

PHARMACY ALLIANCE GROUP PRIVACY POLICY

PHARMACY ALLIANCE GROUP AND THE SCOPE OF THIS PRIVACY POLICY

This Privacy Policy sets out how Pharmacy Alliance Group Holdings Pty Limited ABN 73 609 137 546, its subsidiaries, including Pharmacy Alliance Pty Ltd ABN 92 103 792 310, Alliance Pharmacy Pty Ltd ABN 56 602 268 664, Pharmacy Platform Pty Ltd ABN 53 105 944 321, Advantage Pharmacy Pty Ltd ABN 73 092 158 275, Chemist Discount Centre Services Pty Ltd ABN 46 160 755 439, Pharmacy Catalyst Pty Ltd ABN 79 127 111 773, BuyItRight Pty Ltd (ABN 81 629 019 405), EasyClinic Pty Ltd (ABN 63 607 972 742) and Magikos Marketing Pty Ltd (ABN 90 168 307 640) trading as Knowitall Loyalty Systems (together the **Pharmacy Alliance Group** or **we, us or our**) manage and treat Personal Information in the course of the Pharmacy Alliance Group's business activities

The activities of the Pharmacy Alliance Group include providing various services and benefits to support pharmacies, whether as independent pharmacies or pharmacies trading under the Pharmacy Alliance Group trademarks, (including under franchise arrangements). These services include providing access to discounts and rebates relating to the purchase of pharmaceutical and other products, marketing support (including marketing support for clinics run by pharmacies under the *EasyClinic* brand), providing access to purchasing technology systems, business analytics support and access to loyalty programs for pharmacy customers. These loyalty programs are known as Healthy Rewards for Alliance Pharmacies, LifeClub for Catalyst members, Club Card for Chemist Discount Centre Pharmacies and A-List for Advantage Pharmacies.

In addition, Chemists Discount Centre Services Pty Ltd also operates an online site where consumers may place orders for products (including prescriptions). This online website facilitates the purchase of products from franchisee pharmacies operating under the "Chemists Discount Centre" brand that we support.

The pharmacies that the Pharmacy Alliance Group support (including franchisee pharmacies) may operate under various brands or trade marks licensed to them by entities within the Pharmacy Alliance Group, including "Advantage", and "Chemist Discount Centre" and "Alliance Pharmacy". However, those pharmacies are not owned by Pharmacy Alliance Group Holdings, and for the purposes of this Privacy Policy are not considered part of the Pharmacy Alliance Group. If you have any concerns about Personal Information you have provided to your pharmacy outside of any loyalty program you should contact them directly.

DEFINITIONS

Personal Information generally means information or opinions about an individual who is reasonably identifiable from that information. Personal Information includes Health Information, Sensitive Information and Credit Information.

Health Information includes information or opinions about the health of a person or health services provided to them.

Sensitive Information includes information or opinions about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, as well as Health Information, genetic information and biometric information.

Credit Information includes the type and amount of credit being sought in a credit application, repayment history information about an individual, payment information about an individual and default information about an individual.

Terms are more fully defined in the Privacy Act.

WHAT TYPES OF PERSONAL INFORMATION DOES THE PHARMACY ALLIANCE GROUP COLLECT, HOW IS IT COLLECTED AND FOR WHAT PURPOSE IS IT USED?

Types of personal information collected

The type of personal information collected by the Pharmacy Alliance Group depends on the type of transaction you undertake with us. This could include: your name, contact details, other identifying information such as date of birth or gender; information about you that you give us when you complete application forms, make inquiries or purchase goods or services from us (which may include Health Information such as a prescription); and information that we are required by law to collect. We typically would seek to collect information relevant to the purpose for which it is collected. For example, if you book a place in, or attend, a health clinic or other event, then information relevant to your participation in the event will be collected. If you take part in a loyalty programme, then information relevant to your participation in the programme will be collected (this may include your preferences relating to the type of products you may be interested in). If you are applying for a position with the Pharmacy Alliance Group, then information required for us to contact you and to assess your application will be collected. Any curriculum vitae submitted to us will not be used for marketing purposes.

