



Privacy Statement and Privacy Policy

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This Privacy Statement and Privacy Policy is applicable in Australia and sets out the privacy, credit and personal information policy of **BNE Pharmacy Pty Ltd ATF the BNE Pharmacy Unit Trust ABN 85 224 118 453 t/as Cloud Pharmacy**, including any other associated, subsidiary and parent companies, divisions, successors and assigns that conduct business in Australia (all of which are referred to in this document as "**Cloud Pharmacy**").

Privacy Statement

Privacy Laws

Cloud Pharmacy is committed to complying with the *Privacy Act 1998* (Cth) ("**the Act**"), the Australian Privacy Principles ("**the APPs**") and the *Privacy (Credit Reporting) Code 2014* (Cth) ("**the Code**") as amended from time to time. In this document, these statutes and codes are collectively referred to as "**the Privacy Laws**".

Our Privacy Statement – We Respect Your Privacy

Cloud Pharmacy is committed to your privacy. Our policy on handling Personal Information (any information that identifies you or could reasonably identify you) and Sensitive Personal Information (a subset of Personal Information that includes health or genetic information) is to comply with the Privacy Laws as amended from time to time for the fair handling of Personal Information.

Our Privacy Policy is outlined in this document and you can obtain a copy of it on our website at www.cloudpharmacy.me.

We may collect types of Personal Information from you during our relationship and we will advise you of this (and other matters about the collection of Personal Information) before, at or as soon as possible after the time of collection. We may collect Personal Information directly from you, or we may collect it from third parties where you have consented to your Personal Information being shared (or you would reasonably expect your Personal Information to be shared). For example, we often collect an individual's Personal Information from our third party principals to whom we are contracted to supply goods and services.

We use the Personal Information collected for several purposes, including:

- 1) Providing you with our products and services and/or information about our products and services, including assessing prescriptions for medication and dispensing medication;
- 2) Paying for our goods and services;
- 3) Assessing applications for employment (where applicable);
- 4) Record keeping and administering our business activities, including the relationships with our third party providers, suppliers and principals;
- 5) Communicating with you by telephone, email, SMS or mail;
- 6) Managing, researching and developing our products and services;
- 7) Managing, servicing and reviewing accounts, including overdue accounts;
- 8) Managing client account and payment information, including bank account details;
- 9) Distributing articles or publications to you;

- 10) Investigating any complaints;
- 11) Insurance and debt collection purposes; and
- 12) Complying with our legal obligations, resolving disputes and enforcing our agreements with you.

This information may be disclosed to our related or associated entities, health care providers to or from whom you are referred, parties related to your employment (e.g. referees and others as set out in our Privacy Policy), parties related to your goods and services including contractors, cloud-service providers, IT professionals, other pharmacies where necessary for ensuring that your prescriptions and medications are continued, and, if necessary, our professional advisors including risk insurers, solicitors and financial institutions.

You have a right not to provide information that can identify you. However, if all or part of the Personal Information that we request from you is not provided, then we may not be able to do certain things (including supply you with goods, consider any application for goods made by you, or process your request for a commercial credit account).

In accordance with the Privacy Laws and the Cloud Pharmacy Privacy Policy, you will be given access to your Personal Information on request. If you have any questions or concerns about our Privacy Policy, the types of Personal Information we may hold about you, or for corrections or complaints about a breach of your privacy, please direct your requests to our Privacy Officer at 23/140 Robinson Road East, Geebung QLD 4034 or telephone (07) 2102 5006 or email dan@cloudpharmacy.me.

Privacy Policy

Our Privacy Policy - Collection of your Personal Information

Cloud Pharmacy is committed to the protection of your Personal Information. Personal information is any information or an opinion about an identified individual or an individual who is reasonably identifiable. We may collect types of Personal Information from you throughout our relationship and we will advise you of this (and other matters about the collection of Personal Information) before, at or as soon as possible after the time of collection.

Generally, the kinds of information Cloud Pharmacy may collect about an individual may include an individual's name, signature, residential address, email address, telephone number, date of birth, gender, financial details (including bank account details or credit card information), government identifiers such as tax file numbers, Medicare numbers, healthcare identifiers, concession card details or other entitlement details, employment details and employment history (where applicable), information in connection with client surveys and promotions, device identity and type, geo-location information, advertising data and standard web log information, page view statistics, insurance policy information, and health information (subject to the policies below).

