

PRIVACY POLICY



BCAL Diagnostics Pty Ltd (BCAL) respects the rights of individuals to privacy and the confidentiality of information about individuals it deals with.

BCAL is required to comply with the Privacy Act 1988 (Cth) (Privacy Act) and handles the personal information that it collects and holds in accordance with the Australian Privacy Principles (APPs) contained in the Privacy Act. For more information on the APPs: Australian Privacy Principles — OAIC

BCAL is committed to the protection of personal and health information in accordance with these privacy laws. By using this site, you agree to the Privacy Policy of this web site which is set out on this web site page.

About BCAL's privacy policy

This privacy policy explains how we collect, hold, use, disclose, secure, and otherwise manage the personal information of individuals who interact with us. It describes the types of information we collect and hold and why, how to access and correct the information and how to make a privacy complaint.

What is personal information?

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable, whether that information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. Sensitive information is a type of personal information that is afforded a higher level of protection by privacy laws. It includes health, genetic and biometric information as well as information about race or ethnic origin, political opinions, membership of political, professional or trade associations or trade unions, religious beliefs, sexual orientation or practices and criminal record. References in this policy to personal information include sensitive information and health information.

What personal information do we collect and hold?

Personal information about visitors to our site is collected only when knowingly and voluntarily submitted.

We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, register on the site, subscribe to the newsletter, fill out a form, and in connection with other activities, features or resources we make available on our Site.

We may collect personal information from you as part of clinical research studies. Information about study participants is usually required to be provided by researchers in a de-identified format (that is, a format in which the identity of the person cannot be reasonably identified). Researchers are required to seek express consent to collect and disclose health related information.

Personal Information

Personal information which may be collected by BCAL includes, but is not limited to the following:
-Contact details including name, telephone number, address, email, phone number

-Qualifications, area of specialty and research interests/expertise

-Expressions of interest in clinical research studies

-Workplace information (e.g., research institute, hospital, university, specialist practice)

-Financial information, including bank details, superannuation, tax file number

-Personal details such as gender, age, date of birth, next of kin, signature, photo

-Employment information such as salaries and wages, education/employment history, curriculum vitae

-Business details such as ABN, contact details (including phone, mobile, email). Other information that is needed to interact with us

We generally collect personal information directly from you. However, we may use other sources such as recruitment agencies, contractors, or business partners to collect personal information.

Health Information

Health information which may be collected by BCAL includes, but is not limited to the following:

- Details of adverse device events (associated with clinical research studies or from our products when they are in the market)
- Details of pathology, surgery, treatment and underlying medical conditions
- Medical images including CT scans, X-rays
- Details of clinic or hospital (including reporter information) at which the adverse event, diagnosis or treatment was obtained
- Medical practitioner details

Collecting personal health information for clinical studies

When interacting with our Site to obtain information about our clinical studies and/or potential participation in our clinical studies, we shall provide you with an information pack directing you to a relevant study institution.

We may collect your geographic location to help guide us as to the best location for you to participate in one of our clinical studies.

Should you be interested, any further personal information shall be collected by the study institution. BCAL may store information related to your participation in a database in accordance with security measures outlined in this Privacy Policy.

Collection of Information

In performing the company's business activities BCAL may collect personal information that relates to employees, contractors, consultants, external providers, patients, doctors, customers, clients, and the wider community.

When collecting information, BCAL takes reasonable steps to make an individual aware of the following: BCAL's contact details (or details of the Privacy Officer)

-The fact that the individual can access their information

- The purpose for collecting the information and to whom it would normally be disclosed to
- Whether the disclosure is required by law

The main consequences of not providing that information is that it might impact upon BCAL's capacity to provide you with the information that you want.

Method of Collection of Personal Information

Personal information is collected through an electronic form (via email or completion of a form on our website). In some instances, information about an individual may be provided via an authorised third party, e.g., the patient's doctor or nurse.

BCAL will only collect personal information about an individual by lawful, secure, and fair means, and not in an unreasonably intrusive way.

Use of Personal Information

The main purposes in collecting personal information about individuals are:

- To respond to an individual's request
 - To maintain contact with individuals and researchers
 - To keep clients and other contacts informed of BCAL research pipeline, our clinical studies, and industry developments that may be of interest to them, and to notify them of service offerings, seminars and other events we are holding
 - For the management and reporting of adverse events
 - For general management and reporting purposes, such as invoicing and account management
 - For recruitment purposes
 - For purposes related to the employment of our personnel and providing internal services to our staff and
 - All other purposes related to our business.
- BCAL may use personal information about individuals to notify them of company updates, educational seminars, clinical studies, and other information, including by email. However, individuals always can elect not to receive further marketing information (Opt- out) by writing to or by emailing us.

If BCAL collects or uses personal information in ways other than as stated in this policy, BCAL will ensure it is undertaken pursuant to the requirements of the Privacy Act.

What trans-border disclosures do we make?

