



PRIVACY POLICY

Privacy at iQnovate

iQnovate Ltd (“iQnovate”) is bound by the National Privacy Principles (“Principles”) contained in the *Privacy Act 1988 (Cth)* (the “**Privacy Act**”). The Principles define *personal information* as information or an opinion relating to an individual which can be used to identify that individual (such as name, address, telephone number, email address), and are designed to protect the confidentiality of personal information and the privacy of individuals by regulating the way personal information is managed.

iQnovate 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 policy outlines how we generally manage your personal information and protect your privacy.

Why does iQnovate collect personal information?

In the course of our business, iQnovate may collect personal information about you that is necessary for us to perform our functions. The personal information collected may vary depending on the type of our interaction with you, eg, your name, contact details, type of interaction. iQnovate will, however, only use your personal information for the purpose for which it was collected or may otherwise be permitted by law. For example, iQnovate may collect information about:

- Healthcare Professionals (including doctors, pharmacists, nurses) for one or more of the following purposes:
 - Maintaining a record of inquiries, complaints and adverse event reports relating to iQnovate projects;
 - Interaction with industry professionals;
 - Administering iQnovate programs such as meetings, symposia, conferences, expert panels, clinical trials and other research, disease awareness or similar programs;
 - Complying with our legal and regulatory obligations, eg product recalls product safety notifications.
- Members of the general public, in the course of their:
 - Use of information services;



- o Participation in iQnovate activities such as clinical trials, education and disease management programs.
- Third parties providing a service to iQnovate.
- Employees.

How does iQnovate use personal information and to whom may iQnovate disclose it?

The Principles generally require iQnovate to use personal information only for the primary purpose for which it is collected, or for secondary purposes which are related to the primary purpose.

In general, iQnovate uses personal information for the following purposes:

- as indicated to you at the time your personal information was supplied;
- to provide ongoing information about iQnovate's services to people that iQnovate believes may be interested;
- to provide services (including advice) that have been requested;
- to involve doctors/investigators (and the people who assist them) in clinical trials in accordance with Good Clinical Practice and regulatory requirements; and
- to comply with legal obligations.

iQnovate may disclose personal information to:

- its affiliates within and outside of Australia;
- third parties within or outside of Australia to help iQnovate improve and expand its services;
- regulatory authorities, within and outside of Australia, and ethics committees as part of a clinical trial evaluation, monitoring or inspection process.

Generally, we require that organisations outside iQnovate who handle or obtain personal information as service providers to iQnovate acknowledge the confidentiality of this information, undertake to respect an individual's right to privacy and comply with the National Privacy Principles and this Policy. iQnovate is not responsible for the privacy or security



practices of any third party. The collection and use of your information by these third parties may be subject to separate privacy and security policies.

In most cases, if you do not provide information about yourself which iQnovate has requested, iQnovate may not be able to provide you with the relevant service or information required.

Sensitive information

Some personal information collected by iQnovate is considered “sensitive”. Sensitive information which iQnovate may collect includes a person’s state of health and medical history or membership of professional or trade associations or unions. We generally do not collect sensitive information in relation to:

- race;
- political or religious beliefs;
- sexual preferences; or
- criminal convictions.

The Principles require that sensitive information is used and disclosed only for the purposes for which it was provided, or a directly related secondary purpose, unless you agree otherwise or for other specific reasons such as if the use or disclosure of this information is required by law or to prevent a serious and imminent threat to life or health of an individual.

Cookies

iQnovate uses a technology call “cookies” on its websites. A cookie is a small data file that is placed on your computer when you use a particular website. Cookies 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 iQnovate’s or other websites may not function properly.

iQnovate may use cookies to compile anonymous, aggregated statistics that allow us to understand how a website is used and to facilitate your visit to a website.

Spam

iQnovate’s interactions with you are also regulated by the *Spam Act 2003 (Cth)* (“**Spam Act**”). In compliance with the Spam Act, iQnovate will not send you a commercial electronic message unless permitted.



Management and security of personal information

iQnovate is committed to keeping your personal and sensitive information secure and has appointed a Privacy Officer to oversee iQnovate's management of personal information in accordance with this Policy and the *Privacy Act*.

iQnovate has directed its staff that personal information must be dealt with in accordance with this Policy and kept secure (using a variety of security technologies and procedures) from unauthorized access or disclosure.

Updating personal information that iQnovate holds about you

iQnovate endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. Please contact the Privacy Officer if you believe that the information iQnovate holds about you requires changing or has become out-of-date.

Accessing personal information iQnovate holds about you

You can, in most cases, access the personal information iQnovate holds about you. All requests for access to your personal information should be directed to the Privacy Officer by email or by writing to the address below. iQnovate 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 iQnovate is entitled to deny access. If access is denied, reasons for the denial of access will be given in writing.

What if you have an enquiry?

If you would like more information about the way iQnovate manages personal information or have any questions about this Privacy Policy, please contact the Privacy Officer. iQnovate will endeavour to act promptly in response to your request.

How to contact us

If you have questions about iQnovate and privacy, wish to provide feedback about this policy, would like to update your personal details held by iQnovate or wish to access information held by iQnovate about you, please contact the Privacy Officer at:

Email: info@iqnovate.com

Phone: +61 (0)2 8239 5400



From time to time it may be necessary for iQnovate to review and revise this privacy policy. iQnovate encourages you to periodically check our website where iQnovate will post the most up-to-date version of this privacy policy.

Additional privacy information is also available at:

www.privacy.gov.au

Policy last updated 26 September 2013