

Privacy Policy

1. Purpose of our policy

CHECKITHEALTH PTY LTD ACN 637 505 689 (“**CHECKiT HEALTH**”, “**we**”, “**us**” or “**our**”) have implemented this Privacy Policy to provide users of our website, application, tools and services (“**Platform**”) with information about how we collect, hold, use and disclose your personal information (including sensitive information) (as those terms are defined in the *Privacy Act 1988 (Cth)* (“**Act**”).

We are committed to respecting your privacy and only collect, hold, use or disclose personal information (including any sensitive information) in accordance with the Act and this Privacy Policy.

By using the Platform or providing your personal information (including sensitive information) to us, you are taken to have read, and consent to the collection, handling, use and disclosure of your personal information (including sensitive information)-in accordance with this Privacy Policy. Your use of the Platform is also subject to our [Terms of Use](#).

You acknowledge that the personal information (including sensitive information)-you provide to us and which we collect from you, is your own information or information which you have been authorised to provide to us.

This policy may be updated at any time without notice to you and we encourage you to check the policy regularly for any changes.

2. Collection

Personal information

We collect your personal information (including sensitive information) to allow us to provide our services and conduct our business, in order for you to:

- use the Platform;

- receive information pertaining to and generated from your use of the Platform such as (and not limited to) a schedule of recommended health checks based on the information you provide and Australian guidelines, general health information, promotions and educational materials;
- contact or correspond with us, provide feedback or lodge and enquiry with us, to transact with us, third parties or other service providers or booking platforms in the course of our business; and
- request information about us, our products or our services or third party products or services;
- We may collect these types of information directly from you or third parties.
- We may also collect personal information from third parties (such as governmental, law enforcement and other public authorities and commercial information suppliers) and other publicly available information about you;
- If we engage with you multiple times over a short period in relation to the same matter we may not provide you with a separate notice about privacy each time we engage with you.

We may collect personal information such as

- your contact details such as your name, postal and email address and telephone number;
- Your date of birth or age; and
- Gender or sex.

We may collect sensitive information such as

- race or ethnicity;
- your health risks, lifestyle risk factors, medical or family history, diagnoses and your use of health services;
- dates of health appointments you provide to us and we provide to you based on the information you enter into the Platform; and
- any such other information that is within the scope of 'health information' as the term is defined in the Privacy Act.

However, no sensitive information entered directly into the Platform by you (and used to provide outputs or results from our application e.g. the schedule of recommended health

checks) is stored or used for any other purpose. That information is immediately deleted from the browser at the end of the user session.

We collect non personal information by us and/or our third party providers who may assist us in operating the Platform.

This may include recording your user experience and behavioural data related to your activities on the Platform such as:

- tracking technologies such as Google Analytics & Firebase;
- clickstream data, cookies, web beacons;
- third party content providers such as social media platforms and links such as Facebook, Instagram, Twitter, LinkedIn and other such social media platforms.

Google Analytics & Firebase

Our Platform uses Google Analytics & Firebase to anonymously track and measure how users interact with it. It does this by using cookies and JavaScript code to collect clickstream data such as visits to the site, where users originated from, what they did on the Platform and transactions with the Platform. This can include questionnaire selections, booking selections, communications made with service providers in relation to your use of the Platform such as an appointment or request for information.

We do not and will not match any data collected by Google Analytics or Firebase to personal information.

To find out more about how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or <https://policies.google.com/privacy> or any other URL Google may use from time to time.

Cookies, Web beacons

Cookies are text files placed in your computer's browser to store your preferences. Your cookie preferences can be configured by you, on your browser.

They can be used to collect information about the number of visits, the pages you visit, device and software you are using. Cookies by themselves do not tell us your email address or provide other personally identifiable information. They do allow third parties such as Google

and Facebook, to cause our advertisements to appear on your social media and online feeds as part of our retargeting campaigns.

We collect personal and non-personal information for us to understand demands, needs and trends in health checks and health services in order for us to:

- generate an appropriate health check schedule as a result of your responses to questions within the Platform and Australian guidelines;
- to evaluate and improve our Platform, services and business performance; and
- to respond to user needs appropriately.

3. Purposes

We use the personal information (including any sensitive information) we collect about you to use the Platform and for us to generate and provide the output and results from our Platform to you. Other non-sensitive information is used to generally conduct our business.

- Other purposes for which we collect your personal information may include:
- communicating with you and providing you with information, products or services you have requested and responding to your enquiries;
- advising you of updates to our Terms or Privacy Policy and about changes to the Platform, products or services including updates, upgrades and new versions;
- enforcing this Privacy Policy and our Terms of Use;
- researching needs of users to help us improve and personalising and customising your experience on the platform;
- promoting and marketing our products and services to you or providing you with information about products or services that we believe may be of interest to you from us, our partners and selected third parties;
- for analytics, market research and to develop our business, including to operate and improve our Platform and Services, and the products or services of third parties;
- managing our accounting and administrative purposes;
- sharing your personal information with our related entities, partners and selected third parties so that they can provide you with products or services on our behalf or help us to provide you with the requested products or services including contacting you in relation to the products or services; and combining your personal information with information we have collected from our related entities, partners, service

providers, third parties and cookies or web beacons to improve the quality of our products or services and the products or services of third parties. For example, we may combine behavioural data we have collected about you through cookies or web beacons and combine it with your personal information from requests you send to third parties through the Platform;

- if you are an employee or other representative of a customer to which we provide our products and services or a provider of services to us, communicating with you about your or your employer's engagement with us and otherwise as specified in this Privacy Policy;
- providing a better or more relevant product or service to you, for example by automatically populating forms on the Platform (included above);
- Processing any job application submitted by you.