BCAL and its related entities may exchange personal information. As a result, BCAL may transfer personal information outside Australia to countries whose privacy laws do not provide the same level of protection as Australia's. BCAL may need to exchange information to overseas facilities or contractors to process or back-up our information or to provide certain services to us. As a result,

we may transfer personal information to overseas facilities or contractors for these purposes. However, any such transfer of information does not change any of BCAL's commitments to safeguard privacy and the information remains subject to existing confidentiality obligations.

Disclosure of Personal Information

Personal and health information collected and held by BCAL will only be accessed and handled by personnel authorised to do so, for the purpose of carrying out their duties. Apart from the exceptions listed below, BCAL will only use or disclose information for the purpose for which it was collected. BCAL will not use or disclose information about an individual for a secondary or another purpose, other than the main purpose of collection unless any of the following apply:

- The secondary purpose is related to the main purpose of collection, and, in the case of health information, determined by the Privacy Officer to be directly related to the main purpose of collection; and
 - The individual would reasonably expect BCAL to use or disclose the information for the secondary purpose
 - The individual has consented to the use or disclosure
- The use or disclosure is permitted or authorised by Privacy Laws

After notification, the Privacy Officer reasonably believes that the use or disclosure is necessary to lessen or to prevent either:

- o A serious and imminent threat to an individual's life, health, safety, or welfare, or
- o A serious threat to public health, public safety, or public welfare.

Employees and contractors are prohibited from disclosing information about or undertaking transactions on behalf of a customer, doctor, or patient, without the individual's authorisation. This includes disclosure of information to and transactions with partners, relatives, friends, or organisations.

Management and Security of Personal Information

We store personal and health information in both paper and electronic form. The security of personal and health information is very important to us and we take reasonable steps to protect it from misuse, interference and loss and from unauthorised access, modification or disclosure.

Some of the ways we do this include:

Requiring our staff to maintain confidentiality

Implementing document storage security

Imposing security measures for access to our computer systems

Providing a discreet environment for confidential discussions, and

Allowing access to personal and health information only where the individual seeking access to their own information has satisfied our identification requirements.

Personal and health information is retained for the period of time determined by applicable Australian laws after which it is de-identified or disposed of in a secure manner

Privacy on the Website

This policy also applies to any personal information BCAL collects via our websites, and includes information collected via websites of related companies. In addition to personal information provided to BCAL directly (such as where an individual or company makes a request or completes a registration form), BCAL may also collect personal information from you via its websites.

Cookies

Cookies are data that a Web site transfers to an individual's hard drive for record-keeping purposes. Cookies, which are industry standard and are used by most Web sites, including those operated by us, can facilitate a user's ongoing access to and use of a site. They allow us to customise the web site to your needs. If you do not want information collected using Cookies, there is a simple procedure in most browsers that allows you to deny or accept the Cookie feature. But you should note that Cookies may be necessary to provide you with some features of our on-line services.

Links to other sites

We may provide links to Web sites outside of our web sites, as well as to third party Web sites. These linked sites are not under our control, and we cannot accept responsibility for the conduct of companies linked to our website. Before disclosing your personal information on any other website, we advise you to examine the terms and conditions of using that Web site and its privacy statement.

Access

BCAL's privacy policy can be obtained by contacting the Privacy Officer. Personal information held by BCAL may be accessed or corrected by the individual to whom the information belongs. For corrections, the Privacy Officer should be contacted in writing by email or mail. When an individual makes a request to access personal information, BCAL will require them to provide some form of identification (such as a driver's licence or passport) so that BCAL can verify that they are the person to whom the information relates.

How do we keep personal information accurate and up to date?

We take all reasonable steps to ensure that the personal information we collect is accurate, complete, and up-to-date, and when we use or disclose it, that it is relevant. We will also take reasonable steps to correct the personal information we hold if we are satisfied that it is inaccurate, incomplete, and out of date, irrelevant or misleading, or if an individual asks us to correct their personal information for these reasons. A request to correct personal information can be made at any time by contacting us on the details below.

However, the accuracy of that information depends largely on the quality of the information provided to us. We, therefore, suggest that individuals:

- o let us know if there are any errors in their personal information; and
- o keep us up to date with changes to their personal information (e.g., their name and address). Individuals may do this by mail or email using the information provided below. There may be

circumstances in which we may have to refuse a request for correction. If this happens, we will notify the individual in writing of our reasons for the refusal and explain how they can complain if they are not satisfied

Changes to this privacy policy

BCAL has the discretion to update this privacy policy at any time. When we do, we will revise the updated date at the bottom of this page. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

Your acceptance of these terms

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes

Complaints or Enquiries

Any complaints about BCAL's handling of personal information or enquiries about this policy are to be directed to the Privacy Officer.

Privacy Officer: Guy Robertson

Email: GRobertson@bcaldiagnostics.com

For more information about privacy issues in Australia and protecting your privacy, visit the Australian Federal Privacy Commissioner's web site. <http://www.privacy.gov.au/>

