

Privacy policy

1. Welcome to HootHealth! We value your privacy and we work hard to protect the information you provide to us.
2. We respect your rights to privacy and have a legal obligation to abide by the provisions of the Privacy Act 1988 (Cth) (**Privacy Act**). The rules that an organization must follow under the Privacy Act are known as the Australian Privacy Principles (**APPs**) and cover areas including the collection, use, disclosure, quality and security of personal information. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or collected by us, offline or online, including through our services, our website and our telehealth introductory platform and pharmacy introductory platform (**Services**). In this Privacy Policy we, us or our means Wellnet Pty Ltd ACN 674 790 142.

Personal information

3. The types of personal information we may collect about you include (but are not limited to):
4. **As a patient:**
 - 4.1. your name;
 - 4.2. your date of birth;
 - 4.3. your contact details, including email address, mailing address, street address and telephone number;
 - 4.4. your credit card or other payment details (through our third party payment processor);
 - 4.5. your sensitive information as set out below;
 - 4.6. images of you for your profile;
 - 4.7. your preferences and/or opinions;
 - 4.8. your general practitioner's details;
 - 4.9. information you provide to us through patient surveys;
 - 4.10. details of your request and any other services or support we have provided to you and/or that you have enquired about, and our response to you; and
 - 4.11. any other personal information requested by us and/or provided by you or a third party
5. **As a user of our Services:**
 - 5.1. your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behavior;
 - 5.2. information about your access and use of our Services, including through the use of Internet cookies, your communications with our online Services, the type of

- browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- 5.3. additional personal information that you provide to us, directly or indirectly, through your use of our Services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
 - 5.4. any other personal information about your use of the Services requested by us and/or provided by you or a third party
6. We may collect these types of personal information directly from you or from third parties. Where you do not wish to provide us with your personal information, we may not be able to provide you with the requested Services.

How we treat personal information that is also sensitive information

7. 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.
8. The types of sensitive information we may collect about you include (but are not limited to):
 - 8.1. As a patient: your health information such as medical records, medication prescriptions, imaging, test results, the clinical letters provided by a doctor.
 - 8.2. As a doctor or pharmacist: information about your criminal history and working with children check.
9. We will not collect sensitive information about you without your consent, unless required or authorized by law.
10. Where you consent, your sensitive information may only be used and disclosed for the primary purpose for which it was collected and for reasonably expected purposes directly relating to the primary purpose for which the sensitive information was collected.
11. Sensitive information may also be used or disclosed if otherwise permitted, required or authorized by law.

Collection and use of personal information

12. We may collect, hold, use and disclose personal information for the following purposes:
 - 12.1. to enable you to access and use our Services, and associated applications;

- 12.2. as a patient; for the doctors and pharmacists to provide their services to you as a patient, including to hold your telehealth consult or fill your medication order (as applicable);
- 12.3. if you have applied to be a doctor or pharmacist on our introductory platform; to consider your application;
- 12.4. to contact and communicate with you about our Services;
- 12.5. for internal record keeping, administrative, invoicing and billing purposes;
- 12.6. for analytics, market research and business development, including to operate and improve our Services and associated applications;
- 12.7. to offer additional benefits to you;
- 12.8. for advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you; and
- 12.9. to comply with our legal obligations and resolve any disputes

Disclosure of personal information to third parties

13. We may disclose personal information to:

- 13.1. as a patient, doctors and pharmacists as required for them to provide their services to you as a patient, including to hold your telehealth consult or fill your medication order (as applicable);
- 13.2. third party service providers for the purpose of enabling them to provide their services to us, 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;
- 13.3. as a doctor or pharmacist, patients as required to allow patients to use our Services and benefit from your services;
- 13.4. our employees, contractors and/or related entities;
- 13.5. our existing or potential agents or business partners;
- 13.6. sponsors or promoters of any additional benefits we offer;
- 13.7. anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- 13.8. credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services provided to you;
- 13.9. 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 our legal rights;
- 13.10. third parties to collect and process data, such as data analytics businesses. This may include parties that store data outside of Australia;
- 13.11. regulatory bodies, doctors or allied health professionals if it is unreasonable or impracticable to obtain your consent and we reasonably believe that the

- disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety; and
- 13.12. any other third parties as permitted by law, authorised by law or required by law

14. **Disclosure overseas:** We may disclose personal information overseas. The countries to which we send personal information for the purposes listed above may not have the same privacy laws as Australia. If we disclose your personal information to third parties in other countries we will perform those disclosures in accordance with the requirements of applicable law.

Your rights and controlling your personal information

15. Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect your use of our Services.
16. If we receive personal information about you from a third party, we 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 us.
17. Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.
18. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below. You may also unsubscribe from our email database or opt-out of marketing communications by using the opt-out facilities provided in the communication.
19. You may request details of the personal information that we hold about you. An administrative fee may be payable for the provision of such information.
20. If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

Storage and security

21. We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal information and protect it from misuse, interference, loss and unauthorized access, modification and

disclosure. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.

22. We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorized disclosures of information, we cannot guarantee that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.
23. If we become aware that unauthorized access, disclosure or loss of your personal information has occurred, we will activate our data breach plan and use all reasonable steps to minimize any risk of serious harm. Where applicable, we will carry out notification of a data breach in accordance with our legal obligations.

Cookies and web beacons

24. We may use cookies on our online Services from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online Services with personal information, this information may be linked to the data stored in the cookie.
25. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our online Services.
26. We may use web beacons on our online Services 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.

Links to other websites

27. Our Services may contain links to other websites. We do not have any control over those websites and we 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.

Amendments

28. We reserve the right to change the terms of this Privacy Policy from time to time, without notice. An up-to-date copy of our Privacy Policy is available on our Website and we encourage you to check our website periodically to make sure you are aware of our current Privacy Policy.

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please direct your enquiries to our Privacy Officer at admin@hoothealth.com.au.

Your experience with HootHealth is important to us. We endeavor to respond to any complaint within a reasonable period.