

## PRIVACY POLICY

### Your privacy is very important to us.

Cartula International Pty Ltd is bound by the *Privacy Act 1988* (Cth) (**Act**) and the Australian Privacy Principles (**APPs**). All references to “**we**” or “**us**” refer to Cartula International Pty Ltd.

This privacy policy (“**Privacy Policy**”) describes how we collect, use, store and handle personal information provided to us.

By choosing to engage with us, you confirm and accept the practice described in this Privacy Policy and consent to the collection and use of information as described in this Privacy Policy.

### 1. YOUR INFORMATION

"**Personal information**" is information or an opinion about an identified individual, or an individual who is identifiable: whether or not the information or opinion is true and whether or not the information is recorded in a material form.

The types of personal information that we may collect in relation to you includes the following:

- (a) your name, gender, address, telephone number, date of birth and email address
- (b) your “**health information**”, including known physical and/or mental ailment(s), medical treatment or procedure(s) received, medications, allergies, vaccination records, medical history (including payment records for medical services), records of medical appointments, scans and other medical test results and other records related to your health condition
- (c) When you access or use our service or our website, we may automatically collect information about you. This includes:

- (i). Log and Usage Data

We may log information when you access and use our service. This may include connection information (e.g., mobile operator or ISP, browser type, user-agent string, language and time zone, mobile phone number and IP address), referral URLs, device information (e.g., operating system, device IDs), pages visited, articles visited, links clicked, user interactions (e.g., review data), the requested URL, hardware settings, and search terms.

- (ii). Information Collected from Cookies

We may receive information from cookies. We use this information to improve your experience visiting our website, understand user activity, personalize content and improve the service. For example, we store and retrieve information about your setting preferences. To know more about cookies, or how to manage, disable, or delete them, please visit <https://us.norton.com/internetsecurity-privacy-how-to-clear-cookies.html> or any other relevant source(s) on the web. Please note that we are not responsible for any inaccuracy in

such information resources and you should consult an experienced professional should you have any doubt.

Under the APPs, health information is to be afforded a higher degree of protection than personal information. We will not collect your health information unless you consent to its collection and the health information is reasonably necessary to one or more of our functions or activities.

You are under no obligation to provide personal information to us, or to consent to the collection of your personal information from a third party such as a health care provider, however, a failure to provide all or some of the requested personal information in some circumstances may limit our ability to provide products, services or information to you, to consider an application from you, or otherwise to do business with you.

## **2. Collection of personal information**

### **(a) Directly from you**

We collect your personal information that you provide when:

- You receive services from us - which may include use of our mobile or web applications
- you visit our website;
- you fill out an inquiry on our website;
- you call us to enquire about or apply for any services;
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## **3. Use of Information About You**

We will only use your personal information for the primary purpose(s) for which it was collected, for any secondary purpose that is related to this purpose (provided you would reasonably expect us to do so) and for any other purpose permitted under the Privacy Act. The purposes for which we use the information we collect from you include:

- verifying your identity in connection with your use of the service;
- helping protect the safety of our users, which includes blocking suspected spammers, addressing abuse, and enforcing the website terms and conditions;
- sending you technical notices, updates, security alerts and other support and administrative messages;
- delivering customer service; and
- monitoring and analysing trends, usage, and activities in connection with the service for purpose of monitoring and improving the service.

We may disclose personal information we collect about you:

- to service providers, including suppliers which provide IT and cloud services to us; and
- if required or permitted by law.

When your personal information is disclosed to our service providers, we will take reasonable measures to ensure that those third parties are aware of and comply with this Privacy Policy when dealing with that information.

### **3. Modifications to Privacy Policy**

We may revise this Privacy Policy from time to time. If we update this Privacy Policy, we will post a new version on the website. By choosing to engage with us, you acknowledge and agree to this Privacy Policy, as varied.

Where your information may also be collected by your health care provider, you should also consider whether such collection is subject to any privacy policy or practices that your health care provider may have in place. We are not responsible for use of your personal information by any health care provider.

### **4. Non-Identifiable Health Information**

Anonymous data or non-identifiable data means data that is not associated with or linked to any individual's personal information or will not easily permit the identification of individuals ("**Anonymous Data**"). We may generate Anonymous Data from personal information collected through the website, mobile application, apps and the service by removing information that makes the data personally identifiable to an individual. We may use or share with third parties this Anonymous Data for any reasonable purpose to maintain services and to the extent not prohibited by applicable laws.

### **5. Security**

We maintain reasonable technical, physical, procedural and technical safeguards such as encryption (within apps, in transit and at rest), to protect your personal information against loss, misuse, theft, and unauthorized access. However we cannot guarantee security or that loss, misuse or alteration to data hosted by or on, or accessed by or through, the website or mobile application will not occur.

Your personal information, when support is requested by you, may also be stored by third parties, via cloud services or other technology, to whom we have contracted, where we are satisfied that they have in place adequate physical, procedural and technical safeguards to protect data stored with them.

We take reasonable steps to verify your identity before granting you access to your account under the service through the website or through the mobile application, however, you are solely responsible for maintaining the secrecy of your username, password and any other account information.

Where you entrust another person with your access details or device connected to the service, you will be solely responsible for all activities by such person resulting from sharing or not maintaining the confidentiality of your information.

## **6. Access and correction of personal information**

If you wish to access your personal information held by us or request that your personal information be corrected, please contact our Chief Executive Officer using the details set out in section 8.

Our Chief Executive Officer will endeavour to respond to you within a reasonable time and we will provide access and/or correct the personal information unless an exception under law applies.

## **7. Retention of personal information**

Your personal information may be retained and may continue to be used until: (i) the personal information is no longer needed for any purpose for which the information may be used or disclosed; and (ii) we are no longer required by applicable law, regulations, or mandatory standards to retain the personal information and the retention of your personal information is not otherwise required or permitted under the Privacy Act.

## **8. How can I make a privacy complaint**

If you have any questions about this Privacy Policy or you believe a breach of the APPs has occurred, you can contact the Chief Executive Officer at:

Address: Cartula International, 50 Yeo St, Neutral Bay, NSW 2089, Australia

Email: [info@cartulahealth.com](mailto:info@cartulahealth.com)

Tel: 1800Cartula

Our Chief Executive Officer will endeavour to address and answer any questions or complaints you have in a reasonable time, and may further investigate or take steps in order to resolve the matter.

If you still feel our response was unsatisfactory, you may discuss the issue with us further, or contact the Australian Information Commissioner for more information at:

Website: <https://www.oaic.gov.au/about-us/contact-us/>.

Tel: 1300 363 992

Post: GPO Box 5218, Sydney NSW 2001