The specific types of Personal Information that we collect from you and how we collect that information will depend on the services you require from us and how you interact with us. Cloud Pharmacy may collect Personal Information directly from the individual concerned, or we may collect it from third parties. For example, we often collect an individual's Personal Information from our third party principals to whom we are contracted to supply goods and services. In many cases, Cloud Pharmacy collects information by being provided with your prescription medication orders by those third parties.

Where direct collection is not possible or practicable, Cloud Pharmacy will take reasonable steps to

ensure that the individual is informed about the collection, unless the individual has previously consented to the collection (either expressly or impliedly) or it would be reasonably expected for your Personal Information to be shared (such as to ensure continuity of your prescription medication).

When you request goods and services from us directly, we will ask you many details about you or your business. That information assists us in making decisions about our intended relationship with you and the terms of that relationship. You have a right not to provide information that can identify you. However, if all or part of the Personal Information that we request from you is not provided, Cloud Pharmacy may not be able to do certain things (including supply you with our goods and services).

At the time of collecting Personal Information about an individual, or as soon as practicable after that time, Cloud Pharmacy takes reasonable steps to ensure the individual is aware of:

- (a) The identity and contact details of Cloud Pharmacy and Cloud Pharmacy's Privacy Officer;
- (b) The purposes for which the information is being collected;
- (c) Any organisations to which Cloud Pharmacy may disclose the information to;
- (d) The fact that an individual has a right to gain access to the personal information collected; and
- (e) The main consequences (if any) for the individual if all or part of the information is not provided.

We will not collect any sensitive Personal Information from you revealing racial or ethnic origin, political opinions or political association memberships, religious or philosophical beliefs, professional or trade union membership, or details of health, disability information, genetic or biometric information, or sexual activity or orientation.

Exceptions to this include:

- (a) Where you have given express consent to Cloud Pharmacy to do so and where it is necessary for Cloud Pharmacy to carry out one of its primary functions. For example, collection of your health information is necessary for Cloud Pharmacy to perform its primary functions of dispensing medications;
- (b) Where there are reasonable grounds to believe that disclosure is necessary to prevent a threat to life or health. For example, to ensure your continuity of prescription medication;
- (c) The use is authorised by law or reasonably necessary to enforce the law; or when the information is necessary for the establishment, exercise or defence of a legal claim.

If we receive Personal Information which we did not solicit, we will determine as quickly as possible whether or not that Personal Information could have been lawfully collected by us in accordance with the Privacy Laws and Cloud Pharmacy's Privacy Policy. If so, we will only use the unsolicited Personal Information as if that information had been solicited by Cloud Pharmacy (that is, lawfully and fairly in accordance with the Privacy Laws and our Privacy Policy). If not, we will take reasonable steps to de-identify or destroy the information.

When you use Cloud Pharmacy's website at www.cloudpharmacy.me or social media pages, our Internet Service Provider (ISP) and analytics providers may make a record of your visit and log your server address, your domain name, the date, time and duration of your visit, the pages and documents you accessed, the previous site you had accessed (i.e. the referring URL) and the type of browser you are using. This information is collected for statistical purposes only, and Cloud Pharmacy will not make any attempt to identify users according to their browsing activity.

In the unlikely event of an investigation, a law enforcement agency or other government agency may exercise its legal authority to inspect our business records or ISP's logs. It is also possible that your ISP is logging your activity while you visit our site. This is beyond the control of Cloud Pharmacy.

While you are visiting our site, we may use cookies to facilitate a more personalised web browsing experience. Except where you volunteer personal or business information, we will not procure information about you via any alternative means while you visit our website. We may use Google Analytics to collect and process data, including when you use third party websites or apps.

To find out more see [How Google uses data when you use our partners' sites or apps](#).

In some circumstances, Cloud Pharmacy will provide you with an option of not identifying yourself, or of using a pseudonym, when dealing with us (unless Cloud Pharmacy is required or authorised by Australian law or a Court/Tribunal order to deal with individuals who have identified themselves, or where it is impracticable to do so).

Our Privacy Policy - How we use and disclose personal information

The Personal Information that you provide to us is used for several primary purposes. These purposes include:

- (a) Providing you with our products and services and/or information about our products and services, including assessing prescriptions for medication and dispensing medication;
- (b) Paying for our goods and services;
- (c) Assessing applications for employment (where applicable);
- (d) Record keeping and administering our business activities, including the relationships with our third party providers, suppliers and principals;
- (e) Communicating with you by telephone, email, SMS or mail;
- (f) Managing, researching and developing our products, services and customer experiences;
- (g) Managing, servicing and reviewing accounts, including overdue accounts;
- (h) Managing client account and payment information, including bank account details;
- (i) Distributing articles or publications to you;
- (j) Investigating any complaints;
- (k) Insurance and debt collection purposes; and
- (l) Complying with our legal obligations, resolving disputes and enforcing our agreements with you.

