

1. Introduction

Your privacy is important to PHM and PHM has developed this Privacy Policy that covers how PHM collects, uses, discloses, transfers and stores your personal information provided to PHM, or otherwise collected by PHM, offline or online, including through PHM's platforms, websites and mobile applications ('Platforms'). In this Privacy Policy 'PHM' means Project Health Monitoring Pty Ltd (ABN: 73 637 403 242).

2. Types of personal information PHM collect

PHM may ask you to provide Personal Information when you interact with PHM.

The types of personal information PHM may collect about you including your name, images of you (for example from your profiles), your contact details (including email and website addresses, mailing address, street address and/or phone numbers), user IDs and passwords, your age and/or date of birth, your credit card or payment details (through PHM's third party payment processors), your preferences and/or opinions, information you provide to PHM through customer surveys, your sensitive information as set out below, details of products and services PHM has provided to you and/or that you have enquired about, and PHM's response to you, your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour, information about your access and use of the Platforms, including through the use of internet cookies, your communications with the Platforms, the type of browser you are using, the type of operating system you are using and the domain name of your internet service provider, additional personal information that you provide to PHM directly or indirectly, through your use of the Platforms, associated applications, associated social media platforms and/or accounts from which you permit PHM to collect information, and any other personal information requested by PHM and/or provided by you or a third party.

PHM may collect these types of personal information directly from you or from third parties.

3. Collection and use of personal information

PHM may collect, hold, use and disclose personal information for the following purposes: (a) to enable you to access and use the Platforms, associated applications and associated social media platforms; (b) to contact and communicate with you; (c) for internal record keeping, administrative purposes, invoicing and billing purposes; (d) for analytics, market research and business development, including to operate and improve the Platforms, associated applications and associated social media platforms; (e) to run competitions and/or offer additional benefits to you; (f) if applicable, consider your employment application; (g) for advertising and marketing, including to send you promotional information about PHM's products and services and information about third parties that PHM considers may be of interest to you; and (h) to comply with PHM's legal obligations and resolve any disputes that PHM may have.

4. Disclosure of personal information to third parties

PHM may disclose personal information to: (a) third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators; (b) PHM's employees, contractors and/or related entities; (c) if you are an employee of an employer that uses the Platforms, provide that personal information to that employer; (d) PHM's existing or potential agents or business partners; (e) sponsors or promoters of any competitions PHM runs; (f) anyone to whom PHM's business or assets (or any part of them) are, or may (in good faith) be, transferred; (g) credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services PHM has provided to you; (h) courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend PHM's legal rights; third parties, including agents or sub-contractors, who assist PHM in providing information, products, services or direct marketing to you. This may include parties located, or that store data, outside of Australia; (i) third parties to collect and process data, such as Google Analytics or other relevant businesses. This may include parties that store data outside of Australia; and (j) where PHM discloses your personal information to third parties, PHM will request that the third party handle your personal information in accordance with this Privacy Policy.

5. Overseas Transfer

By providing PHM with personal information, you consent to the disclosure of your information outside of Australia and acknowledge that PHM is not required to ensure that overseas recipients handle that personal information in compliance with Australian Privacy law. You acknowledge that some overseas third parties may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act and if any third party engages in any act or practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act and you will not be able to seek redress under the Privacy Act.

6. Sensitive information

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Australian Privacy Principles. 'Sensitive information' means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.

The type of sensitive information PHM may collect about you includes financial information and generic health information that you provide to PHM through the Platform or App.

PHM will not collect sensitive information about you without first obtaining your consent. Provided you consent, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected, including: (a) providing services for a purpose that is directly related to the primary purpose for which the sensitive information was collected; (b) data analytics purposes; (c) referring you to medical or health service providers in circumstances where it is impractical for PHM to obtain your consent.

Sensitive information may also be used or disclosed if required or authorised by law.

7. Your rights and controlling your personal information

7.1 **Choice and consent:** Please read this Privacy Policy carefully. By providing personal information to PHM you consent to PHM collecting, holding, using and disclosing your personal information in accordance with this Privacy Policy. You do not have to

provide personal information to PHM, however, if you do not, it may affect your use of the Platforms or the products and/or services offered on or through the Platforms.

- 7.2 **Information from third parties:** If PHM receives personal information about you from a third party, PHM will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to PHM.
- 7.3 **Restrict:** If you have previously agreed to PHM using your personal information for direct marketing purposes, you may change your mind at any time by contacting PHM using the details below.
- 7.4 **Access:** You may request details of the personal information that PHM's holds about you. An administrative fee may be payable for the provision of such information.
- 7.5 **Correction:** If you believe that any information PHM holds about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact PHM using the details below. PHM will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.
- 7.6 **Complaints:** If you wish to make a complaint about how PHM has handled your personal information, please contact PHM using the details below and provide PHM with full details of the complaint. PHM will promptly investigate your complaint and respond to you, in writing, setting out the outcome of PHM's investigation and the steps PHM will take to deal with your complaint.
- 7.7 **Unsubscribe:** To unsubscribe from PHM's e-mail database or opt-out of communications (including marketing communications), please contact PHM using the details below or opt-out using the opt-out facilities provided in the communication.

Storage and security: PHM takes all reasonable steps to protect your personal information. In order to prevent unauthorised access or disclosure, PHM has put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure. PHM cannot guarantee the security of any information that is transmitted to or by PHM over the internet. The transmission and exchange of information is carried out at your own risk. Although PHM takes measures to safeguard against unauthorised disclosures of information, PHM cannot assure you that the personal information PHM collects will not be disclosed in a manner that is inconsistent with this Privacy Policy.

8. Cookies and web beacons

The Platforms use PHM's and third-party 'cookies' to enable you to sign in to PHM services and to help personalise your online experience. These technologies and the information collected about you may be used to track your activity across multiple devices. Where appropriate, PHM use cookies to store your preferences and other information on your computer in order to save you time by eliminating the need to enter the same information repeatedly.

A cookie is a piece of text that is placed on your computer's hard drive. Depending on the settings you have selected, your browser adds the text to your device as a small file. Many browsers are set to accept cookies by default. You have the ability to accept or decline cookies as you prefer. The help portion of your web browser, most likely found on the toolbar, typically tells you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

Cookies allow you to take advantage of some of PHM's essential features, including allowing you to save items and remembering items between visits. If you choose to decline cookies, you may not be able to sign in or use other interactive features of Platforms and services that depend on cookies.

PHM and PHM's partners may use web beacons on the Platforms from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

PHM may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see <https://policies.google.com/technologies/partner-sites> or any other URL Google may use from time to time.

9. Links to other websites

Please be aware that PHM provides links to other websites. PHM does not have any control over those websites and PHM are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

10. Social Media Features

The Platforms may include social media features, including Facebook 'Like' button and Twitter 'Follow' button. These features may collect your IP address, which page you are visiting on the Platforms, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on the Platforms. Your interactions with these features are governed by the privacy policy of the company providing them.

11. Amendments

PHM may, at any time and at PHM's discretion, vary this Privacy Policy by publishing the amended Privacy Policy on the Platforms. PHM recommends you check the Platforms regularly to ensure you are aware of PHM's current Privacy Policy.

For any questions or notices, please contact PHM's Privacy Officer at:

Project Health Monitoring Pty Ltd (ABN: 73 637 403 242)

Email: tpoke@projecthealthmonitoring.com.au

Last update: 3 August 2020