

## PRIVACY POLICY

### INDEPENDENT PHARMACIES OF AUSTRALIA GROUP (IPA) AND THE SCOPE OF THIS PRIVACY POLICY.

This Privacy Policy sets out how Independent Pharmacies of Australia Group Pty Limited ABN 73 609 137 546 (IPA) and its subsidiaries, including Pharmacy Alliance Pty Ltd ABN 92 103 792 310, Pharmacy Platform Pty Ltd ABN 53 105 944 321, Advantage Pharmacy Pty Ltd ABN 73 092 158275, Chemist Discount Centre Services Pty Ltd ABN 46 160 755 439, Pharmacy Catalyst Pty Ltd, ABN 79 127 111 773, Exsell Australia Pty Ltd, ABN 65 146 728 323, Eyes Lips Face (Australia) Pty Ltd ABN 85 146 211 163, BuyItRight Pty Ltd (ABN 81 629 019 405), and Magikos Marketing Pty Ltd (ABN 90 168 307 640) trading as Knowitall Loyalty Systems manage and treat Personal Information in the course of the IPA business activities.

The activities of the Independent Pharmacies of Australia Group (IPA) include providing various services and benefits to support pharmacies, whether as independent pharmacies or pharmacies trading under the independent Pharmacies of Australia Group and its subsidiary trademarks, (including under franchise arrangements). These services include providing access to discounts and rebates relating to the purchase of pharmaceutical and other products, marketing support (including marketing support for clinics run by pharmacies under the EasyClinic brand), providing access to purchasing technology systems, business analytics support and access to loyalty programs for pharmacy customers. These loyalty programs are known as Healthy Rewards for Alliance Pharmacies, LifeClub for Catalyst members, Club Card for Chemist Discount Centre Pharmacies, A-List for Advantage Pharmacies and My Pharmacy Rewards for IPA independents.

Chemists Discount Centre Services Pty Ltd and Independent Pharmacies of Australia Group Pty Ltd also operate an online site where consumers can place orders for various products, including prescriptions. This online platform facilitates the purchase of products from franchisee and pharmacy partners operating under several brands: Chemists Discount Centre, Alliance Pharmacy, Advantage Pharmacy, and other pharmacies supported by IPA.



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The pharmacies that the IPA support (including franchisee pharmacies) may operate under various brands or trademarks licensed to them by entities within the IPA Group, including “Advantage”, and “Chemist Discount Centre” and “Alliance Pharmacy”. However, those pharmacies are not owned by IPA, and for the purposes of this Privacy Policy are not considered part of the IPA Group. If you have any concerns about Personal Information you have provided to your pharmacy outside of any loyalty program, you should contact them directly.

## Definitions

**Personal Information** generally means information or opinions about an individual who is reasonably identifiable from that information. Personal Information includes Health Information, Sensitive Information and Credit Information.

**Health Information** includes information or opinions about the health of a person or health services provided to them.

**Sensitive Information** includes information or opinions about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, as well as Health Information, genetic information and biometric information.

**Credit Information** includes the type and amount of credit being sought in a credit application, repayment history information about an individual, payment information about an individual and default information about an individual.

Terms are more fully defined in the Privacy Act.

**What types of Personal Information does the IPA Group collect, how is it collected and for what is it used?**



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## Pharmacy customers

Members of the IPA Group collect your Personal Information whether you are an individual that owns a pharmacy or an employee of a pharmacy business. The Personal Information collected includes your name, contact details, how you wish to be contacted, notes of our calls and communications with you, areas of your interest (including your professional interests), details of your business (including your purchasing and (deidentified) dispensing patterns), bank account and credit card details), survey information and feedback provided by you.

This Personal Information is generally collected directly from you when we first contact you during our business relationship with you. The information is used for the purpose of facilitating and improving our business relationship with you as a customer, including providing you with the benefit under any contracts we have with you (or your employer). Failure by you to provide Personal Information that we seek may hamper our ability to provide you with the optimum services and benefits that you may ordinarily be entitled to.

## Consumers

In limited circumstances, members of the IPA Group offer therapeutic goods directly to you as a consumer. When we do so we collect your contact details, delivery address and details to facilitate payment of the purchase. These details are collected directly from you when you make your purchase. This Personal Information is used to facilitate the purchase and the delivery of your goods. Any failure to provide the relevant information may result in your purchase not being finalised.

