



The *Privacy Act (1988)* and the Office of the Australian Information Commissioner (OAIC) have laid out the Australian Privacy Principles (APPs) and the APP guidelines (<https://www.oaic.gov.au/agencies-and-organisations/app-guidelines/>). These guidelines require each APP entity to have a clearly expressed and up-to-date APP privacy policy, describing how it manages private information.

This policy describes how we collect and store personal information at Q-Pharm Pty Limited, including:

- Why we collect personal information
- How we use the personal information that we have collected
- What personal information is collected
- How we secure personal information
- When we will disclose personal information
- Website analytics and cookies
- What you can do if you would like to access, change or remove your personal information

### Definitions

In this Privacy Policy, we define *personal information* in the same way as it is defined in the *Privacy Act (1988)*, as

*...information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.*

*Sensitive Information* is a sub-type of personal information and includes information about an individual's:

- health
- racial or ethnic origin
- 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
- biometric information that is to be used for certain purposes
- biometric templates

*Health information* is further defined in the *Privacy Act (1988)* as:

- information or an opinion about:
  - the health or a disability (at any time) of an individual; or
  - an individual's expressed wishes about the future provision of health services to him or her; or
  - a health service provided, or to be provided, to an individual that is also personal information; or
- other personal information collected to provide, or in providing, a health service; or

- other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

***Why we collect personal information and how we use the personal information that we have collected***

We collect personal information from participants in our clinical trials, from people who register on our database as potential clinical trial participants, and from people who register an expression of interest in participating in clinical trials at Q-Pharm Pty Ltd through phone calls, emails and other social media.

We collect personal information so that we can:

- ensure the safety of all our participants;
- identify potential participants for new clinical trials;
- make sure we are complying with our legal and regulatory obligations.

Collection of personal information will allow us to:

- ensure your safety when participating in a clinical trial;
- communicate effectively with you;
- provide you with clinical trial information;
- send you information about new clinical trials;
- give you news updates from Q-Pharm Pty Ltd (with your permission).

***What personal information is collected***

We may collect the following information from you:

- Name
- Title
- Date of birth
- Residential address
- Postal address
- Email address
- Phone number
- Driver's license number and expiry date, or another form of identification if you do not have a driver's license
- Medicare card number
- Bank account details
- Employment details
- Racial or ethnic origin
- Cultural background
- Physical health history
- Mental health history

- Measurements of height, weight and other physiological measures, such as temperature, heart rate, blood pressure etc
- Information about other lifestyle factors, such as smoking, alcohol consumption, use of drugs, diet etc
- Specific health information may be collected if you are participating in a clinical trial

***How we secure personal information and when we will disclose personal information***

Q-Pharm Pty Ltd records are stored in locked offices in a controlled facility, and on secure computer servers in Australia and abroad. We adhere to the highest levels of privacy, confidentiality and data security, and we take all reasonable steps to protect personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

These steps include protection of your personal information through:

- Strict governance, standards, company culture and training
- Strong internal practices, procedures and systems
- Mandated ICT security and regular audits
- Secure access to the facility
- Adherence of third party providers (including cloud computing and use of secure servers in controlled facilities) to international IT security guidelines
- Audit trail of changes to personal information to prevent data breaches
- High levels of physical security

Access to your personal information is restricted to people who have an operational requirement to see the information, to regulators and to legislative authorities. These include, but are not limited to:

- Q-Pharm Pty Ltd staff
- Auditors and monitors appointed by Sponsors, certifying authorities and ethics committees
- The Australian Federal Police
- The Australian Taxation Office
- The Office of the Australian Information Commissioner
- The Commonwealth Ombudsman

Q-Pharm Pty Ltd will never give your personal information to a third party, and will only disclose your personal information if:

- This disclosure is required for operational, regulatory or legislative purposes
- You have consented to disclosure of your personal information
- You would reasonably expect the disclosure, such as when your personal information is already in the public domain
- The disclosure of the personal information is required or authorised by or under an Australian law or a court/tribunal order
- A permitted general situation exists in relation to the disclosure of the personal information
- A permitted health situation exists in relation to the disclosure of the personal information
- We believe that the disclosure is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body

### ***Website analytics and cookies***

To improve your experience on our site, we may use 'cookies'. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

Our website uses a range of tools provided by third parties, such as Google Analytics, to collect or view website traffic information. These sites have their own privacy policies and we are not responsible for the privacy practices of other business – or the content of websites that may be linked to our website.

By using this website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you use the opt-out service provided by Google.

Qpharm.com.au also uses interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other Personal Information.

### ***What you can do if you would like to access your personal information and/or if you wish to change/correct/remove your personal information***

Under Australian law, you have the right to ask for access to the personal information that Q-Pharm Pty Ltd holds about you, by contacting the CEO of Q-Pharm Pty Ltd. If you do request access to your personal information, please specify what information you require, and we will respond within a reasonable period of time, usually within 30 days. You may also request how you wish to access your personal information, as long as it is reasonable and practicable.

Q-Pharm Pty Ltd aims to keep all personal information accurate and up-to-date. We encourage you to let us know of any updates to your personal information and contact details. If you feel that the personal information that we hold about you is inaccurate, we will take all reasonable steps to correct personal information to ensure it is accurate, up-to-date, complete, relevant and not misleading.

You also have the right to ask us to remove your personal information that is held by Q-Pharm Pty Ltd.

Q-Pharm Pty Ltd may refuse to give access to, or remove, personal information on any of the following grounds:

- If we believe that giving access/removing personal information would pose a serious threat to the life, health or safety of any individual, or to public health or public safety
- If giving access/removing personal information would have an unreasonable impact on the privacy of other individuals
- If the request for access/removing personal information is frivolous or vexatious
- If giving access or removing the personal information would be unlawful

- If denying access is required or authorised by or under an Australian law or a court/tribunal order
- If we have reason to suspect unlawful activity or misconduct of a serious nature

### **Contact Us**

If you would like to make and comments or recommendations on our Privacy Policy, or if you have any questions, concerns or complaints about the Privacy Policy or the way that we manage your personal information, please contact us by email on [enquiries@qpharm.com.au](mailto:enquiries@qpharm.com.au) or phone us on +61 (0)7 3845 3636 or visit our website at [www.qpharm.com.au](http://www.qpharm.com.au)

Q-Pharm Pty Ltd reserves the right to alter its privacy policy, from time to time. Any alterations to this policy will be posted on our web-site in a timely manner, and will comply with privacy principles.