## **Privacy at Besins Healthcare Australia**

Besins Healthcare Pty Ltd ("Besins Healthcare Australia") recognises the importance of your privacy and understands that the security of your personal information is important to you. We are committed to protecting the personal information you provide to us. This privacy statement outlines how we generally manage your personal information and protect your privacy.

Besins Healthcare Australia is required to comply with the Australian Privacy Act 1988 (Cth) ("Privacy Act") and our privacy policy sets out how Besins Healthcare Australia seeks to ensure that any personal information we hold about you is collected, used, stored and disclosed in accordance with the Australian Privacy Principles in the Privacy Act. You can download a copy of our complete privacy policy here.

## **Accessing Besins Healthcare Australia's website**

You can access our websites without disclosing your personal information. You are not required to provide personal information as a condition of using our site, except as may be necessary to provide you a product, service or information, at your request. When you use our website, data may be collected in order to provide you with the information requested by you. This may include the name of your Internet service provider, the website that you used to link to our site, the websites that you visit from our site and your IP-address. Although this information could potentially lead to your identification, we do not use it to do so. Besins Healthcare Australia does use the data from time to time for statistical purposes, but maintains the anonymity of each individual user so that the person cannot be identified. In cases when personal information is provided to others to provide you products or services you have requested, or for other purposes you have authorised, we rely on technical and organisational means to assure that applicable data security regulations are followed.

## What personal information does Besins Healthcare Australia collect?

In the course of our business, Besins Healthcare Australia may collect personal information about you that is necessary for us to perform our business functions. The personal information collected by Besins Healthcare Australia may vary depending on the nature of our interaction with you and may include the items listed below. Please refer to our Privacy Policy for more specific details of personal information we collect.

#### **Healthcare Professionals:**

- Identification and contact information such as name, address, employment details, email address and mobile phone number;
- Information required to fulfil product orders;
- Professional association memberships;
- Information about attendance at events or programs organised or supported by Besins
  Healthcare Australia such as meetings, symposia, conferences, expert panels and other
  research, disease awareness or similar programs.

#### Suppliers:

- Bank account details if required for Besins to make payments to you
- Identification and contact information such as name, address, email address and mobile phone number.

#### Members of the public:

- Identification and contact information such as name, address, email address and mobile phone
  number if you contact us to inquire about or place an order for Besins' OTC products.
   Registration is not required to access information about OTC medicines on Besins' websites;
- Details about complaints and adverse events, which may include sensitive information such as health information and medical history.

We will retain control of and responsibility for the use of any personal information you disclose to us. Some of this personal information may be stored or processed in computers located in other jurisdictions, such as Europe and the United States, whose data protection laws may differ from the jurisdiction in which you live. In such cases, we will ensure that appropriate protections are in place to require the data processor in that country to maintain protections on the data that are equivalent to those that apply in the country in which you live.

Your personal information will not be passed on by us or by our service providers for use by third parties in any form whatsoever, unless we have obtained your consent or are legally required to do so.

## For what purposes does Besins Healthcare Australia collect, hold, use and disclose personal information?

The information we collect will be used for the purpose of enabling your use of the Besins Healthcare Australia website, supplying you with requested products or services, or for other purposes for which you have given your consent or which are disclosed in our Privacy Policy, except where otherwise provided by law.

## Overseas disclosure of personal information

Some of the persons or organisations to whom Besins Healthcare Australia may disclose your personal information may be located overseas. Under these circumstances, your personal information will always be stored in a secure manner which is at least as robust as the practices followed by Besins Healthcare Australia.

- Your personal information may be aggregated with data from other Besins Healthcare sources and stored or processed on computers or web-based database systems located outside Australia where data protection laws may differ from ours. Besins Healthcare's IT servers, databases and cloud-based data centres are located globally.
- Your personal information may be stored, maintained and processed on computers or web-based database systems at Besins Healthcare which may be accessed by and shared with any affiliate within the global Besins Healthcare Group and with third-parties working with Besins Healthcare affiliates. Our overseas related corporate bodies are located in the US, European Union and Asia Pacific, amongst others.
- Some of our overseas service providers, including our IT service providers, are located
  globally including in the US, European Union and Asia Pacific. Where Besins Healthcare
  Australia uses external service providers located in countries outside of Australia, Besins
  Healthcare Australia takes reasonable steps, including by contract provisions, to ensure that
  these service providers do not breach the Australian privacy laws.
- We may disclose your personal information to regulatory authorities overseas, such as the US FDA, ethics committees, or otherwise as required by law.

