

MYGPMPTOOL Privacy Policy

1. Introduction

- (a) This website is created and controlled by GPMP Australia Pty Ltd (ACN 637 797 669) (**GPMP, we, us or our**).
- (b) We are committed to ensuring your personal information is protected. We manage your personal information in accordance with the Australian Privacy Principles set out in the *Privacy Act 1988 (Cth)* (**Privacy Act**).
- (c) By accessing and using our website available at www.MyGPMPTool.com.au (**Website**), the MYGPMPTOOL Platform and MYGPMPTOOL (MGT) APP (collectively, the **MYGPMPTOOL (MGT) Platform**) or any products or services on the Website, you agree to this Privacy Policy.
- (d) This Privacy Policy outlines how we collect, store, use and disclose your Personal Information, and how you may access your Personal Information (as defined in the Privacy Act) kept by us or how you may make a privacy complaint.

2. The information we collect about you

2.1. Patient information

- (a) We will only collect and hold Personal Information about you that is reasonably necessary to undertake our business activities and functions, deliver our products and services to you, or as otherwise permitted by law.
- (b) The type of Personal Information that we collect and use depends on the type of dealings that you have with us and includes the following:
 - (i) personal details, such as full name, address, mobile and telephone numbers, date of birth and email address;
 - (ii) Health Information and Sensitive Information (as defined under the Privacy Act), including information relating to your health or disability, medical records, medical care and clinical history (for example, medication taken, medical conditions, previous medical test results, pathology results, family medical history and medical investigations and treatments), your ethnic background and genetic information;
 - (iii) your Medicare number, Veterans' Affairs number, Health Care Card number, health fund details or pension number; and
 - (iv) contact details (see below) and details of the services provided to patients by medical health practitioners and allied health providers.

2.2. Health professionals

- (a) We collect and hold Personal Information about healthcare professionals, medical specialists, carers, allied health professionals who use the MYGPMPTOOL (MGT) Platform or otherwise supply goods and services to the

patient and other individuals to facilitate our business activities and carry out our services.

- (b) For example, the type of Personal Information that we collect includes:
- (i) name, address, email address and healthcare identifiers of health service providers, medical practices, medical specialists, carers and allied health professionals;
 - (ii) letters of referral or medical reports;
 - (iii) payment and billing information;
 - (iv) information relating to your dealings, or enquiries you have made, with us, including information about the products or services you have ordered;
 - (v) information regarding your access and use of our Website, including location information, IP address and any third party websites you access; and
 - (vi) other information that healthcare professionals, medical specialists, and allied health professionals provide to us or that we may collect in the course of your use and access of the MYGPMPTOOL (MGT) Platform.

2.3. Other information

- (a) We may also collect and use:
- (i) information relating to your dealings, or enquiries you have made, with us, including information about the products or services you have ordered;
 - (ii) information regarding your access and use of our Website, including location information, IP address and any third party websites you access; and
 - (iii) other information that you provide to us or that we may collect in the course of your use and access of the MYGPMPTOOL (MGT) Platform.
- (b) We may also collect some information that is not Personal Information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our Website, or the MYGPMPTOOL (MGT) Platform.
- (c) If you are a candidate seeking employment with GPMP, we will use your Personal Information to process your application and assess your suitability for any role. We may retain your information for future reference.

3. Collection

3.1. Collection from you

- (a) We collect your Personal Information in several ways, including:
 - (i) when you access and use the MYGPMPTOOL (MGT) Platform, through your use, or orders, of our products or services;
 - (ii) set up or update an account or other registration on the MYGPMPTOOL (MGT) Platform;
 - (iii) when you visit the Website or submit information through the Website (including on, or via, our related social media accounts), contact us, or complete any forms or documents for our products or services;
 - (iv) from third parties who access and use the MYGPMPTOOL (MGT) Platform, including your treating healthcare professionals, medical specialists and allied health professionals;
 - (v) when you interact or communicate with us, such as by telephone, email or in person; and
 - (vi) from publicly available sources of information.
- (b) When we collect Personal Information directly from you, we will take reasonable steps to notify you (using a collection notice) at, before, or as soon as practicable after, the time of collection.
- (c) As a collection notice is specific to a particular collection of Personal Information, it will provide more specific information about our information-handling practices than this policy.
- (d) This policy is subject to any specific provisions contained in our collection notices and the terms and conditions of any offers, products and services. We therefore encourage you to read those provisions carefully.
- (e) By providing your Personal Information to us, you acknowledge that you are authorised to provide such information to us.

