

InterPharma

InterPharma Pty Ltd

ANSSER Privacy Policy

Last updated July 2023

We are bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**). This ANSSER Privacy Policy (**Policy**) explains if, when, how and why we collect, use, hold and disclose your personal information in relation to the Apomine Nurse Support Service (**ANSSER**) provided by our contractor, Ascott Sales Integration Pty Ltd (**Ascott**) on our behalf. It also explains how we manage de-identified information that we receive in relation to ANSSER.

"We", "us" and "our" means InterPharma Pty Ltd ABN 19 099 877 899 of Suite 103, Level 1, 39 East Esplanade, Manly 2095 NSW Australia.

"You" and "your" means you, if you are a person who has consented to the collection, use and disclosure of your personal information (including health information) by signing a Privacy Information Notice and Consent Form (**Privacy and Consent Form**) that is provided to you by Ascott on our behalf.

What is personal information?

Personal information is information or an opinion about an identified individual or about an individual who is reasonably identifiable from the information or opinion. The information or an opinion may be personal information regardless of whether it is true and whether the information or opinion is recorded in a material form or not. De-identified information is not personal information.

What personal information do we collect and hold in relation to your participation in ANSSER?

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

Personal information that you provide to Ascott in relation to ANSSER is required to be collected and used by Ascott, in accordance with the Privacy and Consent Form and Ascott's Privacy Policy at <https://www.iqvia.com/about-us/privacy/privacy-policy> and is not to be shared by Ascott with us. In engaging Ascott to coordinate and administer ANSSER, we have entered into an agreement that requires Ascott to comply with privacy and confidentiality obligations that apply to your personal information.

The only information we collect about you from Ascott with respect to your participation in ANSSER is limited to the following de-identified information (i.e not personal information):

- the type of Apomine therapy you are receiving (for example, via pump or intermittent injection) (**therapy**); and
- whether you have discontinued receiving the therapy, and if so, why you have so discontinued.

As noted above, we do not collect your name or any other personal information about you from Ascott.

We may collect information about you from you or your healthcare provider, if you or they, on your behalf, send an email or letter to us, or make a call to our listed or advertised telephone number, about your participation in ANSSER or the therapy. The information we may collect in those circumstances depends only on the information you or your healthcare professional disclose to us, and if so disclosed to us, may include your name and contact details, details about your use of ANSSER or the therapy, details of your enquiries or complaints about ANSSER or the therapy, and your health information in relation to any adverse events or side effects resulting from ANSSER or the therapy. You are not obliged to provide any personal information to us and you may choose not to.

We may collect information about how you access, use and interact with the ANSSER website (www.ansser.com.au), including the location from which you have visited the website, the pages you have visited, the number of people signing up to the website and how many people have downloaded content from the website, and which content. The information we collect does not include personal information such as your IP address.

We use cookies on the ANSSER website. A cookie is a small text file that a website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to it. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on our website. You may refuse to use 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 the relevant 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?

As noted above, the personal information you provide to Ascott nurses or clinicians with respect to the therapy or ANSSER is not disclosed by Ascott to us. However, we will collect de-identified information about you from Ascott as set out above.

Any personal information that we collect about you will be collected from you or your healthcare professional when you contact us, or they contact us on your behalf, including by phone, email or mail. This will be limited to the personal information disclosed to us during such communications. Our phone numbers and email addresses that you use to contact us may be operated by third party contractors who we engage to assist us with

the receipt of information that you or your healthcare provider may elect to provide to us in connection with your experience with ANSSER or the therapy. Any personal information that you or your healthcare professional disclose to such contractors will be collected, held, used and disclosed by the contractors, to report to the Therapeutic Goods Administration, where such disclosure is required by applicable law, and will not be disclosed by the contractor to us.

Where we engage any contractor for any purpose connected with ANSSER, we will do so via an agreement which requires them to comply with privacy and confidentiality obligations that apply to your personal information which they collect.

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

We collect, hold and use your personal information that you or your healthcare professional disclose to us (but not to any of our contractors), so that we can:

- (a) respond to your queries or complaints about ANSSER or the therapy, or undertake another action in relation to your query or complaint, or notify you of important matters we may be required by law to notify you of (e.g. product recalls) in connection with ANSSER or the therapy;
- (b) improve ANSSER or the therapy; and
- (c) comply with our legal obligations and assist government and law enforcement agencies or regulators in connection with ANSSER or the therapy.

We collect, hold and use de-identifiable information about persons accessing ANSSER to:

- (a) improve ANSSER or the therapy;
- (b) respond to queries or complaints about ANSSER or the therapy (to the extent that is possible with de-identified information); and
- (c) comply with our legal obligations and assist government and law enforcement agencies or regulators.

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

We do not generally disclose your personal information to other entities. We may disclose de-identified information about you that we hold to our parent company, EVER Pharma of Oberburgau 3 4866 Unterach, Austria including the number of patients who have started or discontinued therapy during a particular time period, and reasons given for such discontinuation of the therapy.

We may also disclose your personal information that you provide directly to us (but not to our contractors) 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 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.

Do we disclose personal information to overseas recipients?

We do not disclose your personal information to recipients which are located outside Australia.

We also do not disclose the de-identified information referred to above in this Policy 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 software called Salesforce. Our Salesforce account is managed by our parent company, EVER Pharma. The data in that Salesforce account is hosted in Europe. The personal information collected by Ascott in its coordination and administration of ANSSER is also hosted in the same Salesforce account operated by EVER Pharma. However, EVER Pharma has implemented processes and security measures to restrict and quarantine access to your personal information and the de-identified information referred to in this Policy, so that:

- (a) only Ascott is able to access your personal information stored in Salesforce that Ascott collects from you as part of ANSSER;
- (b) we are the only entity that can access personal information about you that you disclose to us directly, as referred to above in this Policy; and
- (c) we and Ascott are only able to access de-identified information about patients referred to above in this Policy.

Other 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 employees to comply with internal information security policies and keep information secure;
- (b) requiring all employees to complete training about information security; and
- (c) monitoring and regularly reviewing our business against our own policies and against industry best practice.

We will also 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 APPs.

Do we use your personal information for marketing?

We do not use your personal information to offer you products and services via any marketing communications.

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. Our contact details are set out below. 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).

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 unsatisfied 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 Policy

From time to time, we may change our Policy on how we handle personal information or the types of personal information which we hold. Any changes to our Policy will be published on our website.

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