4. Your rights and controlling your personal information

Choice and consent

If we contact you by using your personal information, we will give you the opportunity to request that your information not be used for direct marketing in the future by following the opt out instructions provided in the communication.

Whereas we use or disclose your personal information for the purpose for which it was collected, we may also use and disclose your personal information for a secondary purpose that is related to the purpose for which it was collected, where you would reasonably expect us to use or disclose your personal information for that secondary purpose.

We do not otherwise collect, use or disclose your personal information without your permission, unless the collection, use or disclosure is required or permitted by law, in accordance with this Privacy Policy, our Terms or any other agreement you enter into with us.

If you choose not to provide your personal information to us for the purposes set out in this Privacy Policy, we may not be able to provide you with requested information, products or services (or use parts of the Platform) to the extent that they require us to collect, use or disclose personal information.

5. Disclosure of information to third parties

We do not store or disclose your sensitive information to any third parties. We may disclose, or provide access to, your other personal information to:

- third parties in connection with the purposes described in this Privacy Policy.
- our related entities, our partners and third parties that provide products and services to us or through us, or to other third parties e.g. we disclose your personal information to the Platform hosting, back-up and other software and service providers; marketing or advertising providers and payment systems operators;
- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any parts of them) are or may (in good faith) be, transferred;
- 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;
- third parties, including agents or subcontractors, who assist us in providing information, products, services or direct marketing to you (this may include parties located, or that store data, outside of Australia); and
- third parties to collect and process data, such as Google Analytics & Firebase or other relevant businesses (this may include parties located, or that store data, outside of Australia).

Although we don't disclose your sensitive information, by providing us with non-sensitive personal information, you consent to the disclosure of that information to third parties who reside outside Australia and acknowledge that we are not required to ensure that those third parties comply with Australian privacy laws.

We may disclose your non-sensitive personal information to service providers outside of Australia to obtain hosting, secure storage, back-up and data retrieval services and to provide services. When you provide us with your personal information (other than sensitive information) you give us your consent to transfer that information and data outside of Australia for these purposes.

We may disclose, use, aggregate, make anonymous, use a pseudonym or de-identify information about users for marketing, advertising, research, compliance or other purposes.

Some of the third parties to whom we disclose your non-sensitive personal information may be located outside Australia. Although the countries in which these third parties are located depends on the circumstances, we commonly disclose that information to third parties, or IT systems, located in the United States. Where such third parties are located overseas, you may have rights to enforce such parties' compliance with applicable privacy laws, but you may not have recourse against those parties under the Act in relation to how those parties treat your personal information.

If you make an enquiry or request information from any company through the Platform, you will need to check their privacy policy to find out how they handle your personal information. We are not responsible for the way these companies collect, use, disclose or handle personal information you provide to them through the Platform.

We may also disclose and transfer personal data in connection with a merger or sale or as part of a corporate reorganisation or share sale or other change in corporate control.

Access

You are entitled to access, correct or update personal information we hold about you. If you wish to access, correct or update any personal information we hold about you, please contact us using the details below. An administrative fee may be payable for the provision of such information. In certain circumstances we may refuse access to the extent that the law allows us to do so.

Unsubscribe

If we contact you, we will give you the opportunity to request that your information not be used for further direct marketing in the future. You can unsubscribe at any time. Please also contact us at our details below at any time you decide you want to opt out of receiving any direct marketing.

6. Links to other websites

The Platform may contain links to sites operated by third parties. Those sites are not controlled by us and we are not responsible for their content. Those sites have their own terms and policies, including security and privacy policies. We encourage You to review those materials before using those sites.

7. Storage and security

We are committed to taking all reasonable steps that personal information we collect is secure. In order to prevent misuse, interference, loss and unauthorised access, modification and disclosure of information, any personal information that is collected via the Platform or which is stored on our IT systems is protected by a range of safeguards and security measures including physical, technical and procedural methods and to protect it.

For example, we also have an active and verified SSL certificate and encrypt communications using SSL/TLS.

We keep your personal information for only as long as it is required in order to fulfil the purposes for which it was collected and as described in this Privacy Policy and to comply with our legal obligations.

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 unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

8. Amendments

We may, from time to time, review and update this Privacy Policy. Any changes to this Privacy Policy will be published on the Platform. All personal information held by us will be governed by our most recent Privacy Policy. By continuing to use the Platform, or otherwise continuing to deal with us, you accept this Privacy Policy as it is updated from time to time.

9. Questions or complaints

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Act, or if you would like to access, correct or update your personal information held by us or want to opt out of direct marketing please contact us at our contact details below.

We will investigate your query or complaint and endeavour to respond to you promptly. Please provide as much detail as possible in relation to the query, issue or complaint.

If you don't think your privacy concerns have been resolved satisfactorily by us, or you wish to obtain more information on privacy requirements, you can contact the Office of the Australian Information Commissioner on 1300 363 992 or visit their website at www.oaic.gov.au.

For any questions please contact us at:

CHECKiT HEALTH Pty Ltd

Email: hello@checkithealth.com.au

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