

1.0 Scope

This policy applies to Pharmacor Pty Ltd (Pharmacor) communications with:

- pharmacy customers, consumers, health professionals, patients, job seekers;
- the public, stakeholders and the media including through websites and social media;

in accordance with the *Privacy Act 1988 (Cth)*. It may be amended, replaced or repealed at any time to meet the reasonable needs of the business.

2.0 Collecting Personal information

Pharmacor will only collect information it needs to conduct a particular business activity or function. Pharmacor mainly collects personal information when it is supplied to us from you. In certain situations, we may need to collect sensitive information, such as information about your health, racial or ethnic origin, association memberships, religious beliefs, sexual orientation, criminal history, genetic or biometric information. Additionally, Pharmacor may also indirectly collect personal information about you from publicly available sources or from third parties, such as your authorised representative. Pharmacor also collects personal information from publicly available sources to enable us to contact stakeholders who may be interested in participating in meetings and/or consultations with us.

2.1 Pharmacy customers

Pharmacor collects personal information of individuals who own a pharmacy or are an employee of a pharmacy business. Personal information which we collect 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.

Pharmacor usually collects this information when we first get in contact with you, and throughout the duration of our business relationship. We use this information to facilitate and improve our business relationship with you. This may include, but is not limited to, things such as taking product orders, advising on a new product offering, arranging a store-visit, or advising on an existing order. If Pharmacor does not collect this information, it may limit our ability to provide the best service possible and ensure timely business transactions.

2.2 Consumers

In certain situations, Pharmacor may offer medicines and therapeutic products directly to you as customer. In order to facilitate the payment for these goods, Pharmacor will collect contact details, delivery address and payment details. These details are collected when you make your purchase, which are used to enable purchasing and delivering the goods. Failing to disclose this information may result in a purchase not being confirmed.

2.3 Health professionals

If you are a healthcare professional, such as a doctor or pharmacist, we may collect information about you during pharmacovigilance activities or if you provide a product queries and feedback. Pharmacor will collect this information from you when you first contact us. Contact information which you provide will be used to follow up on your queries or feedback, or as part of pharmacovigilance activities. If you do not provide Pharmacor with this information, or do not provide your consent, it may inhibit our ability to properly investigate adverse reports, or provide a response to your query.

Should you provide Pharmacor with health information relating to one of your patients, Pharmacor has the expectation that you have obtained the consent of the patient. If we are not satisfied you have gained the patients consent to disclose their details, they may be deidentified.

2.4 Patients

Pharmacor may collect your information during pharmacovigilance reporting, either when it is given directly to us from you or provided via your healthcare professional. The types of information Pharmacor collects includes your name, contact details, medical status and background, any medications taken. Pharmacor collects this information to investigate pharmacovigilance reports and provide feedback to you and your healthcare professional (if required). If Pharmacor does not collect this information, we may not be able to appropriately investigate a pharmacovigilance or product complaint report, limiting the service we can provide to you as a patient and to your healthcare professional.

2.5 Business associates and contractors

Pharmacor collects personal information of its business associates, contractors, consultants, and respective employees. The information collected is contact information and will be given to us from you or your current employer. Pharmacor uses this information for the purpose of the business relationship. If we fail to collect this information, it may limit Pharmacor's ability to contact you, and in turn, limit the business relationship.

2.6 Potential Employees

Pharmacor collects the personal information of individuals who apply and are shortlisted for a position within Pharmacor. When you apply, we collect information such as your name, contact details, curriculum vitae, professional experience, and other associated information, either through a service provider or directly from you. Pharmacor uses this information to assess your suitability for employment. We may also retain this information for future vacancies which we may consider you for.

We will usually collect personal information directly from you through conversations in person, over the phone, zoom or via email (including when you send us your resume or cover letter). We also collect information in other ways such as through your interaction with our websites, social media, online job applications or via a third party, for example, a nominated referee from a previous employer.

The amount of personal information that you are required to supply will be limited to only that which is necessary. If we are not provided with the information we seek, we may be limited in our ability to follow our recruitment processes (your application may be excluded) or enter into a contract with you. In the event that we receive unsolicited personal information about you that we did not take any active step to receive, we will deal with it according to the Australian Privacy Principle 4.

We generally do not collect sensitive information about candidates or contractors but will do so when required or authorised by law (for example to implement any necessary accommodations to a health condition while attending an interview), or where you consent to provide this information.

Sensitive information is information about your:

- Health;
- Racial or ethnic origin;
- Political opinions;
- Membership of a political association, professional or trade association or trade union;
- Religious beliefs or affiliations;
- Sexual preferences or practices;
- Criminal records.

In the unlikely event we source sensitive information about you, we will do so in accordance with the Australian Privacy Principles and with other applicable laws such as State or Territory and Commonwealth Anti-Discrimination Laws.

3.0 Anonymity

Where possible, we will allow you to interact with us anonymously or using a pseudonym. For example, if you contact our enquiries line with a general question, we will not ask for your name unless we need it to adequately handle your question. However, most of our functions and activities usually require your name and contact information and enough information about the particular matter to enable us to fairly and efficiently handle your inquiry, request, complaint or application.