The type of personal information collected by the IPA Group depends on the type of transaction you undertake with us. This could include: your name, contact details, other identifying information such as date of birth or gender; information about you that you give us when you complete application forms, make inquiries or purchase goods or services from us (which may include Health Information such as a prescription); and information that we are required by law to collect. We typically seek to collect information relevant to the purpose for which it is collected. For example, if you book a place in, or attend, a health clinic or other event, then information relevant to your



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participation in the event will be collected. If you take part in a loyalty program, then information relevant to your participation in the program will be collected (this may include your preferences relating to the type of products you may be interested in).

### **Health professionals**

Where you are a health professional (such as a pharmacist) your contact details are collected when you provide us with queries or feedback in relation to products or pharmacovigilance information (i.e. the monitoring of medicines and other therapeutic goods). This type of Personal Information is generally collected directly from you when you contact us. Your contact information is used for follow-up activities, including those that are part of standard Pharmacovigilance activities. The failure to provide us with such Personal Information or to consent to the disclosure of this information to our suppliers and distributors (see below) may result in the failure to properly investigate and follow-up on such reports.

If you are a health professional and provide IPA Group with Health Information of your patients. IPA expects that you obtain your patient's consent before disclosing their Health Information to us. The details of your patient may be deidentified where we are not satisfied that you have obtained that consent.

### **Business associates and contractors**

The IPA Group collects your Personal Information if you own, or work for, a business associate or contractor of an IPA Group member. This information generally consists of contact information and is generally collected directly from you or from your employer. Your Personal information is used for the purposes of facilitating the business relationship (including as contemplated under any contract). Failure to collect such information may hamper our ability to communicate with you.

### **Potential Employees**

The IPA Group also collects Personal Information from individuals shortlisted as applicants for a position within the IPA Group. Where you have applied for a position as an employee, your name, contact details, curriculum vitae, professional experience,



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and other associated information are collected either through a service provider or directly from you. This Personal Information is used for assessing your application for employment. In some cases, this information is retained for consideration for any future employment positions.

We may also disclose your Personal Information in circumstances permitted by the Privacy Act.

### Disclosure of personal information

In certain circumstances, where you are a pharmacy customer or an employee of a pharmacy customer, your Personal Information is disclosed to our service providers to assist us in meeting and facilitating our obligations and services to you as a customer.

These include:

- those involved in providing, managing or administering a product or service you request;
- pharmacies who are the ultimate supplier of online products you may order;
- pharmacists or other health professionals, who may need to verify any Health Information you provide in connection with administering a prescription, product or service you request;
- loyalty program partners;
- organisations that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems or that assist with our product planning, research and development;
- mailing houses and telemarketing agencies who assist us to communicate with you;
- organisations that participate with us in payments systems including merchants, payment organisations and organisations that produce cards, cheque books or statements for us;
- other organisations involved in our normal business practices, including our related entities, agents and contractors and service providers;



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- any organisations that are involved in any proposed transfer or sale of our business or assets;
- any entity to which we are required or authorised by or under law to disclose such in-formation and
- any other persons that you consent to us disclosing your information to (whether impliedly or expressly), including your guarantor or referee.
- Some of our service providers, such as Survey Monkey and JotForm hold such Personal Information on servers located in the United States.

If you elect to participate in any promotions, competitions, sweepstakes, surveys, questionnaires or other events, the rules or terms and conditions for those events may include your agreement to your Personal Information being shared with third parties. By choosing to participate and submitting your Personal Information in that manner, you consent to disclosure of your Personal Information to such third parties in accordance with those rules or terms and conditions.

### **Credit Information**

Members of the IPA Group may collect your Credit Information if you are a pharmacy owner or an individual guarantor of a pharmacy business, to assess any application for credit. The types of information collected include your name, contact information, the name and contact details of any of your business partners, the name and ABN of your pharmacy business, your pharmacy registration number, your trading history, the credit being requested, the delivery address for goods and business references. In addition, we may obtain a Risk of Late Payment report. It is the general practice of the Group not to disclose any Credit Information to third parties.