#### **Cookies**

Besins Healthcare Australia uses "cookies" on its websites. A cookie is a small data file that is placed on your computer when you use a particular website and which act as a memory for a website, allowing that website to remember your computer on your return visits. You have the ability to accept or decline cookies. If you choose to decline cookies, some areas of Besins Healthcare Australia's or other websites may not function properly. Besins Healthcare Australia may use cookies to compile statistics that allow us to understand how a website is used and to facilitate your visit to a website.

#### **Spam**

Besins Healthcare Australia's interactions with you are also regulated by the Commonwealth Spam Act. In compliance with this Act, Besins Healthcare Australia will not send you a commercial electronic message unless permitted.

## **Web Analysis**

Our website uses-a Google web analysis service ("Google").

Google will analyse your use of our website on our behalf. To this purpose, we use, among others, the Cookies described above. The information collected by Google in connection with your use of our website (e.g. the referring URL, which of our webpages you visit, your browser type, your language settings, your operating system, your screen resolution) will be transmitted to a server of Google in the United States, where it will be stored and analysed on behalf of Besins Healthcare Australia; the respective results will then be made available to Besins Healthcare Australia in an anonymised form. In this process, your usage data will not be connected to your full IP address. We have activated on our website the IP anonymising function offered by Google, so that the last 8 digits (type IPv4) or the last 80 bits (type IPv6) of your IP address are deleted. Moreover, Google is certified under the EU-US Privacy Shield, which ensures an adequate level of data protection with respect to the processing of data by Google in the US.

You may opt-out from the use of web analysis at any time by downloading and installing a **Browser Plugin** offered by Google or by managing your preferences via an opt-out cookie, which will be set if you choose not to use cookies. Both options will prevent the use of web analysis only if you use the browser on which you installed the plugin or if you do not delete the opt-out cookie.

For further information on Google Analytics please refer to the <u>Google Analytics Terms of Service</u>, the <u>Google Analytics security and privacy principles</u>, and the <u>Google Privacy Policy</u>.

## Management and security of personal information

Besins Healthcare Australia stores your personal information in hard copy documents or as electronic data in our software IT systems (and those of our service providers). As mentioned above, our IT servers, databases and cloud-based data centres are located globally.

Besins Healthcare Australia is committed to keeping your personal and sensitive information secure and has appointed a Privacy Officer to oversee Besins Healthcare Australia's management of personal information in accordance with this privacy policy and the Privacy Act.

Besins Healthcare Australia has directed its staff that personal information must be dealt with in accordance with its Privacy Policy and kept secure (using a variety of security technologies and procedures) from unauthorised access or disclosure.

# Updating personal information that Besins Healthcare Australia holds about you

Besins Healthcare Australia endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. You can, in most cases, correct the personal information Besins Healthcare Australia holds about you. Please contact the Privacy Officer if you believe that the information Besins Healthcare Australia holds about you requires changing or has become out-of-date.

# Accessing personal information Besins Healthcare Australia holds about you

You can, in most cases, access the personal information Besins Healthcare Australia holds about you. All requests for access to your personal information should be directed to the Privacy Officer. Besins Healthcare Australia will deal with requests for access to personal information as quickly as possible and will endeavour to respond within 14 days of receipt of the request in writing. In certain circumstances Besins Healthcare Australia is entitled to deny access. If access is denied, reasons for the denial of access will be given in writing.

## What if you have a complaint?

If you have any concerns or complaints about the manner in which your personal information has been collected or handled by Besins Healthcare Australia, please contact the Privacy Officer. Your concern or complaint will be directed to the appropriate complaint manager who will consider and respond to your complaint within 14 days.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction. However, if you are unhappy with our response, you may contact the Office of the Australian Information Commissioner who may investigate your complaint further. Further information about the application of the Privacy Act can be found at the website of the Office of the Australian Information Commissioner at www.oaic.gov.au

#### How to contact us

If you have questions about Besins Healthcare Australia and privacy, wish to provide feedback about our Privacy Policy, would like to update your personal details held by Besins Healthcare Australia or wish to access or correct information held by Besins Healthcare Australia about you, please contact the Privacy Officer at:

Email: privacy.au@besins-healthcare.com

Phone: **02 9418 8343**Fax: **02 9411 3475** 

#### Postal address

The Privacy Officer
Besins Healthcare Australia Pty Ltd
Level 2, Tower 1, 495 Victoria Ave
Chatswood, NSW 2067, Australia

#### Changes

From time to time, it may be necessary for Besins Healthcare Australia to review and revise this website statement and its Privacy Policy. Besins Healthcare Australia encourages you to periodically check our website where Besins Healthcare Australia will post the most up-to-date version of its Privacy Policy.

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