

## PRIVACY POLICY

This Privacy Policy is published by FM Integrated Pharmacy Services Pty Limited (ACN 099 858 081) trading as Instigo.

### 1. Definitions in this Privacy Policy:

Website means [www.instigo.com.au](http://www.instigo.com.au), [www.lifeclub.com.au](http://www.lifeclub.com.au) and [www.pharmacycatalyst.com.au](http://www.pharmacycatalyst.com.au).

We/our/us means FM Integrated Pharmacy Services Pty Limited (ACN 099 858 081) trading as instigo, Pharmacy Catalyst and LifeClub and includes our related and associated entities.

The term "**personal information**" as used throughout this policy, applies to any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. whether the information or opinion is true or not; and
- b. whether the information or opinion is recorded in a material form or not.

### 2. Application of Privacy Policy

- a. This Privacy Policy applies to all persons who interact with us (you/your), including everyone who visits or uses our website, anyone else who uses any of our products and services whether directly through us or our partners or service providers.
- b. By visiting and/or using our Website and our products and services and/or dealing with us, you agree to the terms and conditions of this Privacy Policy.

### 3. We respect your privacy

- a. We respect your right to privacy and are committed to safeguarding the privacy of our customers and Website visitors.
- b. We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).
- c. We will manage your personal information in an open and transparent way.
- d. We have commercially acceptable internal processes and controls in place to store your personal information securely in our various systems across our network.

### 4. This Privacy Policy provides information about:

- What personal information we collect
- How we collect your personal information
- How long we hold your personal information
- How and why we may use your personal information
- How we may disclose your personal information

- How your personal information is stored
- Data breaches and security
- How you may access and correct your personal information
- Contact address for privacy questions, complaints or concerns

## **5. What personal information we collect**

- a. We may, from time to time, receive and store personal information you enter onto our website, provided to us directly or given to us in other forms (via third parties for example).
- b. You may provide basic information such as your name, phone number, ABN, date of birth, address and email address to enable us to send information, provide updates and process your product or service order.
- c. We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.
- d. We may also collect other personal information you give us when you request a good or service from us. This information may include: your requirements with respect to specific goods or services; your opinion or preferences with respect to any of our goods or services; or your credit card details, or your preferred payment method.
- e. We may collect information contained in an application form or other document given to us and transactional information about your acquisition and use of our goods and services and any information we are required to collect by law.
- f. You may choose not to provide us with your personal information. However, without certain personal information we may not be able to provide you with the services you require, or the level of service on which we pride ourselves.
- g. We do NOT actively collect or hold, nor do we need to know any sensitive (personal) information (such as personal information about your racial or ethnic origin, health information, political opinions, membership of a political association, professional or trade association or trade union, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices, criminal record, genetic information, biometric information or biometric templates).

## **6. How we collect your personal information**

- a. We collect your personal information in a variety of ways, including when you interact with us electronically, over the phone or in person, when you access our website and when we provide our services to you.
- b. We may receive personal information from third parties.
- c. We may also collect information about your computer or other electronic device when you visit our websites and use our online resources. This information may include your Internet Protocol (IP) address, domain name, browser type, date and time of your request and information provided by tracking technologies, such as cookies and single-pixel tags and Ad-Words. If

you use a mobile device to access our web sites and online resources, we also may collect information about your device, such as your device ID and device type, as well as usage information about your device and your use of our mobile websites and other mobile resources.

- d. Some of our websites and other online resources use tracking technologies to provide additional functionality that enables you to use these resources more effectively.

**What are cookies?**

A cookie is a small data file that is sent by web servers to your computer's hard drive, where your Internet browser files are kept. Cookies enable websites to store small bits of information on your computer and retrieve that information at a later time. We may use two types of cookies: session cookies, which are temporary cookies that are erased from your computer's memory when you close your Internet browser or turn your computer off, and persistent cookies, which exist on your computer's hard drive until they expire, unless you delete them at an earlier time.

**What are single-pixel tags?**

Single-pixel tags, also known as web beacons or web tags, are graphics that function similar to cookies. Single-pixel tags are not visible because of their small size. They are used to collect information in web logs that does not identify you personally such as web pages viewed, the web site you came from and the advertisement you clicked on to visit our web sites. They are also used to determine whether certain promotional or other commercial e-mail messages we send are opened.

**7. How long we hold your personal information**

- a. We keep your personal information only for as long as it is reasonably necessary for the purpose of collection and in accordance with any applicable legal reporting or documentation retention requirements.
- b. We may use your personal information to send you further information, if it relates to the purpose of collection, which we consider being of importance to you, but we will always provide you with the opportunity to tell us if you do not want to receive this further information.