### **IPA Group websites**

When you visit our websites or use other online resources or apps provided by any member of the IPA Group, we may collect information about your computer or electronic device (e.g. your Internet Protocol (IP) address, browser type, and date and time of your request) by using automatic systems of browsing data collection, such as cookies. A cookie is a file stored on your hard drive; it does not contain intelligible information, but it allows linking between a terminal and information about your





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preferences. These tracking technologies are used to provide additional functionality to your use of our resources; for example, to identify you as a healthcare professional, or to remember your preferences and selections. You may limit or remove cookies from your computer or device, but, in these situations, our ability to provide optimal service may be limited. By using any website of the IPA Group, you consent to the use and installation of these cookies and web beacons to provide you with these services.

By using websites, online resources, apps, or any other service of a member of the IPA Group, you also consent to the storage and handling of any Personal Information collected in accordance with this Privacy Policy or any update to it.

### **Storage and Security of Personal Information**

The IPA Group will take commercially reasonable steps to keep all Personal Information secure from misuse, interference, loss and unauthorised access. However, we cannot guarantee that third parties will never be able to defeat our security measures or use your Personal Information for improper purposes; for example, we do not control or monitor web sites to which we may provide a link. Our Privacy Policy does not apply to third-party websites.

Personal Information is stored on secure servers that are protected in controlled facilities, or in hardcopy paper records stored in secure access facilities. The IPA Group requires its employees and data processors to protect the confidentiality of any Personal Information held by us.

### **Accessing your Personal Information**

If at any time you want to update or know what Personal Information (including Credit Information) the IPA Group holds, you are welcome to access your record by contacting the IPA Group using the details set out below. Your information will generally be made available to you within 30 days of receiving your request.

If you make such a request, you will be asked for identification so that we can verify your identity before providing you with your Personal Information. If you require Personal Information to be presented in an alternative format, we will make reasonable



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efforts to accommodate you. If there is an associated charge to us to retrieve your Personal Information, we will advise you of the charges that you would be responsible for and obtain your authorisation before proceeding.

We may not be able to give you access to Personal Information where such access would result in disclosure of other individuals' Personal Information, would result in a breach of a contract, or would result in disclosure of trade secrets or other proprietary business information belonging to IPA or a third party.

The IPA Group reserves the right to not provide access to individuals if the request for access is frivolous or vexatious, or falls into another relevant exception category, and we may impose reasonable charges for such access.

### **Amending or deleting your Personal Information**

The IPA Group will take reasonable steps to ensure Personal Information (including Credit Information) is accurate, up-to-date, and complete and notify you of any such changes. If you wish to update your Personal Information, please contact us to amend your record accordingly. Please note we cannot alter medical information generated as part of a clinical trial or study.

If you wish to have your Personal Information deleted, please contact us and we will take all reasonable steps to delete it. In circumstances where we are required to retain Personal Information, we may not be able to delete your Personal Information. Such circumstances may include, for example, where we are required to retain Personal Information by law or regulation, to continue to manage certain programs, to conduct clinical trials, to defend legal claims, or for certain necessary business purposes.

### **Contact us**

Please contact us if you have a complaint regarding IPA Group's compliance with this policy or any applicable privacy laws. The IPA Group will consider and respond to a complaint within a reasonable time frame. In addition, please contact us if you wish to discuss any privacy issues, have any concerns regarding your Personal Information or do not wish to receive any future communications from any member of the IPA Group.





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You can contact the IPA Group through the following means:

**By Post:**

Independent Pharmacies of Australia Group Attn: Privacy Officer  
15–17 Chapel Street  
Cremorne VIC 3121

**By e-mail:**

privacy@ipagroup.com (and specifying in the subject line “Privacy Policy”)  
By phone: 1300 001 724

The IPA Group’s commitment to being a leading provider of pharmaceuticals means its business will continue to evolve as new services and products are introduced. Because of this, from time to time, its policies may be reviewed and revised, and we reserve the right to amend or replace its Privacy Policy at any time. The IPA Group will notify you of any such changes by posting an updated version of the Privacy Policy on its website.

Should there be a discrepancy between this Privacy Policy and the applicable legislation at any time, the applicable legislation at that time will prevail.

