




Privacy Policy	
Document No: 1.8 Version 2.0 May 2016	Effective Date: 02/MAY/2016
Supersedes: Version 1.2 1404	Revision Due: 24 months

PRIVACY POLICY

Prepared By: Nicole Lawrence	 _____	01/APR/2016
Checked By: Natalie Fraser	 _____	01/APR/2016
Approved By: Andrew Scott	 _____	01/APR/2016

Reason for Revision/Issuance:

- New Two Year Update Regulatory Requirement
 Cancellation Other: inclusion of notification that information may be disclosed to 3rd parties or pharmaceutical companies and advice that it is the individual's responsibility to check individual company privacy policies regarding how they intend to manage personal information

Distribution:

All Ascott employees

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1. Outline

- 1.1. This Privacy Policy, which is subject to the Privacy Act and APPs to which we are bound, regulates how we collect, use and disclose personal information. As a health service provider, we also recognise the sensitive nature of health information and take additional steps to protect such information.
- 1.2. We may change, vary or modify all or part of this Privacy Policy at any time in our sole discretion.
- 1.3. If we adopt a new Privacy Policy:
 - 1.3.1. We will post the new Privacy Policy on the Platform; and
 - 1.3.2. It will then apply through your acceptance of it by subsequent or continued use of the Platform and/or our Services.
- 1.4. It is your responsibility to check this Privacy Policy periodically for changes.
- 1.5. This Privacy Policy does not apply to our acts and practices which relate directly to the employee records of our current and former employees.

2. Scope

- 2.1. We collect your personal information to lawfully carry out our functions and activities and provide our Services, including Nursing, sales and marketing programs which involves recruitment of staff and patients. The purpose of any data collection is to fulfil the individual program requirements as accepted by the relevant participant's personal information (Primary Purpose).
- 2.2. In addition to the Primary Purpose, we may use the personal information we collect and you consent to us using your personal information to:
 - 2.2.1. Provide you with further information about the Services you requested;
 - 2.2.2. Personalise and customise your experiences with us;
 - 2.2.3. Help us review, manage and enhance our Services;
 - 2.2.4. Develop insights used in reports or other content developed by us;
 - 2.2.5. When considering making offers to job applicants and prospective employees or for employment purposes
 - 2.2.6. Provide you with news about any services;
 - 2.2.7. Communicate with you, including by email, telephone and mail;
 - 2.2.8. Conduct surveys or promotions;
 - 2.2.9. Investigate any complaints about or made by you, or if we have reason to suspect you have breached any relevant terms; or
 - 2.2.10. As required or permitted by any law.

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- 2.3. We will destroy or de-identify your personal information if the purpose for which we collected the personal information from you no longer exists or applies.
- 2.4. Ascott staff are also required to follow all relevant Client Privacy Policies and report any breaches to relevant clients using the clients Privacy Policy process.
- 2.5. Where a client has their own Privacy Policy the Ascott Privacy Policy is to read in conjunction with the clients policy. Where there is a conflict the client policy overrides the Ascott Privacy Policy.

3. What we collect

3.1. Personal information we collect about you may include:

- 3.1.1. Your name, date of birth, address, telephone number, gender, email address, location, employment data, bank account details and other related financial information;
- 3.1.2. Next of kin, tax file number, education details, ABN/ACN;
- 3.1.3. Bank details, business references, financial details,, details about your business, drivers licence number and preferred means of contact; and
- 3.1.4. Professional credentials, hobbies and interests.

3.2. We may collect the following personal information (some of which may also be sensitive information) about you:

- 3.2.1. Information about your participation in clinical trials or support programs, including medical history, current and previous medication use, details of treating doctors, date of birth, Medicare number, occupation and interests;
- 3.2.2. Information about health care professionals (such as doctors and nurses) who prescribe, sell or educate regarding particular products and services, including name, position, business contact details, areas of professional expertise and speciality, records of previous dealings with you and details of your practice, pharmacy or clinic;
- 3.2.3. information in circumstances where a complaint is made and we must respond or report to relevant regulatory bodies;
- 3.2.4. information of current and prospective customers and/or suppliers in the course of conducting our business;
- 3.2.5. information of persons consenting to receive marketing and other promotional material on their or their employer's behalf, which include the person's name and contact information;
- 3.2.6. information collected from health care professionals and suppliers in relation to conducting clinical trials;
- 3.2.7. information and opinions from referees of prospective employees; and
- 3.2.8. information about our customers or their officers or employees collected in the general course of conducting our business
- 3.2.9. As a health service provider we collect, hold and use health information. We will only collect, hold, use or disclose health information, which is sensitive information, with your consent.

