

# beHub Privacy Policy

In this Privacy Policy, 'us' 'we' or 'our' means beHub Health Pty Ltd ACN 659 345 552 and our related bodies corporate. We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your personal information. We are bound by the Australian Privacy Principles contained in the Privacy Act.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details.

## What personal information do we collect?

The kind of personal information that we collect from you will depend on how you use our website or our products and services.

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number and other contact details;
- mobile number, place of employment, position (role) & department in which you work;
- age or date of birth;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any other information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information;
- information you provide to us through customer surveys; or
- any other personal information that may be required to facilitate your dealings with us.

## How do we collect personal information?

We may collect these types of personal information either directly from you or third parties. We may collect this information when you:

- register on our website or use our products and services;
- communicate with us through correspondence, chats, email, or when you share information with us from other social applications, services or websites;
- interact with our sites, services, content and advertising; or
- invest in our business or enquire as to a potential purchase in our business.

Also, when you apply for a job or position with us, we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

## **Why do we collect, use and disclose personal information?**

We may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use our website, product and services and any apps we provide.
- to operate, protect, improve and optimise our website, product and services and any apps business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and the information requested by you;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by our business partners or us;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties;

## **Third-Party Service Providers**

We collaborate with selected third-party companies and individuals, referred to as "Service Providers," to perform specific services on our behalf or to complement our own services. These may include providers engaged in activities related to our platform, such as hosting and server co-location services, data and cybersecurity services, communication and content delivery, billing and payment processing, fraud detection and prevention, analytics tracking, email and communication distribution through platforms like MailChimp or SendinBlue, and consultation with legal, compliance, and financial advisors and auditors.

Our Service Providers may have access to personal information, including information related to Health Professionals, Medical Device Manufacturers & Distributors, and their representatives, as required for their specific roles in facilitating and enhancing our services. This access is strictly governed by our agreements with them, ensuring that the information is used solely for the purposes aligned with our primary purpose of providing product information, technical data, training, and education material for medical devices, and any associated support services. Any use or disclosure of personal information by our Service Providers will be in accordance with this Privacy Policy and applicable Australian privacy laws, including obtaining necessary consents and providing appropriate safeguards.

## **Do we use your personal information for direct marketing?**

We and/or our carefully selected business partners may send you direct marketing communications and information about our services or products. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (e.g. an unsubscribe link).

## **To whom do we disclose your personal information?**

We may disclose personal information for the purposes described in this privacy policy to:

- our employees and related bodies corporate;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
- professional advisers, dealers and agents;
- payment systems operators (e.g. merchants receiving card payments);

- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us;
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law;
- to comply with applicable laws and regulations, including to investigate an unlawful activity;
- in our opinion, necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety; and
- in our opinion, necessary to identify, contact or bring legal action against anyone damaging, injuring, or interfering (intentionally or unintentionally) with our rights or property, users, or anyone else who could be harmed by such activities.

## **Disclosure of personal information outside Australia**

Your personal information will not be disclosed to recipients outside Australia unless you expressly request us to do so. If you request us to transfer your personal information to an overseas recipient, the overseas recipient will not be required to comply with the Australian Privacy Principles and we will not be liable for any mishandling of your information in such circumstances.

Despite our security measures and using AWS servers in Australia, there is always a risk that data could be transferred outside of Australia. This could happen if there is a security breach, or if a customer explicitly requests that his or her personal data be transferred.

## **Using our website and cookies**

We may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other devices. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser, but our websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

## **Security**

We take appropriate security measures to protect your personal information, and our platform is built on ISO27001/17 certified standards. Using AWS servers in Sydney and Perth, we ensure that your data is stored securely. Information is deleted one month after your account is terminated.

## **Links**

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

## **Accessing or correcting your personal information**

You can access the personal information we hold about you by contacting us by email [here](#). Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.

If you think that any personal information, we hold about you is inaccurate, please contact us, and we will take reasonable steps to ensure that it is corrected.

## **Making a complaint**

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us [Complaint](#). Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

## **Contact Us**

For further information about our Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

PO BOX 782 Wahroonga, NSW 2076

Email - [here](#)

**Effective:** November 2020