3.2. Collection from healthcare professionals

- (a) We may collect Personal Information about you from:
 - (i) your treating healthcare professionals, medical specialists and other allied health professionals;
 - (ii) publicly available sources; and
 - (iii) third parties (including our related bodies corporate, business partners and service providers, credit reporting bodies, credit providers, government agencies and cloud-based accounting software platforms and healthcare management software platforms, such as the Topbar App),and we take reasonable steps to make sure you are aware of the collection.
- (b) If you provide us with Personal Information about a patient (as their authorised representative or their treating healthcare professionals, medical specialists or allied health professionals), we rely on you to:
 - (i) inform the patient that you are providing their Personal Information to us; and
 - (ii) advise them that they can contact us for further information.

- (c) You must take reasonable steps to ensure the patient is aware of, and consents to, the matters outlined in this policy, including that their Personal Information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to access that information, who we are, and how to contact us.
- (d) Upon our request, you must also assist us with any requests by a patient to access or update the Personal Information you have collected from them and provided to us.

3.3. Third party payment processor

We use a third party payment processor, GoCardless, to process payments made to us. In connection with the processing of such payments, we do not collect, process, use, share, store or disclose any Personal Information or payment information (such as credit card and bank account details). Rather, all such information is provided directly to our third party processor, Gocardless, whose use of your Personal Information is governed by their privacy policy, which may be viewed at www.gocardless.com/en-au.

3.4. Topbar App

If you access and use the MYGPMPTOOL (MGT) Platform through the Topbar App, we may collect, process, use, share, store and disclose Personal Information and Sensitive Information disclosed to us by Pen CS Pty Ltd. By using and continuing to use the MYGPMPTOOL (MGT) Platform through the Topbar App, you authorise Pen CS Pty Ltd to share and disclose your Personal Information and Sensitive Information to GPMP. The collection of your Personal Information and Sensitive Information by Pen CS Pty Ltd is governed by their privacy policy, which may be viewed at <https://www.pencs.com.au/privacy-policy>.

4. How we use your Personal Information

4.1. Purposes of use and disclosure

- (b) We only use, process and disclose your Personal Information for the purposes for which it is collected.
- (c) In particular, we use, process and disclose your Personal Information to:
 - (i) provide you with our products or services or the MYGPMPTOOL (MGT) Platform;
 - (ii) improve, develop and manage our products, services, Website, the MYGPMPTOOL (MGT) Platform, and to assist us in providing a better service to you;
 - (iii) operate, maintain, test and upgrade the Website, the MYGPMPTOOL (MGT) Platform and systems; and
 - (iv) advertise to patients who access, and use the GPLINKTOOL APP or otherwise notify patients of medical information, medical and non-medical goods and services provided by Authorised Third Parties and other third parties that may be of interests to such patients;
 - (v) advertise to customers and authorised users of the MYGPMPTOOL (MGT) Platform who access, and use, the MYGPMPTOOL (MGT) Platform or otherwise notify customers and authorised users of goods and services provided by Authorised Third Parties and other customers and authorised

users of the MYGPMPTOOL (MGT) Platform who have a premium account with us;

- (vi) notify you of opportunities or matters we think you might be interested in, including new product or service offerings, information about the MYGPMPTOOL (MGT) Platform, offers, competitions, promotions, events and surveys or recruitment or job opportunities;
 - (vii) to verify your identity;
 - (viii) to conduct fraud, risk reduction and creditworthiness checks;
 - (ix) to perform research and analysis about our products, services, the MYGPMPTOOL (MGT) Platform, including usage patterns, trends, benchmarking and other statistical or behavioural data. Before we use your Personal Information for this purpose, we ensure Personal Information is made anonymous by removing data that can identify you;
 - (x) to comply with regulatory or other legal requirements;
 - (xi) charge and bill you for the use of our products and services, or the MYGPMPTOOL (MGT) Platform;
 - (xii) for direct marketing purposes (see section 5 below); and
 - (xiii) for any purpose to which you have consented; and
 - (xiv) for any other purpose notified to you at the time of collection.
- (d) In the event of a merger, acquisition or sale of the whole or part of our business or assets, we reserve the right to transfer your Personal Information as part of the transaction, without your consent or notice to you.

