

**PRIVACY POLICY**  
**POLICY ADOPTED NOVEMBER 2023**

## **PURPOSE**

ORSPEC Pharma Pty Ltd and its subsidiary companies ("we," "our," or "us") is committed to protecting your privacy and ensuring the security of your personal information. This Privacy Policy describes how we collect, use, store, protect and disclose personal information as required by the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth), the Privacy Regulations 2013 (Cth); Australian State and Territorial laws governing the use of personal information or health records and the general law intended to protect your privacy - as amended from time to time.

The APP's govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information. A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

ORSPEC Pharma will assume you consent to collection, use and disclosure of your personal information in the manner specified in this Privacy Policy (which may change from time to time) until you withdraw your consent by contacting us using our contact details below.

## **BACKGROUND**

ORSPEC Pharma provides pharmaceutical products and services to hospitals, pharmacies and the health market generally. In providing these products and services, we may collect, use and disclose personal information.

## **PERSONAL INFORMATION WE COLLECT**

Personal Information is information or an opinion that identifies an individual. This Personal Information is obtained in many ways including correspondence, telephone, facsimile, email, via our website [www.orspecpharma.com](http://www.orspecpharma.com), from your website, from media and publications, from other publicly available sources, from cookies and from third parties. We cannot guarantee website links or policy of authorised third parties.

ORSPEC Pharma will only ask for information where it is reasonably necessary for or directly related to the conduct of our business functions or activities. We will typically collect personal information in the course of providing our products and services to customers and in other dealings with those customers and prospective customers. We may also collect personal information as we determine necessary from time to time for any purpose in connection with the general conduct of our business, for example, in dealing with suppliers, service providers and contractors.

The types of information we may collect include, but are not limited to:

- Contact Information (e.g., name, email address, phone number);
- Any other information you provide voluntarily;
- Other personal information you give us when you request products or services from us. This information may include: your requirements with respect to specific products or services;

your opinion or preferences with respect to any of our products or services, payment details, or your preferred payment method;

- Information contained in any communications between you and us;
- Information contained in an application form or other document given to us;
- Payment and transactional information about your purchase and use of our products and services;
- Activity with our digital or online services; and
- Any information we are required to collect by law.

### **COLLECTION OF PERSONAL INFORMATION**

ORSPEC Pharma will only collect your personal information by lawful and fair means and not in an unreasonably intrusive way. We will usually only collect personal information from you or an authorised third party. Where you provide us with personal information about someone else you must have their consent to provide their personal information to us based on this Privacy Policy.

Some websites that have links on our website may collect personally identifiable information about you when you access or utilise those links. We do not control the collection or use of such information, and the practices of those websites are not covered by this Privacy Policy.

### **USE OF PERSONAL INFORMATION**

Generally, ORSPEC Pharma collects information for one or more of the following purposes:

- Accepting, processing, invoicing and delivering orders or providing credits;
- Being aware of any special products or service requirements you may have;
- Providing electronic confirmation of orders (where applicable) and advising of any changes to our products and services;
- Communicating and providing information about our products or services by telephone, electronic messages (e.g., email), our digital services and other means;
- Maintaining and updating our records;
- Working with our service providers;
- Conducting reviews or checks of credit worthiness;
- Maintaining a record of enquiries (including medical enquiries) and complaints relating to products we supply;
- As required by law, collecting, storing and processing reports of adverse events experienced by patients. Adverse event information may be transferred to an associated company of ORSPEC Pharma which may be located outside Australia for the purposes of processing and reporting the adverse event to the respective health authorities. We may also use that information to contact you in relation to your report or send you product or other information which we consider relevant;

- Notifying you of matters required or authorised by law (such as product recalls);
- Complying with relevant laws, regulations and Codes;
- Reporting obligations under Medicines Australia's then current Code of Conduct;
- Helping us analyse traffic patterns throughout our website;
- Using personal information for any other purpose that it was collected for or any related purpose for which we are entitled to use personal information;
- To protect our rights and interests.

Where we are not able to collect personal information that we require to conduct particular functions or activities, it may restrict or limit our ability to conduct or perform that function or activity.

#### **DISCLOSURE OF PERSONAL INFORMATION**

ORSPEC Pharma may disclose Personal Information to third parties as we determine necessary from time to time for any purpose reasonably necessary in the conduct of our business, including, but not limited to:

- Any service provider who assists us to provide you with a product or service which you have requested or which relate to those products or services;
- Legal Compliance in response to a legal request or to comply with applicable laws or regulatory practice;
- Required for the ordinary operation of our business (e.g., to send you information about our products and services);
- Business Transfers if we are involved in a merger, acquisition, or sale of assets.
- Expressly permitted under any agreement with you;
- Our related companies, business associates and others for purposes directly related to the purpose for which the personal information is collected;
- To lessen a serious threat to a person's health or safety; or
- Our parent company located in Ireland for the purpose of administration, safety monitoring of products and to enable us to provide a better service.

We do not sell, rent, or trade your personal information with others. Information provided by you may be stored in databases or other systems which are stored overseas including, but not limited to Australia, New Zealand and Singapore.

#### **SECURITY AND DATA RETENTION**

ORSPEC Pharma will take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure. Your information is stored securely whether in an electronic or physical form. For example, only staff needing access to the information are allowed

access. Your personal information is stored in secured premises or in electronic databases requiring logins and passwords.

Some information is kept for as long as necessary to comply with legal requirements. We will take reasonable steps to de-identified or destroyed any personal information that is no longer needed is.

Where ORSPEC Pharma needs to disclose personal information to a third-party service provider, we require that they comply with this Policy; the relevant Australian Acts and Regulations (as amended from time to time) and are subject to obligations to protect the privacy and security of your personal information and use it only for the specific purpose for which it is disclosed.

### **SENSITIVE INFORMATION**

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

We will not collect, use or disclose sensitive information about you unless it is necessary to provide you with products or services and we have your consent or unless we are legally required to collect, use or disclose that information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

### **UPDATES TO PRIVACY POLICY**

We may update this Privacy Policy from time to time. The amended Privacy Policy will be posted on our website so that you will always be aware of how we manage your personal information.

### **REVIEW, CHANGE AND CORRECTION OF PERSONAL INFORMATION**

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date. If you find that the information we have is incomplete, out-of-date or inaccurate, please advise us as soon as possible so we can update our records and ensure we can continue to provide a quality service to you.

**HOW TO CONTACT US**

If you wish to contact us, for example, to access, update or correct your personal information, you may contact us at:

ORSPEC Pharma Pty Ltd

21/21 Kangoo Road

Somersby

New South Wales

AUSTRALIA, 2250

**Ph:** 61 24 339 4239

**E-mail:** [customerservice@orspecpharma.com](mailto:customerservice@orspecpharma.com)