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4. How we collect

4.1. Your personal information may be collected:

- 4.1.1. when you complete an application, consent or similar form in paper, via our Platform or otherwise;
- 4.1.2. when you participating in one of our Services;
- 4.1.3. when you contact us; or
- 4.1.4. from our customers, including doctors, pharmacists, nurses and product suppliers or your family members as part of a treatment process;
- 4.1.5. from publicly available sources of information;
- 4.1.6. from government regulators, law enforcement agencies and other government entities
- 4.1.7. from business contacts, external service providers and suppliers;
- 4.1.8. from prospective employees; and
- 4.1.9. by other means as we will reasonably inform you of (as relevant).

4.2. If we collect any personal information about you from someone other than you, to the extent not already set out in this Privacy Policy, we will inform you of the fact that we will collect, or have collected, such information and the circumstances of that collection before, at or as soon as reasonably practicable after we collect such personal information.

4.3. If we receive unsolicited personal information about you that we could not have collected in accordance with this Privacy Policy and the Privacy Act, we will, within a reasonable period, destroy or de-identify such information received.

4.4. You are not obliged to give us your personal information. If you would like to access any of our Services on an anonymous basis we will take reasonable steps to comply with your request. However, we will require you to identify yourself if:

- 4.4.1. we are required by law to deal with individuals who have identified themselves; or
- 4.4.2. it is impracticable for us to deal with you if you do not identify yourself or elect to use a pseudonym

5. Use

5.1. We will only use and disclose your personal information:

- 5.1.1. for purposes which are related to the Primary Purpose; or
- 5.1.2. if we otherwise get your consent to do so, in accordance with this Privacy Policy and the Privacy Act.

5.2. We will not use your personal information for any purpose for which you would not reasonably expect us to use your personal information. Additionally, we will not disclose your sensitive information without your consent, unless there is a need to

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disclose such information in accordance with the Privacy Act or to comply with any other regulatory requirement.

5.3. We will only use or disclose your personal information for the purposes of direct marketing if:

- 5.3.1. we collected the information from you;
- 5.3.2. it is reasonable in the circumstances to expect that we would use or disclose the information for direct marketing purposes;
- 5.3.3. we provide you with a simple means to 'optout' of direct marketing communications from us; and
- 5.3.4. you have not elected to 'opt-out' from receiving such direct marketing communications from us.

5.4. You may opt out of receiving such communications by:

- 5.4.1. clicking a link on the email communications sent to you;
- 5.4.2. contacting our privacy officer by telephone on +61 2 9439 9770 or at team@ascottsales.com.au or
- 5.4.3. writing to us at PO Box 910 Crows Nest NSW 1585 Australia

6. Disclosure

6.1. We may disclose personal information and you consent to us disclosing such personal information to:

- 6.1.1. third parties engaged by us to perform functions or provide products or Services on our behalf;
- 6.1.2. doctors and health care professionals, who are involved, assist or requested us to deliver our Services to you;
- 6.1.3. your referees and former employers;
- 6.1.4. our professional advisors, including our accountants, auditors and lawyers;
- 6.1.5. our related bodies corporate;
- 6.1.6. persons authorised by you to receive information held by us; and
- 6.1.7. any persons as required or permitted by any law.

6.2. We may disclose your personal information (which may include sensitive information) to our pharmaceutical company clients on behalf of whom or in conjunction with, we may be providing you the Services. Some of these recipients may be (or have servers which are) located outside Australia. We will ensure we obtain your consent before we disclose your personal information to such parties. You should contact the relevant pharmaceutical company to view their privacy policy regarding how they intend to manage your personal information, find out which countries they are located in and where they would intend to store your personal information.

6.3. We may otherwise in some circumstances send your personal information to other overseas recipients, for example due to our database servers being located outside

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Australia. The countries in which likely overseas recipients of personal information are located includes: USA, Europe, UK, Israel, Asia.

- 6.4. If we send personal information to overseas recipients, we will take reasonable measures to protect your personal information such as ensuring all information is de-identified where appropriate before being transmitted. However, you acknowledge and agree that if we disclose your personal information to overseas recipients, we are not obliged to take reasonable steps to ensure overseas recipients of your personal information comply with the Privacy Act and the APPs.

7. Access + Correction

- 7.1. Access. You have a right to access your personal information, subject to certain exceptions provided for in the Privacy Act.
- 7.2. If you require access to your personal information, please contact us using our contact details below.
- 7.3. You are required to put your request in writing and provide proof of identity.
- 7.4. We are not obliged to allow access to your personal information if:
- 7.4.1. We reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
 - 7.4.2. giving access would have an unreasonable impact on the privacy of other individuals;
 - 7.4.3. the request for access is frivolous or vexatious;
 - 7.4.4. the information relates to existing or anticipated legal proceedings between you and us and would not ordinarily be accessible by the discovery process in such proceedings;
 - 7.4.5. giving access would reveal our intentions in relation to negotiations with you in a way that would prejudice those negotiations;
 - 7.4.6. giving access would be unlawful;
 - 7.4.7. denying access is required or authorised by or under an Australian law or a court/tribunal order;
 - 7.4.8. we have reason to suspect that unlawful activity, or misconduct of a serious nature relating to our functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
 - 7.4.9. giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
 - 7.4.10. giving access would reveal internal evaluative information in connection with a commercially sensitive decision-making process.
- 7.5. If you make a request for access to personal information, we will:
- 7.5.1. respond to your request within a reasonable period; and

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7.5.2. if reasonable and practicable, give access to the information in the manner requested.