4.2. Disclosure to Authorised Third Parties

- (a) With your consent, we may provide your Personal Information to the following recipients:
- (i) our employees, related entities, business partners, third party contractors, suppliers and agents from time to time for the purpose of delivering, providing and administering our promotions, deals, competitions, products, services and the MYGPMPTOOL (MGT) Platform;
 - (ii) treating healthcare professionals, medical specialists and other allied health professionals who are involved in your medical treatment;
 - (iii) third party providers of medical and non-medical goods and services for direct marketing purposes, except that any Personal Information or Sensitive Information will only be disclosed to such third party providers in anonymized form;
 - (iv) third party service providers who process or use your Personal Information for the purpose of performing functions on our behalf, but may not process or use such information for any other purpose. Examples of these third-party service providers include, but are not limited to, such as cloud-based accounting software platform, marketing and analysis organisations, financial and credit card institutions to process payments, hosting companies, web developers, internet service providers, customer service providers, customer support specialists, fulfilment companies and research and data analysis firms;

- (v) government agencies or regulatory bodies (ie. Centrelink and Medicare); or
- (vi) external business advisors, such as auditors, lawyers, insurers and financiers,

(collectively, **Authorised Third Parties**).

- (b) Prior to the disclosure of Personal Information to Authorised Third Parties, we will take such steps as reasonable in the circumstances to ensure that the Authorised Third Parties treat your Personal Information securely and otherwise complies with the relevant Australian Privacy Principles in relation to the Personal Information.
- (c) Our Authorised Third Parties may also provide us with Personal Information collected from you. If you disclose Personal Information to any Authorised Third Parties, we rely on you to provide the Authorised Third Parties with consent for us to collect, storage, use, process, alter and disclose your Personal Information.
- (d) We may also disclose any Personal Information we consider necessary to comply with any applicable law, regulation, legal process, governmental request or industry code or standard.

4.3. Overseas disclosure

- (a) In the course of providing you with to access to, and use of, the MYGPMPTOOL (MGT) Platform, our products or services, it may become necessary or desirable to disclose Personal Information to Authorised Third Party located overseas. The countries in which these overseas recipients may be located will depend upon the individual circumstances. However, in the course of our ordinary business operations we commonly disclose Personal Information to Authorised Third Party located in the following countries: [United Kingdom, European Union, United States and other countries.
- (b) The laws where these overseas recipients may be located provide various levels of protection for Personal Information which are not always equivalent to the level of protection that may be provided for in Australia. Where we transfer your Personal Information overseas we will take reasonable steps to ensure that your Personal Information is treated securely, and that the means of transfer provides adequate safeguards.

4.4. Disclaimer

- (a) We will not disclose your Personal Information to any third party (other than our Authorised Third Parties) without your written consent, unless:
 - (i) we are otherwise required by the relevant Privacy Laws;
 - (ii) we are permitted to under this policy; or
 - (iii) such disclosure is, in our opinion, reasonably necessary to protect our rights or property, avoid injury to any person or ensure the proper functioning of the MYGPMPTOOL (MGT) Platform.
- (b) This policy only covers the use and disclosure of information we collect from you. The use of your Personal Information by any third party is governed by their privacy policies and is not within our control.

5. Direct marketing

5.1. Your consent

- (a) Where we have obtained your prior consent or are otherwise permitted under the Privacy Act, we may, from time to time, use your Personal Information to send you information about:
 - (i) the MYGPMPTOOL (MGT) Platform, promotions, deals, competitions, products or services we offer;
 - (ii) medical and non-medical goods and services offered by Authorised Third Parties; and
 - (iii) any other information that we consider may be relevant to you.
- (b) These communications may continue, even after you stop using the MYGPMPTOOL (MGT) Platform or our products or services.

5.2. Communication channels

- (a) We may send this information to you via the communication channels specified at the time you provide your consent.
- (b) These communication channels may include mail, email, SMS telephone, social media or by customising online content and displaying advertising on our site.

5.3. Opting-out

You can opt out of receiving these communications by:

- (a) contacting us using the details below; or
- (b) using the unsubscribe function in the email or SMS.

6. Storage and security

6.1. Protecting your Personal Information

- (a) We protect your information using physical, technological and administrative security measures to minimise and manage the risks of unauthorised access, disclosure, use and alteration of your Personal Information. Some of the safeguards that we use include SSL (Secure Socket Layer) end to end encryption when transmitting payment information and Persona Information, multifactor authentication access controls, firewalls and we undertake regular security compliance audits and we are compliant with Australian Cyber Security Centre, Essential 8 principles.
- (b) Our officers, employees, agents and third-party contractors are expected to observe the confidentiality of your Personal Information.
- (c) Wherever possible, we procure that Authorised Third Parties who have access to your Personal Information take reasonable steps to:
 - (i) protect and maintain the security of your Personal Information; and
 - (ii) comply with the relevant Australian Privacy Principles when accessing and using your Personal Information.

