

PRIVACY POLICY
POLICY

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1 TOPICS

1.1 OVERVIEW

Akesa Pharma Pty Ltd as (“Akesa” or “we”) and all its employees must comply at all times with their obligations under the Privacy Act 1988 (Cth) as amended from time to time and including by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* and *Privacy Amendment (Notifiable Data Breaches) Act 2017*.

This policy sets out Akesa’s commitment to the responsible collection and handling of personal information.

“Notifiable Data Breach” means a data breach of personal information that is likely to result in serious harm.

“Personal information” means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is either identified or reasonably identifiable.

“Sensitive information” means:

- information or an opinion about an individual's:
- racial or ethnic origin; or
- political opinions; or
- membership of a political association; or
- religious beliefs or affiliations; or
- philosophical beliefs; or
- membership of a professional or trade association; or
- membership of a trade union; or
- sexual orientation or practices; or
- criminal record;

That is also personal information; or

- health information about an individual; or
- genetic information about an individual that is not otherwise health information; or
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- biometric templates.

We strongly support the protection of all personal information. We only collect sensitive information where it is reasonably necessary for our functions or activities and either the individual has consented, or we are required or authorised by or under law (including applicable privacy legislation) to do so. For example, we may ask for police checks and collect health information about potential job candidates and our employees.

Akesa is required to comply with the Australian Privacy Principles (**APPs**) set out in the Privacy Act when it collects and handles personal information. Akesa will also comply with other privacy legislation such as relevant State and Territory health privacy legislation.

This policy applies only to the collection and handling of personal information by Akesa. We are generally exempt from the *Privacy Act* when we collect and handle employee records therefore, this Privacy Policy does not apply to that information. This also means that we do not have to grant employees access to their records. However, where State or Territory health privacy legislation applies, Akesa is required to protect the privacy of employee health information. This Privacy Policy will apply in those circumstances.

More information about the Privacy Act is available on the Office of the Australian Information Commissioner's web site at <http://www.oaic.gov.au> or on the OAIC's enquiry line at 1300 363 992.

1.2 TYPE OF PERSONAL INFORMATION COLLECTED BY AKESA

The type of personal information that we collect about you depends on the type of dealings you have with us. For example, if you:

- apply for a job with Akesa, we will collect the information you include in your job application, including your cover letter, resume, contact details and referee details;
- make a complaint (or are the subject of a complaint) under Akesa's Complaints Policy, we will collect your name and contact details and information about the substance, progress and outcome of the complaint;
- send us an enquiry or provide us with feedback, we may collect your name, contact details, details of your enquiry or feedback and information about our response.

1.3 HOW AKESA COLLECTS PERSONAL INFORMATION

We collect personal information in a number of ways, including:

- through written communications (including letter, fax and email).
- on hard copy forms;
- over the telephone; and
- in person

1.4 PURPOSES OF COLLECTION

The personal information held by Akesa is collected and held for the purpose of meeting our business objectives and to improve production and service delivery to customers.

In relation to personal information of job applicants, employees and contractors, our purpose of collection is to assess and (if successful) to engage the job applicant, employee or contractor.

We collect your personal information so that we can carry out the following:

- If you are a candidate for employment, to assess your suitability for a position;
- If you are a contractor, to assess your suitability to perform services;
- If you are client or customer:
 - To provide you with products and services that you have requested from us;
 - To communicate with you, including about products and services;
 - To answer your questions and provide you with information or advice;
 - To create orders, transaction records, agreements for the sale of products or services, accounts, tax invoices or receipts;
 - Provide your personal information to third parties that assist us in providing products and services you have requested;

if you are a supplier, consultant or business advisor:

- To communicate with you, including about products and services;
- To answer your questions and provide you with information or advice;
- To create orders, transaction records, agreements for the sale of products or services, accounts, tax invoices or receipts;
- Provide your personal information to third parties that assist us in providing products and services;

- To comply with laws or regulations or to comply with any directions given by regulators or authorities

We limit the collection of personal information to that which is reasonably necessary for one or more of the above.

Our websites utilise performance cookies in conjunction with Google Analytics for anonymous reporting. Their sole purpose is to improve website functions and the information is all aggregated and therefore, anonymous. Website users are prompted for consent prior to continuing or viewing the website.