Collection of personal information

Pharmacy Alliance Group seeks to collect personal information directly from you unless it is unreasonable or impracticable to do so. We collect personal information in various ways such as: when you upload material to, or contact us via one of our social media channels or websites; when you place orders online; when you apply to be a pharmacy aligned with the Pharmacy Alliance Group; when you apply for an employment position with Pharmacy Alliance Group; when you complete a customer feedback survey or other form; when you participate in one of our loyalty programmes; or when you email, post or telephone us with respect to our products, services or events.

Use of personal information

We use your personal information for the following purposes: to verify your identity and check it is current and accurate; to facilitate the purchase of products and services that you have requested; to administer and manage those products and services requested (including for invoicing purposes); to respond to your requests, queries and complaints; for our own internal operational purposes and to understand our customer base, including size, interests and trends; to maintain, develop and improve our business systems and processes; to comply with laws and regulations that apply to us and our business and/or to contact you regarding your job application and to assess your job application (where you have applied for a position with us).

Where you have consented to receive marketing information, we also use your personal information to contact you with updates, newsletters, competitions, special offers or promotional information and to conduct product and market research. We will give you a choice as to whether you wish to receive these communications and you may contact us to let us know if you wish to cease receiving further communications and we will take steps to ensure that you do not receive any further communications.

Disclosure of personal information

We may disclose your personal information to entities within Pharmacy Alliance Group, to our service providers and other persons for the purpose of using your Personal Information as disclosed above. These include:

- those involved in providing, managing or administering a product or service you request;
- pharmacies who are the ultimate supplier of online products you may order;
- pharmacists or other health professionals, who may need to verify any Health Information you provide in connection with administering a prescription, product or service you request;
- loyalty program partners;
- organisations that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems or that assist with our product planning, research and development;
- mailing houses and telemarketing agencies who assist us to communicate with you;
- organisations that participate with us in payments systems including merchants, payment organisations and organisations that produce cards, cheque books or statements for us;
- other organisations involved in our normal business practices, including our related entities, agents and contractors and service providers;
- any organisations that are involved in any proposed transfer or sale of our business or assets;
- any entity to which we are required or authorised by or under law to disclose such information and

- any other persons that you consent to us disclosing your information to (whether impliedly or expressly), including your guarantor or referee.

If you elect to participate in any promotions, competitions, sweepstakes, surveys, questionnaires or other events, the rules or terms and conditions for those events may include your agreement to your Personal Information being shared with third parties. By choosing to participate and submitting your Personal Information in that manner, you consent to disclosure of your Personal Information to such third parties in accordance with those rules or terms and conditions.

From time to time, Pharmacy Alliance Group may use third party IT service providers in the conduct of its business, who may store customer information in servers located in other countries, such as in New Zealand and the USA.

Credit Information

Entities within the Pharmacy Alliance Group may collect your Credit Information if you are a pharmacy owner or an individual guarantor of a pharmacy business, for the purposes of assessing any application for credit. The types of information collected include your name, contact information, the name and contact details of any of your business partners, the name and ABN of your pharmacy business, your pharmacy registration number, your trading history, the credit being requested, the delivery address for goods and business references. In addition, we may obtain a *Risk of Late Payment* report. It is the general practice of the Pharmacy Alliance Group not to disclose any Credit Information to third parties, except that Pharmacy Alliance Group may disclose to a debt collector Credit Information of an individual owner of a pharmacy that owes us membership fees or other amounts as permitted by law.

Consequences of not providing your Personal Information

If you do not provide your personal information to us, in connection with a request for goods or services we may not be able to provide you with the product or service you want. Where you advise us you do not wish to receive any marketing material, we may be able to let you know about other products or services that might better meet your needs

Pharmacy Alliance Group websites

When you visit our websites or use other online resources or apps provided by any entity within the Pharmacy Alliance Group, we may collect information about your computer or electronic device (eg your Internet Protocol (IP) address, browser type, and date and time of your request) by using automatic systems of browsing data collection, such as cookies. A cookie is a file stored on your hard drive; it does not contain intelligible information, but it allows linking between a terminal and information about your preferences. These tracking technologies are used to provide additional functionality to your use of our resources; for example, to remember your preferences and selections. You may limit or remove cookies from your computer or device, but, in these situations, our ability to provide optimal service may be limited. By using any website of the Pharmacy Alliance Group, you consent to the use and installation of these cookies and web beacons to provide you with these services.

