

Privacy Policy

Who are we?

PharmaLex are a leading global provider of specialized services for the pharmaceutical, biotech and medtech industries. We guide you from early strategic planning activities and non-clinical requirements through clinical development, regulatory submission processes and post-approval / maintenance post-launch activities. Our experts use technology-enabled solutions to support you through the entire product lifecycle. We deliver exceptional results — going above and beyond the standard to deliver tailor-made solutions worldwide.

In this policy, 'we', 'us' and 'our' refer to PharmaLex Pty Ltd ACN 128 762 505 and our related businesses.

Our Commitment to Privacy

PharmaLex Pty Ltd is bound by and must comply with the Australian *Privacy Act 1988* (Cth) including the Australian Privacy Principles.

We understand how important it is to protect personal and health information. This document sets out our policy for how we collect and disclose the personal and/or health information we hold.

Definitions

Term	Definition
Personal Information	Information from which a person's identity can be reasonably ascertained. This may include both information or an opinion about someone and includes Health Information.
Health Information	Refers to personal information regarding someone's physical or mental health. It also includes information or an opinion about someone's illness, injury or disability.

What information do we collect?

We may collect Personal Information about someone, including:

- Identity information such as name, title, company name, job title, gender and date of birth;
- Contact information, including email address, telephone number(s);
- Employer details and business address (if an individual employed by or representing an organisation with whom PharmaLex is doing business);
- Work history and qualifications (if contacted about employment opportunities or work history with us); and
- Technical and usage information, being details of visits to our website or our physical premises, including traffic data, location data, website usage, IP address and other communication information. Please also refer to the section of this policy following the heading "**Collection of website data**" (refer Section 10).

We may collect health information about someone in connection with adverse event reports which are provided to us or our subcontractors concerning therapeutic products manufactured or sold by our clients, such as drugs or medical devices.

Why do we collect and use personal information?

We collect and use personal information for purposes related to our business activities. We collect personal information when someone interacts with us including when someone:

- Requests information about our sponsored products and/or services;
- Communicates with us as a service provider or customer of the organisation represented;
- Subscribe to our email lists;
- Attend our educational events; or
- Report an adverse event concerning a therapeutic product.

We use personal information to conduct our business including when we:

- Respond to inquiries;
- Conduct advertising and marketing (if it would be reasonable to expect to receive these communications; we will also provide a means of easily unsubscribing from such communications);
- Deliver our services;
- Conduct educational events;
- Consider job applications;
- Improve and develop our services;
- Monitor the safety and efficacy of therapeutic products where we act as sponsor or hold a licence for those products; and
- Report adverse events to therapeutic goods regulators.

In accordance with regulatory obligations, we and our subcontractors have a systematic process in place to collect, store and process reports relating to an individual's health status, when individuals report a concern or adverse health issue in connection with a therapeutic product for which we are a sponsor or licence holder. All such information received and/or forwarded by us or our subcontractors is treated in accordance with local privacy laws and may be submitted to health authorities or therapeutic goods registries as required by law.

Who do we disclose personal information to?

We may disclose personal information to:

- Third party service providers engaged to assist us with conducting our business activities;
- Entities such as government bodies, regulators, law enforcement agencies and other parties where authorised or required by law, and other parties to which we are legally required to disclose personal or health information; and
- Parties identified at the time of collecting the personal information or as otherwise authorised from time to time.

We will not share with third parties any identifiable health information about someone without their consent. This consent may always be revoked at a later date. We will, where practicable, inform third parties to whom any information has been transferred of the withdrawal of consent.

Right of Access

People have the right to access their Personal Information, and they can also request an amendment to this Personal Information if they believe that it is inaccurate.

Access to Personal Information is available by contacting our Managing Director on +612 9906 2984 or by emailing at Grant.Bennett@pharmalex.com.

If we are asked to change the Personal Information held by us:

- We will allow access to the Personal Information or will make the requested change/s unless there is a reason under law to refuse access or refuse to make the requested change/s. If one of these reasons exists, we will advise; and
- If we do not agree to change the Personal Information, we will, if asked, include the request with the Personal Information.

No charge will be levied for requesting access or correction of personal information however, we may charge a small fee to cover our costs of providing access.

Security and Confidentiality

We take reasonable steps to ensure the security and confidentiality of personal information that we collect. When information is collected online, it is subject to security measures and password protection. Access to personal information is restricted to those employees who need to use the data, have been appropriately trained and who we require to observe strict standards of confidentiality.

Overseas Data Transfer

We may transfer personal information collected by or for us to third parties who act for or on behalf of us, and to our related companies, located outside of Australia including in New Zealand, Taiwan, China, and the USA. Such third parties may operate under different privacy laws and policies, however, we take reasonable steps to ensure the overseas recipient complies with the Australian Privacy Principles under the Australian Privacy Act 1988 (Cth) in the way that they hold, use or disclose personal information.

We may have clients that are part of a global enterprise with databases in different jurisdictions. We may transfer personal information to databases outside Australia. We will ensure that if we transfer data to Client databases abroad, we will comply with any obligations we have under the respective privacy principles in relation to that transfer.

Collection of Website Data

Most of the information that we collect when someone visits our website is anonymous information, which is processed by us to help improve the contents of the website and for internal, market research purposes. To collect this anonymous information, “cookies” may be sent via the browser and installed on the hard drive that collect the first level domain name of the user and the date and time of access. “Cookies” by themselves cannot be used to discover the identity of the user.

Questions or Complaints

Any query or concern about our privacy policy and/or management of Personal Information, should be directed to the Managing Director, Grant Bennett, at:

PharmaLex Pty Ltd
Suite 10.04, Level 10
1 Chandos Street
ST LEONARDS NSW 2065

Telephone: 02 9906 2984
Email: Grant.Bennett@pharmalex.com

www.pharmalex.com

We will aim to address any complaint within 30 days. If a complainant is not satisfied by our response, they have a right to complain to the Office of the Australian Information Commissioner. For this purpose:

Visit www.oaic.gov.au; or
Call the OAIC on 1300 336 002

Changes to our Privacy Policy

To reflect changes in regulations and operating procedures, we reserve the right to amend this privacy policy at any time. Refer to the PharmaLex web page or SharePoint site for the current privacy policy.

Revision History

Revision No.	Active Date	Description of Changes	Approved By
1	12-Nov-2020	Initial release.	Grant Bennett
2	15-Dec-2020	Updated for address change.	Grant Bennett
3	26-Aug-2021	Updated for changes to PharmaLex	Grant Bennett