Cloud Pharmacy will not sell, rent or trade your Personal Information.

Any Personal Information which you do supply will only be used internally at Cloud Pharmacy and will not be divulged to a third party unless that third party is associated or integral to the purpose for which you gave us the information (such as ensuring continuity of your prescription medication) or where required by law.

We will only use and disclose Personal Information about you for the purpose for which you gave us that information. We may use and disclose Personal Information about you for a purpose other than the purpose for which you gave us the information where:

- (a) That other purpose is related to the purpose for which you gave us the Personal Information;

- (b) You have given us your consent for the Personal Information to be used or disclosed for the additional purpose;
- (c) Where there are reasonable grounds to believe that use or disclosure is necessary to prevent a threat to life or health;
- (d) Where we suspect that unlawful activity is or has been engaged in and we use or disclose the Personal Information to investigate the suspected unlawful activity; or
- (e) The use or disclosure is authorised by law or reasonably necessary to enforce the law.

During the ordinary course of business, Cloud Pharmacy may disclose your Personal Information as required by law or to third parties related to your services, including:

- (a) government departments such as courts, tribunals and regulatory authorities as permitted by law;
- (b) health care providers to or from whom you are referred, including other pharmacies where necessary to fulfil orders or provide services;
- (c) health insurers and other third-party payers or claims administrators, where reasonably necessary to verify, assess, process, manage or audit a claim or benefit you have made or sought in connection with our services;
- (d) our related entities, employees, contractors, including cloud-service providers, IT professionals and marketing agencies;
- (e) parties related to your employment, for example a worker's compensation insurers (where applicable);
- (f) if necessary, our professional advisors including risk insurers, solicitors and financial institutions; and
- (g) anyone else to whom you consent.

Cloud Pharmacy may also disclose your personal information to organisations involved in a transfer or sale of all or part of our business or its assets or one involved in managing our corporate risk and funding requirements.

Cloud Pharmacy has well-documented, detailed procedures in managing personal data relating to the administration of customer accounts which are compliant with the APPs. Compliance to these procedures is monitored by Cloud Pharmacy on an ongoing basis.

Our Privacy Policy – Overseas Disclosure

In the normal course of business, Cloud Pharmacy stores Personal Information on servers located in Australia and does not currently disclose or transfer Personal Information to overseas recipients.

However, the cloud service providers we engage to provide us Australian-based servers may operate overseas disaster recovery sites or have personnel overseas who may access the personal information we hold to assist us in managing our servers. Where personal information is disclosed overseas, we will ensure that any such transfer complies with APP 8 regarding cross-border disclosure. We also may use Google Analytics to track web traffic information which is operated by Google which stores information across multiple countries.

Cloud Pharmacy will take reasonable steps to protect an individual's privacy if this disclosure occurs. If the disclosure on overseas recipients changes, we will update this Privacy Policy. You agree and consent to the possible use and disclosure of this information to overseas recipients from time to time in accordance with this Privacy Policy and Privacy Statement.

Our Privacy Policy - Direct Marketing

Cloud Pharmacy may also use your Personal Information, including e-mail addresses, for the purpose of direct marketing (in accordance with the Spam Act 2003 (Cth)). We may only use your Personal Information or data for the purpose of direct marketing in relation to promotional activities where it is impracticable for us to obtain your prior express consent. However, when we do this, we will provide an express opportunity when we first contact you to decline receiving any further marketing communications from us, via an opt-out mechanism. Please contact us if you do not want to receive any direct marketing information or if you do not want your information disclosed for direct marketing purposes.

Our Privacy Policy - Security of your personal information

Cloud Pharmacy will take all reasonable steps to ensure that all Personal Information we collect, use or disclose is stored in a secure environment accessed only by authorised persons. Cloud Pharmacy will take reasonable steps to protect any Personal Information that it holds from misuse, loss, unauthorised access, modification or disclosure, and to destroy or permanently de-identify Personal Information if it is no longer needed for any purpose. Cloud Pharmacy requires any third party, service provider, or other entity to which Cloud Pharmacy discloses Personal Information to comply with this Privacy Statement and Privacy Policy and to comply with the APPs.

Cloud Pharmacy's information technology systems are password protected and uses a range of administrative and technical security measures designed to protect against the loss, misuse and/or alteration of the information under its control, including restricted access, firewalls, antivirus protection across workplace computers, and encryption.