7.6. If we refuse to give access to the personal information because of an exception or in the manner requested by you, we will give you a written notice that sets out at a minimum:

- 7.6.1. our reasons for the refusal (to the extent it is reasonable to do so); and
- 7.6.2. the mechanisms available to complain about the refusal.

7.7. Correction. We request that you keep your personal information as current as possible. If you feel that information about you is not accurate or your details have or are about to change, you can:

- 7.7.1. contact us using our contact details below and we will correct or update your personal information; or

7.8. If you otherwise make a request for us to correct your personal information, we will:

- 7.8.1. respond to your request within a reasonable period; and
- 7.8.2. if reasonable and practicable, correct the information in the manner requested.

7.9. If we refuse a request to correct personal information, we will:

- 7.9.1. give you a written notice setting out the reasons for the refusal and how you may make a complaint; and
- 7.9.2. take reasonable steps to include a note with your personal information of the fact that we refused to correct it.

8. Security + Protection

8.1. In relation to all personal information, we will take all reasonable steps to:

- 8.1.1. ensure that the personal information we collect is accurate, up to date and complete;
- 8.1.2. ensure that the personal information we hold, use or disclose is, with regard to the relevant purpose, accurate, up to date, complete and relevant; and
- 8.1.3. protect personal information from misuse, loss or unauthorised access and disclosure.

8.2. We utilise various up to date security software platforms to ensure the protection of your personal information. We store your personal information on a secure server behind a firewall and use procedures designed to protect the personal information from unauthorized access, destruction, use, modification or disclosure.

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- 8.3. We make sure that whenever your personal information needs to be processed with the aid of actual human interaction, this interaction follows a clear logic of duty segmentation to avoid unnecessary exposure of your personal information within our organization.
- 8.4. All of our employees and agents with systemic privileges to view and process your personal information are under special nondisclosure obligations and will only access and process the personal information that is strictly necessary to fulfil the Primary Purpose.
- 8.5. You acknowledge that the security of communications sent by electronic means or by post cannot be guaranteed. We cannot accept responsibility for misuse, loss or unauthorised access to your personal information where the security of information is not within our control.
- 8.6. If you suspect any misuse or loss of your personal information please contact us immediately.

9. Complaints

- 9.1. If you have a complaint about how we collect, use, disclose, manage or protect your personal information, or consider that we have breached the Privacy Act or APPs, please contact us using our contact details below. We will respond to your complaint within 14 days of receiving the complaint.
- 9.2. Once the complaint has been received, we will try to resolve the matter in a number of ways:
- 9.2.1. Request for further information: We may request further information from you. You should be prepared to provide us with as much information as possible, including details of any relevant dates and documentation. This will enable us to investigate the complaint and determine an appropriate solution.
 - 9.2.2. Discuss options: We will discuss options for resolution with you and if you have suggestions about how the matter might be resolved you should raise these with our Privacy Officer.
 - 9.2.3. Investigation: Where necessary, the complaint will be investigated. We will try to do so within a reasonable time frame. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.
 - 9.2.4. Conduct of our employees: If your complaint involves the conduct of our employees we will raise the matter with the employees concerned and seek their comment and input in the resolution of the complaint.
- 9.3. After investigating the complaint, we will give you a written notice about our decision.

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9.4. You are free to lodge a complaint directly with the Office of the Australian Information Commissioner (OAIC) online, by mail, fax or email. For more information please visit the OAIC website at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

10. Contact

10.1. Please forward all correspondence in respect of this Privacy Policy to:

Privacy Officer
 Nicole Lawrence
 P: +61 2 94399770
 F: +61 2 9439 4550
 E: teams@ascottsales.com.au

11. Interpretation + Definitions

11.1. Personal pronouns: Except where the context otherwise provides or requires:

11.1.1. the terms we, us or our refers to Ascott Sales Integration Pty Ltd (ACN 094 015 255); and

11.1.2. the terms you or your refers to a user of the Platform and/or a customer to whom we provide the Services.

11.2. Terms italicised and defined in the Privacy Act have the meaning given to them in the Privacy Act.

11.3. Defined terms: In this Privacy Policy unless otherwise provided, the following terms shall have their meaning as specified:

APPs means any of the Australian Privacy Principles set out in Schedule 3 of the Privacy Act.

Platform means our website at www.ascottsales.com.au including its sub-domains.

Privacy Act means the Privacy Act 1988 (Cth) as amended from time to time.

Privacy Policy means this privacy policy as amended from time to time.

Services means our sales team integration and outsourcing healthcare sales services, including contract sales and nurse team provision that we conduct from time to time.