By using websites, online resources, apps, or any other service of an entity within the Pharmacy Alliance Group, you also consent to the storage and handling of any Personal Information collected in accordance with this Privacy Policy or any update to it

Storage and Security of Personal Information

The Pharmacy Alliance Group will take commercially reasonable steps to keep secure all Personal Information from misuse, interference, loss and unauthorised access. However, we cannot guarantee that third parties will never be able to defeat our security measures or use your Personal Information for improper purposes; for example, we do not control or monitor web sites to which we may provide a link. Our Privacy Policy does not apply to third party web sites.

Personal Information is stored on secure servers that are protected in controlled facilities, or in hardcopy paper records stored in secure access facilities. The Pharmacy Alliance Group requires its employees and data processors to protect the confidentiality of any Personal Information held by us.

Accessing your Personal Information

If at any time you want to update or know what Personal Information (including Credit Information) the Pharmacy Alliance Group holds, you are welcome to access your record by contacting the Pharmacy Alliance Group using the details set out below. Your information will generally be made available to you within a reasonable period of receiving your request.

If you make such a request, you will be asked for identification so that we can verify your identity before providing you with your Personal Information. If you require Personal Information to be presented in an alternative format, we will make reasonable efforts to accommodate you. If there is an associated charge to us in order to retrieve your Personal Information, we will advise you of the charges that you would be responsible for and obtain your authorisation before proceeding.

We may not be able to give you access to Personal Information where such access would result in disclosure of other individuals' Personal Information, would result in a breach of a contract, or would result in disclosure of trade secrets or other proprietary business information belonging to Pharmacy Alliance Group or a third party.

The Pharmacy Alliance Group reserves the right to not provide access to individuals if the request for access is frivolous or vexatious, or falls into another relevant exception category.

We may impose reasonable charges for such access.

Amending or deleting your Personal Information

The Pharmacy Alliance Group will take reasonable steps to ensure Personal Information (including Credit Information) is accurate, up-to-date and complete and notify you of any such changes. If you wish to update your Personal Information, please contact us to amend your record accordingly.

If you wish to have your Personal Information deleted, please contact us and we will take all reasonable steps to delete it. In circumstances where we are required to retain Personal Information, we may not be able to delete your Personal Information. Such circumstances may include, for example, where we are required to retain Personal Information by law or regulation, to continue to manage certain programs, to defend legal claims, or for certain necessary business purposes.

Contact us

Please contact us if you have a complaint regarding the Pharmacy Alliance Group's compliance with this policy or any applicable privacy laws. The Pharmacy Alliance Group will consider and respond to a complaint within a reasonable time frame. In addition, please contact us if you wish to discuss any privacy issues, have any concerns regarding your Personal Information or do not wish to receive any future communications from any entity within the Pharmacy Alliance Group.

You can contact the Pharmacy Alliance Group's through the following means:

By Post:

Pharmacy Alliance Group Holdings Pty Ltd
Attn: Privacy Officer
Level 4, 111 Coventry Street, Southbank, VIC

By e-mail: privacy@thepagroup.com.au (and specifying in the subject line "Privacy Policy")

The Pharmacy Alliance Group's commitment to being a leading player within the pharmacy and pharmaceutical industry means its business will continue to evolve as new services and products are introduced. Because of this, from time to time, its policies may be reviewed and revised, and we reserve the right to amend or replace

its Privacy Policy at any time. The Pharmacy Alliance Group will notify you of any such changes by posting an updated version of the Privacy Policy on their websites.

Should there be a discrepancy between this Privacy Policy and the applicable legislation at any time, the applicable legislation at that time will prevail.