Cloud Pharmacy maintains both local and cloud-based backups of data to support business continuity and reduce the risk of data loss. Cloud-based servers used by Cloud Pharmacy for storing data are located in Australia.

Cloud Pharmacy provides staff with training on digital safety and the secure handling of information in the workplace to support the protection of Personal Information.

While Cloud Pharmacy takes reasonable steps to protect Personal Information, Cloud Pharmacy cannot guarantee the security of Personal Information and acknowledges that there is a residual risk in transmitting any data electronically. This risk is inherent in any internet dealings.

Once personal information (including credit card information) is no longer required by Us for the purposes for which it was collected or held or otherwise in accordance with the Act, We will take all steps as are reasonable in the circumstances to ensure that it is either destroyed or de-identified. You can ask Cloud Pharmacy to delete Your personal information (including Your credit card information) at any time.

Our Privacy Policy – PCI DSS (Payment Card Industry Data Security Standards)

Cloud Pharmacy will take all reasonable steps to ensure that Personal Information relating to card payment or collection of card data is protected by the Payment Card Industry Data Security Standards. This includes:

1. Installing and maintaining a firewall configuration to protect cardholder data;
2. Not using vendor-supplied defaults for system passwords and other security parameters;
3. Protecting stored cardholder data in accordance with this Privacy Policy;
4. Encrypting transmission of cardholder data across open public networks;
5. Using and regularly updating anti-virus software or programs;

6. Developing and maintaining secure systems and applications;
7. Restricting access to cardholder data in accordance with this Privacy Policy;
8. Assigning a unique ID to each person with computer access;
9. Restricting physical access to cardholder data;
10. Tracking and monitoring all access to network resources and cardholder data;
11. Regularly testing security systems and processes; and
12. Maintaining this Privacy Policy that addresses information security for employees and contractors.

Our Privacy Policy - How to access, correct or update your information

Cloud Pharmacy will take all reasonable steps to ensure that all Personal Information we collect, use or disclose is accurate, complete and up-to-date. Cloud Pharmacy will review Personal Information on its databases at regular intervals to ensure all information kept is up to date.

You have a right to seek access to your Personal Information and to correct that information. Please contact Cloud Pharmacy if your details change or if you believe the Personal Information we have about you is not accurate or complete. We will provide you with a reasonable opportunity to access your Personal Information and have it corrected or updated. A fee may apply to access and you will be required to provide the appropriate identification.

Exceptions to your access rights may include:

- (a) Where providing access will pose a serious threat to the life or health or any individual or pose an unreasonable impact on the privacy of an individual;
- (b) Your request for access is frivolous or vexatious;
- (c) Where the information relates to existing legal proceedings between Cloud Pharmacy and you and the information would not be discoverable in the process of those legal proceedings; or
- (d) Where providing access would be unlawful, may prejudice an investigation of possible unlawful activity, may prejudice enforcement of laws, or denying access is specifically authorised by law.

Where Cloud Pharmacy refuses a request for correction or access, you will be provided with written reasons for the refusal and details of complain mechanisms.

Our Privacy Policy - Complaints

Cloud Pharmacy takes your complaints seriously. If you believe that Cloud Pharmacy has not dealt with your Personal Information in a manner that complies with the Privacy Laws as amended from time to time, please contact our Privacy Officer at 3/140 Robinson Road East, Geelong QLD 4034 or telephone (07) 2102 5006 or email dan@cloudpharmacy.me.

You must submit your complaint in writing. Cloud Pharmacy will use its best endeavours to provide a response in writing within a timely manner, and to correct any Personal Information and notify any other entity required with updated information.

Cloud Pharmacy has detailed procedures for dealing with Privacy Law breaches. If you are dissatisfied with the outcome of your complaint, or if Cloud Pharmacy refuses to provide access to, or correction of, your Personal Information, you may complain to the Office of the Australian

Information Commissioner at www.oaic.gov.au.

Our Privacy Policy - Transparency

This Privacy Statement and Privacy Policy is available on Cloud Pharmacy's website at www.cloudpharmacy.me and will be made available free of charge to anyone who requests a copy.

This Privacy Statement and Privacy Policy may be reviewed and amended from time to time, and any updated version will be made available on Cloud Pharmacy's website or on request and will apply from the date the updated version is so published or provided.

Our Privacy Policy - How to Contact Us

You can contact Cloud Pharmacy and our Privacy Officer at 3/140 Robinson Road East, Geebung QLD 4034 or telephone (07) 2102 5006 or email dan@cloudpharmacy.me.