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## **Imaxeon Privacy Policy**

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Abstract: This document defines Imaxeon policy for compliance to the the requirements of the Australian (Commonwealth) Privacy Act 1988 ("The Privacy Act") and the Australian (Commonwealth) Privacy Amendment (Enhancing Privacy Protection) Bill 2012

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# 1 Purpose

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Imaxeon recognises the importance of your privacy and is committed to the management and handling of personal information in an open and transparent way.

Imaxeon is required to comply with the Australian (Commonwealth) Privacy Act 1988 ("The Privacy Act") and the Australian (Commonwealth) Privacy Amendment (Enhancing Privacy Protection) Bill 2012. This Policy sets out how Imaxeon seeks to ensure that any personal information we hold about you is collected, used, stored and disclosed in accordance with the Australian Privacy Principles in the Privacy Act.

In this policy 'personal information' and 'sensitive information' have the same meaning as in the Privacy Act.

This policy does not apply to the handling of personal information about Imaxeon employees. Employee records are exempt from the Privacy Act, but Imaxeon has a separate employee privacy policy.

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## 2 Scope

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This Privacy Policy documents the handling of personal information by Imaxeon Pty Ltd (referred to as "Imaxeon"). 'We', 'our' and 'us' refers to Imaxeon.

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## 3 What information does imaxeon collect and hold?

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Imaxeon may hold information about individuals who may be members of the general public, customers, business contacts, health professionals and others. The information Imaxeon typically holds includes:

### 3.1 Customers and the General Public:

- Your name, relevant address, telephone number(s) and email address;
- Dealings with Imaxeon such as product enquiries and complaints and medical enquiries.

### 3.2 Other individuals such as general business contacts, third party contractors and job applicants:

- Your name, business address, business telephone number(s) and email address;
- Dealings with Imaxeon in respect of general business relationships, or work and employment references, reports and assessments.

### 3.3 Health Professionals:

- Your name, business address, business telephone number(s) and email address;
- Professional details;
- Practice specialty including areas of interest;
- Membership of professional associations;
- Practice and/or business information including Imaxeon product usage;
- Dealings with Imaxeon in respect of medical enquiries, adverse event reporting, clinical trial involvement, details of sales representative appointments and pharmaceutical company sponsored programs such as seminars and meetings.

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## 4 HOW WILL IMAXEON COLLECT AND HOLD YOUR PERSONAL INFORMATION?

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We will, wherever possible, collect information about you directly from you. However, on some occasions it may be collected from other sources, such as:

- Agents or service providers
- Publicly available directories and listings such as telephone directories;
- Newspapers, magazines, professional journals and the electronic media;
- The internet and other electronic communications such as articles and information pieces in which you
- feature on a website such as a health information site or a medical professional site;
- The date, time and domain from which you access a Imaxeon website;
- Personal communications with Imaxeon staff.

Imaxeon will not collect sensitive information about you, such as information about your health, race or professional associations, without your consent.

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## 5 COLLECTION THROUGH IMAXEON WEBSITES

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In addition to some websites which provide for direct input of personal information, most Imaxeon websites make use of 'cookies' which are small text files that are stored in the visitor's local browser cache. Using such cookies it is possible to recognise the visitor's browser in order to optimise the website and simplify its use. Data collected via cookies will not be used to determine the personal identity of the website visitor. Most browsers are set up to accept these cookies automatically. In addition, you can deactivate the storing of cookies or adjust your browser to inform you before the cookie is stored on your computer. Some Imaxeon websites may not offer full functionality unless you accept cookies.

Imaxeon increasingly makes use of web analytics, including analysis by third party service providers, which may use IP addresses. While this may in some circumstances be 'personal information' neither Imaxeon nor the service providers have any interest in individuals' browser activity and will not use the information to take any action targeted to individuals.

Imaxeon will also not collect, process or use on our websites information relating to an individual we know to be under 13 years of age, without the prior verifiable consent of his or her legal representative. Such legal representative has the right, upon request, to view the information provided by the child and/or to require that it be deleted.

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## 6 What does imaxeon do with your personal information?