**8. Use of your personal information**

- a. We may use personal information collected from you to provide you with information, updates and our services.
- b. We may also make you aware of new and additional products, services and opportunities available to you.
- c. We may use your personal information to improve our products, website and services and better understand your needs.
- d. We may contact you by a variety of measures including, but not limited to telephone, email, SMS or mail.

- e. We may also use your personal information to comply with our legal obligations.
- f. We may also use your personal information to process payments.
- g. We may use your personal information in order to develop, improve and market our goods and services.
- h. Where we are allowed by law to do so, we may also use your personal information to market to you and offer you promotions through our rewards program LifeClub in accordance with the terms and conditions which can be found [<https://lifeclub.com.au/site/help-and-information>].
- i. Otherwise, we will generally not direct market to anyone unless they have been given an opportunity to opt out of receiving future direct marketing communications.
- j. You may choose to opt-out of marketing and research communications by advising us directly. Please refer to our direct contact details at the end of this Privacy Policy.

## **9. Disclosure of your personal information**

- a. We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers, service providers, related companies or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy.
- b. Personal information is only supplied to a third party when it is required for the delivery of our services or any related services.
- c. We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.
- d. We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of us and customers or third parties.
- e. Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia, including, but not limited to, New Zealand.
- f. We will only transfer personal information to someone who is in a foreign country if:
  - i. We reasonably believe that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the personal information that are substantially similar to the Australian Privacy Principles and the Privacy Act;
  - ii. you consent to the transfer;
  - iii. the transfer is necessary for the performance of a contract between you and us, or for the implementation of pre-contractual measures taken in response to your request;

- iv. the transfer is necessary for the conclusion or performance of a contract concluded in the interest of you between us and a third party;
- v. All of the following apply:
  - 1. The transfer is for your benefit;
  - 2. It is impracticable to obtain your consent to that transfer;
  - 3. If it were practicable to obtain such consent, you would be likely to give it; or
- vi. We have taken reasonable steps to ensure that the information transferred will not be held, used or disclosed by the recipient of the information inconsistently with the Privacy Act.
- g. In any event, if we store, process or transfer any personal information outside of Australia we will only do so in so far it is permissible under the Australian Privacy Principles and the Privacy Act.
- h. If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances and at all times only in accordance with the Privacy Act.
- i. By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information.
- j. We may also disclose personal information where you consent to us doing so. That consent may be written, verbal or implied from your conduct.

## **10. How personal information is stored**

We will store your personal information in a secure environment. It's protected by a combination of physical and technological measures. If you want more information about the way we manage the information we hold please contact us as we would be happy to provide you with further information on our processes. Our contact details can be found at the end of this document.

## **11. Data breaches and security**

- a. In accordance with our Privacy Policy, we have implemented strict procedures and systems designed to protect the security of your personal information. Our aim is to carefully protect your data from misuse, interference, loss, unauthorised access, modification or disclosure, alteration or destruction.

- b. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Whilst we strive to protect your personal information from misuse, loss and unauthorised access, we cannot guarantee the security of any information you transmit to us or receive from our online products or services sites. You conduct these activities at your own risk. Once we receive your transmission, we make our best effort to ensure its security.
- c. If a data breach occurs in respect of your personal information we will notify you about such data breach if we are required to do so in accordance with the Privacy Act.

## **12. Access to your personal information**

- a. You may request details of personal information that we hold about you in accordance with the provisions of the Privacy Act 1988 (Cth). You may be required to put your request in writing for security reasons.
- b. We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information you provide. We recommend that you:
  - i. let us know if there are any errors in your personal information; and
  - ii. keep us up to date with changes to this information such as your name and address.
- c. A small administrative fee may be payable for the provision of information.
- d. If you would like a copy of the information, which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at [info@instigo.com.au](mailto:info@instigo.com.au).
- e. We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act.

## **13. Contact address for privacy questions, complaints or concerns**

If you wish to notify us of your new contact details, make a complaint about a breach of privacy or have any questions in relation to the accuracy of your information or privacy, please contact our Information and Privacy Officer by:

Telephone: 02 9248 2616

E-mail: [info@instigo.com.au](mailto:info@instigo.com.au)

Mail: Level 8, 215 Clarence St, Sydney, New South Wales, 2000

Website: [www.instigo.com.au](http://www.instigo.com.au), [www.pharmacycatalyst.com.au](http://www.pharmacycatalyst.com.au), [www.lifeclub.com.au](http://www.lifeclub.com.au)

## **14. Miscellaneous**

### **a. Changes to Privacy Policy**

Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications

will be effective immediately upon our posting of the modifications on our website or notice board. Please check back from time to time to review our Privacy Policy.

b. **Third party sites**

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that we are not responsible for the privacy practises of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.