

InterPharma Pty Ltd

InterPharma Privacy Policy

Last updated September 2023

InterPharma Pty Ltd ABN 19 099 877 899 (**we, our, us**) is bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**). This InterPharma Privacy Policy (**Privacy Policy**) explains if, when, how and why we collect, use, hold and disclose your personal information when supplying, or in relation to our supply of, products, services and the functions of our business.

This Privacy Policy does not cover or apply to patients and consumers of Apomine therapy or ANSSER that is administered by Ascott Sales Integration Pty Ltd on our behalf, or carers of those patients and consumers (each, a **patient or consumer**). If you are a patient or consumer, please refer to our [ANSSER Privacy Policy](#).

Who we collect personal information from?

This Privacy Policy covers our collection of personal information from persons that are not patients or consumers, and provide us with their personal information. This includes, (but is not limited to):

- Health care professionals: doctors, pharmacists, nurses, hospitals and hospital staff;
- Persons who contact us.

What personal information do we collect and hold?

Our policy is to limit the amount of personal information we collect about you.

We collect:

- Basic identifying information including your name;
- Contact details including email, phone and fax address;
- Where you are a healthcare professional, name and details of the healthcare practice where you work, including business address;
- Where you are a healthcare professional, your medical specialty;
- Name and contact details of your employer and your position in the company; and
- Details of our interactions with you – for example, if you are a healthcare professional details of conversations we have with you.

We may collect information about access to, use of and interactions with our website (www.interpharma.com.au), including the number of times a webpage or video on our website has been accessed, and how many people have downloaded content from our website, and which content, and how many people have scanned QR codes on our

website. The information we collect does not include personal information such as your IP address. We do not use cookies on our website.

Our website may contain links to other websites that we think may be of interest to you. However, we are not responsible for the privacy practices or content of such websites. When accessing third party websites, you should always check their privacy policy before providing any personal information.

How do we collect your personal information?

We collect your personal information:

- When you voluntarily provide us with your personal information such as when you contact us by phone, email, mail or fax;
- When you provide it to us in the course of doing business with us, or your employer provides it to us in the course of doing business with us;
- If you are a doctor, by obtaining your name, speciality, the name of your employer or the location from which you work and your phone number, from third parties with whom we have contractual arrangements under which we may receive your personal information;
- When you interact with us in, or in relation to, your provision of services as a healthcare professional.

Why do we collect, hold and use your personal information?

We collect, hold and use your personal information, so that we can:

- (a) respond to your queries or complaints about our products and/or services, or undertake another action in relation to your query or complaint;
- (b) notify you of important matters we may be required by law to notify you of (e.g. product recalls) in connection with our products and/or services, or otherwise where we notify you of information that is of relevance to you (e.g. adverse reports);
- (c) market our products and/or services we believe are of relevance to you;
- (d) invite you to our events;
- (e) improve our products and/or services;
- (f) comply with our legal obligations and assist government and law enforcement agencies or regulators in connection with our products and/or services; and
- (g) to fulfil our contractual obligations, including to you or other entities to whom we have contractual obligations.

Who do we disclose your personal information to, and why?

We may disclose personal information about you that we hold to our parent company, EVER Pharma of Oberburgau 3 4866 Unterach, Austria, for the purposes of business management, analysis and improvement of our products and/or services.

We may also disclose your personal information that you provide directly to us to government and law enforcement agencies or regulators where:

- (a) we are required or authorised by law to do so;
- (b) you have expressly consented to the disclosure (for instance, to your doctor) or the consent may be reasonably inferred from the circumstances; or
- (c) we are otherwise permitted to disclose the information under the Privacy Act.

If the ownership or control of all or part of our business changes, or if we undergo a corporate restructure, or acquire any new entities, we may transfer your personal information or de-identified information that we hold to our parent company or another related entity. We will not otherwise sell your personal information.

Do we disclose personal information to overseas recipients?

We do not disclose personal information to any recipient located overseas, other than to our parent company, EVER Pharma.

How do we store and hold personal information?

We store the personal and de-identified information referred to in this Policy in cloud-based customer relationship management (CRM) software called *Salesforce*. Our Salesforce account is managed by our parent company, EVER Pharma. The data in that Salesforce account is hosted in Europe.

How do we protect your personal information that we hold?

Our processes, systems and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure include:

- (a) requiring all of our employees to comply with internal information security policies and keep information secure;
- (b) complying with the security policies of the CRM provider that apply to our use of the CRM;
- (c) requiring all of our employees to complete training about information security and to comply with privacy and confidentiality provisions in agreements that we enter into with them;
- (d) monitoring and regularly reviewing our business against our own policies and against industry best practice;
- (e) maintaining physical security measures in our buildings and offices such as door and window locks and visitor access management, cabinet locks, surveillance systems and alarms to ensure the security of information systems;
- (f) having data backup, archiving, data breach response plans and disaster recovery processes in place; and
- (g) implementing passwords and access control procedures into our computer systems and cloud-based accounts.

We will take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the Australian Privacy Principles.

Do we use your personal information for marketing?

We may use your personal information to offer you products and services via marketing communications, including by email or phone. You may opt out at any time from receiving marketing communications from us by emailing admin@interpharma.com.au or by using the opt out facility we provide in each of our marketing email communications.

Opting out of future communications from us does not preclude us from contacting you where we are authorised or required to do so under law.

Access to and correction of your personal information

You may access or request correction of the personal information that we hold about you by contacting us at admin@interpharma.com.au. There are some circumstances in which we are not required to give you access to your personal information.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material) unless we are not permitted to do so by applicable law.

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date and complete.

Complaints

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, please contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain dissatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (OAIC) (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

Contact details

If you have any questions, comments, requests or concerns with regards to our handling of your personal information, or to request access or changes to your personal information please contact us via any of the following means:

Email: admin@interpharma.com.au

Phone: 02 9976 6876

Post: PO Box 115, Manly NSW 1655

Changes to this Privacy Policy

From time to time, we may change this Privacy Policy. Any changes to our Privacy Policy will be published on our website.

You may obtain a copy of our current Privacy Policy from our website at <https://interpharma.com.au/> or by contacting us via the contact details above.