



Privacy Policy

Novita Healthcare Limited

ABN 53 108 150 750

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Confidential

NOVITA PRIVACY POLICY

This is the Privacy Policy of Novita Healthcare Limited ACN 108 150 750 (collectively referred to as **Novita, we, our or us**).

At Novita, we take privacy very seriously, and this Privacy Policy, which is available at www.novitahealthcare.com.au explains how personal information provided to us may be used by Novita.

Scope

This Novita Privacy Policy applies to the collection, storage, processing, transfer, and use of personal information concerning covered individuals except in circumstances where privacy terms and conditions have been embodied into formal contractual arrangements with a third party.

We recognise that personal information received by Novita is held in a position of trust, and we endeavour to honour that trust by adhering to the following general principles regarding personal data.

Objective and aims

To protect personal information and follow privacy policies and data protection practices in compliance with the law and with regard to protecting the interests of our supplier, partner, customer, stakeholder and third party relationships.

Novita's directors, executives and employees, and those working on Novita's behalf, are duly informed about these policies and practices and instructed to follow them.

Our privacy policies are designed to reflect current global principles and standards on handling personal information and to this end we endeavour at all times to comply with the privacy laws in the countries where we do business.

Data security

Novita is committed to protecting personal information against unauthorised use or disclosure.

Our aim is to adhere at all times to strict guidelines on the use and disclosure of personal information and are bound by the Privacy Act 1988 (Cth) (the **Privacy Act**) and the National Privacy Principles included therein.

What personal information might we collect and how might we use it?

We may collect personal information such as name, address, e-mail address and contact details. We may obtain credit information from a credit reporting agency or from a credit provider.

As a general rule we do not collect sensitive information. However, if we do, it will usually be for the purposes of engaging with a third party to supply goods and/or services to us, and, where the law requires us to do so, we will seek consent to collect it.

The following table provides an indicative but not exhaustive list of the types of information Novita may seek to collect and the likely purpose for its collection.

Personal Information	What it is used for
Information such as names, business contact details and dealings with suppliers, potential partners and collaborators.	<p>Administration of actual and prospective company contractual dealings with third parties, including but not limited to:</p> <ul style="list-style-type: none"> (i) to assess any request for information by us as part of our due diligence processes for selection of third party suppliers of goods and services, potential project partners and collaborators; (ii) to collect payments in respect of any goods and services provided by us; (iv) to assist with the investigation or resolution of disputes relating to any goods or services provided either to third parties by Novita or by third parties to Novita; (v) to ensure continuity of service, to another company if the supply of the product or service has been transferred to that company; or

<p>Information such as names, contact and back up contact, institution/trust/clinic details, product distribution depot details, product shipment details and professional and practice/business details in respect of professionals and patients associated with Novita clinical trials</p>	<p>To maintain records of medical queries, Adverse Event (AE) and Serious Adverse Event (SAE) reports, to make legally required notifications or implement product recalls, and to monitor Novita's Pharmacovigilance and regulatory compliance with clinical trial and product regulations.</p>
	<p>To carry out marketing activities and organise investigator meetings, conferences, training, seminars or other meetings associated with the preparation for, and conduct of, Novita clinical trials.</p> <p>To facilitate the publication of papers, reports, investigational brochures, posters and any other publications associated with the marketing and awareness of Novita's products.</p>
<p>Access to personal health information provided by clinical trial participants</p>	<p>Prior to participation in any Novita clinical trial each potential patient is required to sign an informed consent to participate in the trial. The information gathered is included within this Informed Consent.</p>
<p>Information such as names and contact details of persons who contact Novita with enquiries, requests for information etc. via the Novita website or other means.</p>	<p>To respond to those requests.</p>
<p>Information received from applicants for positions vacant as advertised by Novita or generally seeking information about employment opportunities within Novita.</p>	<p>To assess those applications or enquiries for employment with Novita.</p>
<p>Information about Novita's employees and contractors relevant to their employment or contract with Novita</p>	<p>To fulfill responsibilities to third parties in the capacity of both employer and contracting party</p>

In addition to the above, in certain circumstances we may be permitted or required by applicable laws to use or disclose personal information, including name, address, transaction history with Novita and other details. Such uses or disclosures may

include, without limitation:

- (i) disclosures to law enforcement agencies for purposes relating to the enforcement of criminal and other laws;
- (ii) uses or disclosures in accordance with orders made by a court or if required or authorised by law;
- (iii) uses or disclosures to lessen or prevent serious threats to an individual's life, health or safety, or to public health or safety; or
- (iv) assistance in the recovery of lost or stolen equipment and in our internal investigations into suspected fraud or other unlawful activities.