Our websites may feature links to other websites not owned or controlled by us. We are not responsible for the content and privacy practices of other such websites.

1.5 USE AND DISCLOSURE OF PERSONAL INFORMATION

We only use and disclose personal information for the purposes outlined above. As most information is collected directly from the relevant individual, that individual will normally be aware of the purpose of the collection.

We may also use or disclose personal information for other purposes explained at the time of collection or where:

- that individual has consented; or
- we are required or authorised by law.

We may share personal information with third parties where appropriate for the purposes set out above, including:

- financial institutions for payment processing;
- referees whose details are provided to us by job applicants; and
- our contracted service providers, including:
 - information technology and data storage providers;
 - function and event organisers
 - marketing and communications agencies
 - research and statistical analysis providers
 - external business advisors (such as recruitment advisors, auditors and lawyers)

1.6 CROSS BORDER DISCLOSURE OF PERSONAL INFORMATION

We do not disclose personal information of job applicants and details of their application, to third parties located overseas. If we did, we will comply with the requirements of the Privacy Act and other applicable legislation that applies to cross border disclosures of personal information.

1.7 HOLDING & PROTECTION OF PERSONAL INFORMATION

We hold personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists and in paper files held in drawers and cabinets. Paper files may also be archived in boxes and stored offsite in secure facilities.

We endeavour to maintain the security and integrity of all facilities in which personal information is stored. This extends to protecting personal information from misuse, interference and loss, as well as from unauthorised access, modification and disclosure.

The steps Akesa takes to secure the personal information it holds include website protection measures (such as firewalls and anti-virus software), security restrictions on access to computer systems (such as login and

password protection), controlled access to our corporate premises, secure document storage, personnel security (including restricting access to personal information on our systems to staff who specifically require that access to carry out their work responsibilities), staff training and workplace policies.

All personal information will only be retained for a reasonable period of time.

If a Notifiable Data Breach occurs we will carry out in a reasonable and expeditious manner and, in any event in no more than 30 days, an assessment as to whether there are reasonable grounds to believe the circumstances amount to an “eligible data breach” of personal information which would lead to serious harm.

We will take steps to contain or reduce the suspected or known breach where possible.

In the event there is an eligible data breach then we will notify you of this and lodge a Notification Statement with the Australian Information Commissioner. The notification that we will provide to you and the Australian Information Commissioner will advise you of our details, a description of the data breach, the kinds of information concerned and what recommendations we think you should take in response to the breach.

1.8 ACCESS AND CORRECTION OF PERSONAL INFORMATION

We are committed to processing personal information promptly and accurately. As part of this commitment, individuals may request access to the personal information we hold about them and request correction of that information.

Requests for access or correction should be directed to Akesa’s General Manager. We reserve the right to refuse a request if it is vexatious or frivolous, or if we are legally entitled to do so.

1.9 PRIVACY COMPLAINTS

If you have a complaint about how we collected or handled your personal information, please contact Akesa’s General Manager. We will endeavour in the first instance to deal with your complaint and take action to resolve the matter.

If your complaint cannot be resolved at the first instance, we will ask you to lodge a formal complaint in writing, explaining the circumstances of the matter that you are complaining about, how you believe your privacy has been interfered with and how you believe your complaint should be resolved.

We will acknowledge receipt of your formal complaint and indicate the timeframe that you can expect a response. We will endeavour to resolve the complaint as quickly as possible, but if the matter is complex and our investigation may take longer, we will let you know when we expect to provide our response.

If you are unhappy with Akesa’s response, you may refer your complaint to the Office of the Australian Information Commissioner or, in some instances, other regulatory bodies, such as the Victorian Health Services Commissioner or the Australian Communications and Media Authority.

1.10 REVIEW OF POLICY

We reserve the right to revise this policy at any time. The current version will be posted on the Akesa website and a copy may be obtained by contacting Akesa’s Quality Manager. People who volunteer their personal details to Akesa are deemed to acknowledge and be bound by this policy and any changes made to it. This in no way affects the protection afforded under the relevant laws, according to which this policy was developed.

2 REVISION HISTORY

Version	Description of Change
1.0	New Policy