6.2. No guarantee

- (a) The transmission of information via the internet is not completely secure. While we do our best to protect your Personal Information, we cannot guarantee the security of any Personal Information transmitted through the MYGPMPTOOL (MGT) Platform.

- (b) You provide your Personal Information to us at your own risk and we are not responsible for any unauthorised access to, and disclosure of, your Personal Information.

6.3. Destruction of Personal Information

We will destroy or de-identify Personal Information where it is no longer required, unless we are required or authorised by law to retain the information.

6.4. Notifiable Data Breaches Scheme

In the event of any loss, or unauthorised access or disclosure of your Personal Information that is likely to result in serious harm to you, we will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with notifiable data breach scheme contained in Part IIIC of the Privacy Act.

7. Accessing and correcting your Personal Information

- (a) We take steps reasonable in the circumstances to ensure Personal Information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your Personal Information that is collected and held by us.
- (b) If at any time you would like to access or correct the Personal Information we hold about you, or you would like more information about our approach to privacy, please contact us via the contact details set out in section 12 below. We will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct Personal Information where necessary and appropriate.
- (c) To obtain access to your Personal Information:
 - (i) you will have to provide proof of identity to ensure that Personal Information is provided only to the correct individuals and that the privacy of others is protected; and
 - (ii) we may charge you a reasonable administration fee, which reflects our costs in providing you with access to your Personal Information in accordance with your request.
- (d) If we refuse your request to access or correct your Personal Information, we will provide you with written reasons for the refusal and details of complaint mechanisms.

8. Cookies policy

- (a) We may collect information when you access and use the MYGPMPTOOL (MGT) Platform by utilising features and technologies of your internet browser, including cookies, pixel tags, web beacons, embedded web links and similar technologies. A cookie is a piece of data that enables us to track and target your preferences.
- (b) The type of information we collect may include statistical information, details of your operating system, location, your internet protocol (IP) address, the date and time of your visit, the pages you have accessed, the links which you have clicked and the type of browser that you were using.
- (c) We may use cookies and similar technologies to:

- (i) enable us to identify you as a return user and personalise and enhance your experience and use of the MYGPMPTOOL (MGT) Platform; and
 - (ii) help us improve our service to you when you access the MYGPMPTOOL (MGT) Platform, and to ensure that the MYGPMPTOOL (MGT) Platform remain easy to use and navigate.
- (d) Most browsers are initially set up to accept cookies. However, you can reset your browser to refuse all cookies or warn you before accepting cookies.
- (e) If you reject our cookies or similar technologies, you may still use the MYGPMPTOOL (MGT) Platform but may only have limited functionality of the MYGPMPTOOL (MGT) Platform.
- (f) We may also use your IP address to analyse trends, administer the MYGPMPTOOL (MGT) Platform and other websites we operate, track traffic patterns and gather demographic information.

9. Consent

You expressly and freely acknowledge and agree that GPMP, our Authorised Third Parties and each of their officers, employees, agents and contractors are permitted to collect, process, use, share, store, disclose, alter and destroy your personal information in accordance with this policy and the relevant Privacy Laws.

10. Changes to the policy

- (a) We may amend this policy from time to time at our sole discretion.
- (b) Any revised policy will be posted on the MYGPMPTOOL (MGT) Platform and effective from the time of posting.
- (c) Your continued use of our products, services or the MYGPMPTOOL (MGT) Platform following the posting of any revised policy indicates your acceptance of the changes to the policy.
- (d) You should regularly check and read the policy.

11. Complaint

- (a) If you have any issues about this policy or the way we handle your personal information, please contact us using the details below and provide full details of your complaint and any supporting documentation.
- (b) At all times, privacy complaints:
 - (iii) will be treated seriously;
 - (iv) will be dealt with promptly;
 - (v) will be dealt with in a confidential manner; and
 - (vi) will not affect your existing obligations or your commercial arrangements with us.
- (c) Our Privacy Officer will endeavour to:
 - (i) respond to you within 5 business days; and
 - (ii) investigate and attempt to resolve your concerns within 30 business days or any longer period necessary and notified to you by our Privacy Officer.
- (d) If you are dissatisfied with the outcome of your complaint, you may refer the complaint to Office of the Australian Information Commissioner.

12. Contact us

If you have any complaints or issues you wish to raise with us regarding the way we have handled your Personal Information, or would like to discuss any issues about our Privacy Policy, please contact us directly by:

- (a) email at privacy@MyGPMPtool.com.au; or
- (b) calling us on 03-9088 4151