

PHARMALEX PTY LTD

PRIVACY POLICY

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Who are we?

PharmaLex are a leading global provider of specialised services for the pharmaceutical, biotech and medtech industries. We guide our clients 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 clients 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, and the New Zealand *Privacy Act 2020*.

We understand how important it is to protect personal and health information. This document sets out our policy for how we collect, use, and/or 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 Personal 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**".

What Health Information do we collect?

We may collect health information about someone, such as symptoms, side effects, test results and medical diagnoses, for specific and limited purposes relating to the services provided on behalf of our clients. This information may be collected directly from a patient, or indirectly from third parties such as health care providers or carers. For example, we may collect and use health information in connection with:

- Inquiries about the use of therapeutic products manufactured or sold by our clients, such as drugs or medical devices;
- Patient programs, supporting users of particular therapeutic goods; or
- Complaints, or 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, for reporting to health and regulatory authorities.

By providing your personal information to us (including any sensitive information about you, e.g. information about your health and medical details), you are consenting to us collecting, using, disclosing and handling that information as described in this Privacy Policy.

Why do we collect and use Personal Information?

We collect and use personal information for specific and limited 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;
- Subscribes to our email lists;
- Attends our educational events;
- Calls an information service operated by us on behalf of one of our clients;***
- Participates in a “patient program” for users of particular medicines, and the healthcare professionals who advise them ***; or
- Reports 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;

- Provide information and support to users of our clients' medicines, or to healthcare professionals advising users of those medicines***;
- 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 these instances the "personal information" usually includes health information, such as symptoms, side effects, test results and medical diagnoses.

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;
- One of our clients, where the information relates to a person using or inquiring about one of the client's products; and
- Parties identified at the time of collecting the personal information or as otherwise authorised from time to time.

We only disclose identifiable health information for the purposes for which you gave it to us or for directly related purposes you would reasonably expect or for other purposes if we have your consent.

Right of Access

People have the right to access their Personal Information unless certain circumstances set out in the Privacy Principles apply, 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 Data Privacy Officer by email at privacy@cencora.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 reasonable small fee to cover our costs of providing access.

Security, Confidentiality and Retention

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.

Personal and health information is only kept for as long as is reasonably needed and in accordance with any applicable legal reporting or documentation retention requirements.

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 who are located overseas. We may also transfer personal information collected by or for us to our related companies, located outside of Australia including in New Zealand, Taiwan, China, India, the EU and the USA.

A number of our clients are part of a global enterprise with databases in different jurisdictions. We may transfer personal information to our client's databases outside Australia or New Zealand (as applicable).

Third parties located overseas may operate under different privacy laws and policies. However, we take reasonable steps to ensure that each overseas recipient:

- Is covered by data privacy laws substantially similar to those in Australia or New Zealand (as applicable); or
- Agrees to comply with the Australian Privacy Principles under the *Australian Privacy Act 1988* (Cth) or the *New Zealand Privacy Act 2020* (as applicable) in the way that they hold, use or disclose personal and health information.

In the case of our related companies, all PharmaLex entities are committed to appropriate data privacy practices based on the European Union's *General Data Protection Regulation* ("**GDPR**").

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.

Promotional and Marketing Content

You may elect to opt-out of receiving direct marketing and promotional communications by contacting us using the contact details provided below, or by using the "unsubscribe" option in our promotional emails.

Questions or Complaints

Any query or concern about our privacy policy and/or management of Personal Information, should be directed to our Data Privacy Officer via email at privacy@cencora.com.

We will aim to address any complaint within 30 days. If you are not satisfied by our response, you have a right to complain to the Office of the Australian Information Commissioner (OAIC). 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 may change this privacy policy from time to time. If we do, we will publish an updated version on this web page.

This policy is current as at 14th March 2024.