Credit checks

As part of due diligence procedures to ensure the quality, reliability and timeliness of supply from potential third party suppliers, we may:

- (i) obtain a credit report from a credit reporting agency containing information about personal credit worthiness; and
- (ii) obtain information about commercial activities or commercial creditworthiness from any business which provides information about the commercial credit worthiness of a third party, third party's accountant or any supplier of goods and/or services to that third party.

We may give to and obtain from any credit provider named in any application for goods and/or services or in a credit report issued by a credit reporting agency, information about credit arrangements for the purposes of:

- (i) assessing a quotation, tender submission, expression of interest, application or other document submitted for our contemplation of entering into a business transaction;
- (ii) notifying a default;
- (iii) allowing another credit provider to ascertain the status of finance arrangements with us in the event of default with one or more other credit providers; and
- (iv) generally assessing credit worthiness.

The information exchanged can include any information about personal and/or commercial credit worthiness, credit standing, credit history or credit capacity which the Privacy Act allows credit providers to give to or receive from each other.

Potential Employment

Upon receipt of an application for a position with Novita, we may collect certain information from the applicant, from any recruitment consultant, from the applicant's previous employer(s) and others who may be able to provide information to us to assist us in our decision on whether or not to make an offer of employment. We will

use this information solely for that purpose.

This policy does not apply to acts and practices in relation to employee records of our current and former employees which are exempt from the Privacy Act.

Cookies

We may log the date and time that someone entered the Novita website. We may use this type of information to track the patterns of visitors using our site and to examine Internet trends and demographics.

This may include identifying which areas on our web site are popular and which areas are not popular. We can collect this information through the use of "cookies".

Information provided via our web site will be used to personalise visits to our web site and to customise our service to our users' needs.

Cookies contain information about your preferences. Cookies are alphanumeric identifiers that a user's web browser transmits to the user's hard drive to enable our system to recognise the browser. This means that we are able to know information about the website user when next he or she visits our site, such as the IP address.

Cookies do not reveal personal identity and are not personal information, but if a user does not want cookies to be collected by us, the Help option of the user's browser's tool bar will instruct how to prevent cookies or disable cookies entirely. The Novita website can still be used even if you choose to disable cookies.

How secure is the information you give to us on our web site?

Novita uses only secure technology when handling personal information on our web site. Where applicable, we also follow strict security procedures for the storage of information in compliance with the Privacy Act.

Links to other sites

For third party convenience and information, our web site contains links to other web sites. Website users should be aware that these links have different security and privacy policies concerning the use of personal information. We do not take any responsibility for links to these web sites.

Access and correction

In accordance with the National Privacy Principles, individuals have certain rights to gain access to the information which we hold and to seek correction of it. If at any time an individual would like to gain access to your personal information, or would like to have some information which we hold about that individual corrected, then the individual is encouraged to contact us at the contact points below. If we cannot give access we will generally inform as to the reasons why.

Children's privacy

Novita does not knowingly collect information from children under the age of 13 and does not target its website to minors in any way. Novita encourages parents and guardians to take an active role in their children's online activities and interests.

Privacy Policy changes

If we change our Privacy Policy at any time, we will update the website for the current policy. If the changes are deemed by us to be material, we may also provide notification by other means.

Users are responsible for periodically checking the Novita website for changes to this Privacy Policy. Continued use of the site after these changes are posted constitutes agreement to the changes with regard to any information collected.

Consent to transfer

Novita reserves the right to sell or transfer personal information provided to us to a third party entity in the event that Novita is acquired by or merged with another company or in connection with the potential sale or transfer of some or all of the Company's business assets.

International users

Regardless of where an individual user may live or do business, by using the www.novitahealthcare.com.au website, the user agrees that we may collect, use, and transfer personal information in accordance with this Privacy Policy.

Queries and complaints

For any queries or further information, or if you wish to make a complaint about the way we have collected, used, held or disclosed your information, then please contact the Novita Company Secretary at info@novitahealthcare.com.au or 1300 082 013.

Novita endeavours at all times to address complaints or disputes regarding personal information promptly and courteously.