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### 6.1 Use

Personal information collected and held by Imaxeon may be used for one or more of a variety of purposes depending on the circumstances. These include:

- Normal sales and customer service functions including order processing and fulfilment, accounting, and responding to enquiries or complaints;
- Meeting legal requirements such as notification of product withdrawals and recalls, and monitoring compliance with relevant regulations and codes of conduct;
- Imaxeon's marketing and market research.

### 6.2 Direct marketing

You may request that we do not send you information regarding our programs, events, services or products which we think may be relevant to you (direct marketing). In such a case, we will take reasonable steps to ensure we do not send you marketing material.

### 6.3 Disclosure

Imaxeon may disclose information about you in the course of any of the uses described above, including to related businesses and third party service providers, such as for order delivery, marketing, data processing, printing and mailing, and organizing conferences. Imaxeon will use only reputable service providers and will ensure that contractual provisions safeguard your privacy.

We will otherwise only disclose personal information about you to a third party where required by law, including to regulatory authorities; and then only that information which is necessary.

Imaxeon is required by law to report adverse events to relevant regulatory authorities (such as the Therapeutic Goods Administration). Adverse events are negative medical events experienced by a person who has received treatment with a medicinal product. Any actual or suspected adverse events should be reported to Imaxeon by contacting us on (free call in Australia) 1800 673 270.

### 6.4 Overseas Recipients

Imaxeon is a member of the Bayer Group of Companies, a global organization with offices within and outside of Australia.

Information held by Imaxeon about you may in some circumstances be stored on Imaxeon databases housed in overseas locations including but not limited to Germany, China, the Philippines and the United States of America. All Imaxeon companies are committed to compliance with internal data protection policies which contain provisions substantially similar to the Australian Privacy Principles, and in many cases to similar laws in the other jurisdictions.

Imaxeon also deals with external service providers located in countries within and outside of Australia, such as in Singapore, and in such cases, Imaxeon takes reasonable steps, including by contract provisions, to ensure that these service providers do not breach the Australian Privacy Principles.

### 6.5 Use of Customer Information for Promotional, Analysis, or Training Purposes

Imaxeon may request and be granted use of customer information for the purposes of promotion, analysis or training. When this is approved by the customer, Imaxeon will ensure all personally-identifiable information will be removed prior to use.

### 6.6 Security and retention

Imaxeon uses technical and organisational security precautions to protect your data from misuse, interference or loss and from unauthorised access, modification or disclosure. Any personal data that is provided to Imaxeon by you through Imaxeon systems will be encrypted in transit to prevent its possible misuse by third parties. Our security procedures are continuously revised based on new technological developments.

Imaxeon will delete from its records personal information no longer required or if we are required to retain it (e.g. clinical trial records, or tax information), then wherever practicable it will be held in a form that does not permit your identity to become apparent.

You may notify us at any time that you do not wish us to retain your personal information, and wherever practicable and lawful we will comply with such a request.

## 6.7 Access to information retained by Imaxeon

You may request access to your personal information and may seek to have it corrected if you believe it is inaccurate, out of date, incomplete, irrelevant or misleading.

Access or correction requests should be sent to the Quality and Regulatory Manager at the address below.

Your request should give as much detail as possible to help us locate information about you such as your name, contact details, any former name, and if possible the context, for example, your relationship with us. Please specify any particular information to which you are seeking access.

Imaxeon will respond to your request within 30 days of receipt or within any further time notified to you in writing.

## 7 Access To Onsite Customer Information

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In the course of providing sales or technical support, it may be necessary for Imaxeon staff to be allowed remote access to customer systems, which hold sensitive privacy information. Imaxeon staff may also be present onsite, and view systems containing such information.

In these instances, Imaxeon staff will ensure compliance to the customers' privacy policy and will not copy or retain any privacy information not offered to Imaxeon.

## 8 Complaints about a breach

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All enquiries or complaints regarding your privacy should be made in writing to:

The Privacy Officer  
875 Pacific Highway  
Pymble NSW 2073  
Australia  
Phone: +61 2 9391 6000  
Or by email:  
privacy.officer.anz@bayer.com

Imaxeon will ensure that your complaint is responded to within 30 days of our receipt of your correspondence. If we cannot meet this timeframe we will contact you and provide you with a reasonable estimate of the length of time we require in order to resolve your complaint or enquiry.

Imaxeon reserves the right to make changes to this Privacy Policy from time to time, but will ensure that they are posted to our website without delay.