4.0 Collecting information through our websites

Pharmacor Pty Ltd public website pharmacor.com.au is hosted in Australia. We use Google Analytics to collect data about your interaction with our website. The main purpose of collecting your data is to improve your experience when using our site. We also use this data to understand and report on which content pages and downloads are accessed by visitors.

The types of data we collect with these tools include:

- your device's IP address (collected and stored in an anonymized format)
- search terms and pages visited on our website
- date and time when pages were accessed
- downloads, time spent on page, and bounce rate
- referring domain and out link if applicable
- device type, operating system and browser information
- device screen size
- geographic location (city).

If your web browser has Do Not Track enabled, we will not track your visit. We host Google Analytics ourselves within Australia. Most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before accessing our website.

We use Google's YouTube site to host videos which are embedded on our website. Embedded videos on our website use YouTube's Privacy Enhanced Mode. When you play an embedded video from our website, the video and associated assets will load from the domain [www.youtube-nocookie.com] and other domains associated with Google's YouTube player.

YouTube collects information about user activity including videos watched and interactions with content and ads. These analytics are made available to us, and we use this information to understand how our videos perform. You can access the privacy policy for YouTube on the Google website [Found here - <https://policies.google.com/privacy?hl=en-GB>]

5.0 Mailing Lists

We will collect information that you provide to us when signing up to mailing lists, registering for an event, or when submitting feedback on your experience with our website.

Analytics are performed when you click on links in the email, or when you download the images in the email. They include which emails you open, which links you click, your mail client (e.g. 'Outlook 2016' or 'iPhone'), if your action occurred on 'mobile' or 'desktop', and the country geolocation of your IP address (the IP address itself is not stored).

6.0 Social networking services

We use social networking services such as, LinkedIn, Instagram and YouTube to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public.

The social networking service will also handle your personal information for its own purposes.

These services have their own privacy policies. You can access the privacy policies for LinkedIn, Instagram and YouTube (a Google company) on their websites.

7.0 Disclosure to Third Parties

We may notify the OAIC of a notifiable data breach in accordance with the *Privacy Act 1988 (Cth)*.

We may also disclose personal information to service providers that host our website servers, manage our IT and human resources information.

8.0 Disclosure of sensitive information

We only disclose your sensitive information for the purposes for which you gave it to us or for directly related purposes you would reasonably expect and in all other cases if you agree.

9.0 Disclosure of personal information overseas

Web traffic information is disclosed to Google Analytics when you visit our websites. Google stores information across multiple countries. When you communicate with us through a social network service such as LinkedIn or Instagram, the social network provider and its partners may collect and hold your personal information overseas.

10.0 Quality of personal information

To ensure that the personal information we collect is accurate, up-to-date and complete we:

- record information in a consistent format
- where necessary, confirm the accuracy of information we collect from a third party or a public source
- promptly add updated or new personal information to existing records
- regularly audit our contact lists to check their accuracy.

We also review the quality of personal information before we use or disclose it.

11.0 Storage and security of personal information

All personal information collected is held on our cloud storage, on servers located in Australia. We retain effective control over any personal information held on our cloud, and the information is handled in accordance with the Australian Privacy Principles. We take steps to protect the security of the personal information we hold from both internal and external threats by:

- regularly assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information
- taking measures to address those risks, for example, we keep a record (audit trail) of when someone has added, changed or deleted personal information held in our electronic databases and regularly check that staff only access those records when they need to
- conducting regular internal and external audits to assess whether we have adequately complied with or implemented these measures.

We destroy personal information in a secure manner when we no longer need it.

12.0 Accessing and correcting your personal information

Under the Privacy Act (APPs 12 and 13) you have the right to ask for access to personal information that we hold about you, and ask that we correct that personal information. You can ask for access or correction by contacting us and we must respond within 30 days.

If you ask, we must give you access to your personal information, and take reasonable steps to correct it if we consider it is incorrect, unless there is a law that allows or requires us not to. We will ask you to verify your identity before we give you access to your information or correct it, and we will try to make the process as simple as possible.

If we refuse to give you access to, or correct, your personal information, we must notify you in writing setting out the reasons. The steps appropriate to verify an individual's identity will depend on the circumstances. We will seek the minimum amount of personal information needed to establish an individual's identity.

For example, during a telephone contact it may be adequate for us to request information that can be checked against our records. If we make a correction and we have disclosed the incorrect information to others, you can ask us to tell them about the correction. We must do so unless there is a valid reason not to.

If we refuse to correct your personal information, you can ask us to associate with it (for example, attach or link) a statement that you believe the information is incorrect and why.

13.0 How to make a complaint

If you wish to complain to us about how we have handled your personal information you should first complain to us in writing. If you need help lodging a complaint, you can contact us via

- Email: privacy@pharmacor.com.au
- Phone: 1300 138 805
- Post: Suite 803, Level 8, Tower A, The Zenith, 821 Pacific Highway, Chatswood NSW 2067

If we receive a complaint from you about how we have handled your personal information we will determine what (if any) action we should take to resolve the complaint. If we decide that a complaint should be investigated further, the complaint will usually be handled by a more senior officer than the officer whose actions you are complaining about. We will tell you promptly that we have received your complaint and then respond to the complaint within 30 days.

14.0 Contact us

For further information about this policy please contact privacy@pharmacor.com.au