services;
- gaining an understanding of our customers' needs in order to provide better products and services and maintain our high levels of customer service;
- ensuring safety at our sites;

- conducting research and development, including market research into how to innovate our delivery of products and services;
- monitoring and improving quality control;
- conducting appropriate checks for credit-worthiness and for fraud;
- complying with our legal and regulatory obligations;
- managing our relationships with our suppliers and stakeholders;
- considering job applicants for current and future employment;
- training staff, contractors and other workers;
- responding to enquiries and complaints regarding our services;
- obtaining advice from consultants and other professional advisers; and
- responding to subpoenas and other legal orders and obligations

We may disclose and use your personal information for other purposes explained at the time of collection or otherwise as set out in this Privacy Policy.

Some activities such as Medication Management services or research activities will have privacy practices and consent forms specific to the activity. If we are part of the team involved in that activity, we are required to meet our privacy obligations for that activity whether they arise under the Privacy Act or otherwise.

We may need to give personal information to other organisations to comply with our legal obligations (such as the Australian Taxation Office) or for other purposes required or authorised by or under law (including purposes for which you have provided your consent).

We may also need to disclose information to third parties we engage such as sub-contractors or other select organisations who perform certain functions or operations for us including web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, debt collections and professional advisors such as accountants, solicitors, business advisors, other health service providers (if it is necessary to help us to provide services to you), and consultants. Your information may be provided to them on a confidential basis for the sole purpose of performing the contracted services on our behalf.

Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

DOES CHEMCENTRAL USE OR DISCLOSE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING

We may use or disclose your personal information (excluding any sensitive information) for the purpose of sending you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

If you do not want to receive direct marketing communications you can opt-out at any time by contacting us using our contact information below or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We may also share your personal information with related companies in the ChemCentral group, who will exercise similar standards of care in relation to your information.

PERSONAL INFORMATION OBTAINED THROUGH OR VIA OUR WEBSITE

You may visit our website (<https://www.chemistking.com.au>) without identifying yourself. If you identify yourself (for example by providing your contact details in an enquiry), any personal

information you provide to ChemCentral will be managed in accordance with this Privacy Policy.

In some cases, we may also collect your personal information through the use of cookies. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. Our cookies do not collect personal information, but they do enable us to recognise your computer and keep track of products or services that you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns in the aggregate. We use this to research our visitors' habits so that we can improve our online products and services. We may log IP addresses to analyse trends, administer the website, track users' movements, and gather broad demographic information.

HOW DOES CHEMCENTRAL STORE PERSONAL INFORMATION AND KEEP IT SECURE

We store some information in paper-based files but the majority of information is stored electronically in secure password protected databases. ChemCentral maintains physical security over paper and electronic data stores. We maintain computer and network security, for example, we use firewalls and other security systems such as passwords to control access to our computer systems.

We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

We take steps to securely destroy or de-identify personal information that we no longer require.

DOES CHEMCENTRAL DISCLOSE PERSONAL INFORMATION OVERSEAS

We do not disclose personal information to overseas recipients as part of our operations.

We will only disclose your personal information to overseas recipients with your consent or if an exception under the Australian Privacy Principles applies.

HOW CAN YOU ACCESS OR CORRECT YOUR PERSONAL INFORMATION

You are entitled to access your personal information held by us. To request access to your personal information please contact our privacy officer using the contact details set out below.

There is no charge for lodging a request to access your information, however we may make a small charge for our time involved in providing this information and for associated costs such as photocopying.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request we will provide you with a reason for our decision.

WHAT SHOULD YOU DO IF YOU HAVE A COMPLAINT ABOUT OUR HANDLING OF PERSONAL INFORMATION

You may contact us if you have any questions or concerns about the Privacy Policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to the privacy officer at the contact details set out below.

The privacy officer will first consider your complaint to determine whether there are immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.

If your complaint requires more detailed investigation we will acknowledge receipt of your complaint within a week and provide you with an estimate of how long we expect the investigation will take.

In most cases we will investigate and respond to a complaint within 30 days of receipt of the complaint.

If you are not satisfied with our response or you consider that we have breached the Australian Privacy Principles or the Privacy Act a complaint may be made to the Office of the Australian Information Commissioner (www.oaic.gov.au, 1300 363 992).

INTERNAL BREACHES OF THIS PRIVACY POLICY

Employees and Associates who are in breach of this Privacy Policy will be dealt with in accordance with the related policies and disciplinary processes and may result in the termination of employment or engagement.

Chemist King has an expectation of all employees and sub-contractors that they will preserve the privacy of information relating to their work colleagues and to our customers. Personal information learned about another individual during the course of work, must not be used or disclosed except as necessary to fulfil the legitimate requirements of the job.

Staff or associates who may have any queries or may be aware of any breaches should report the matter to their direct line manager, Privacy Officer (where applicable) or Pharmacist immediately.

HOW ARE CHANGES MADE TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes.

HOW CAN YOU CONTACT US

If you have any questions about this Privacy Policy, if you wish to update or access the information we hold about you, or if you wish to make a related complaint, please contact the Chemist King Privacy Officer Representative via email: michael.auciello@chemcentral.com.au.