

# Star Pharmacy Group Pty Limited Privacy Policy (**Privacy Policy**)

## 1. **Privacy Act**

- 1.1 This Privacy Policy outlines how Star Pharmacy Group Pty Ltd ABN 42 480 086 042 trading as Star Pharmacy Group (**SPG, we, us or our**) uses and manages personal information.
- 1.2 SPG is bound by the Australian Privacy Principles (**Principles**) contained in the *Privacy Act 1988* (Commonwealth) (**Privacy Act**). We will collect, use and retain personal information in accordance with the Principles.
- 1.3 Other policies may override this Privacy Policy in certain circumstances. For example, when we collect personal information from you, we may advise a specific purpose for collecting that personal information, in which case we will handle your personal information in accordance with that stated purpose.
- 1.4 This Privacy Policy applies to personal information collected, used or retained by us (and our authorised agents). It applies to all information we hold about you through your use of our services including information obtained via electronic devices (e.g. personal computer, mobile telephone, mobile tablet or other consumer electronic device) used to access our services. If you have any queries about our collection, use or retention of your personal information, please contact our Privacy Officer for further information (contact details for our Privacy Officer are set out in section 11 of this Privacy Policy).
- 1.5 By providing personal information to us, you consent to our collection, use and disclosure of that information on the terms of this Privacy Policy and any other contractual or other arrangements (if any) that may apply between us.

## 2. **What personal information we collect**

- 2.1 The type of personal information that we collect and hold includes (but is not limited to) your name, address, contact telephone number(s) and/or email address(es). We may also hold information about any products or services you acquire from us or our dealers, any warranty claims made in connection with those products or services, and any other personal information that you volunteer to us.
- 2.2 We do not collect (or, if it is provided by you to us, retain) any sensitive information about you.

## 3. **How we collect, hold, use and disclose personal information**

### 3.1 **Collecting personal information**

- 3.1.1 We collect personal information directly from you, in person or from our website (**Website**) or our application for use with mobile telephones, mobile tablets or other consumer electronic devices (**Mobile App**). We may also collect your personal information

from third parties (such as market research companies acting on our behalf) that have collected personal information from you. Where we collect personal information from third parties, we will take reasonable steps to notify you or otherwise ensure you are aware of the fact that we are collecting personal information from you and the circumstances of its collection.

3.1.2 When collecting personal information, we will take reasonable steps to make you aware of the purposes for which the information is being collected by us, the organisations to which we would usually disclose your information, the main consequences for you if you fail to provide any information that is requested by us, and whether we are likely to disclose your information to overseas recipients as well as the countries any such recipients are located in. This Privacy Policy provides these details as they typically apply in most cases, however different details may apply depending on our specific interaction with you. If we do not notify you of such other details, the information in this Privacy Policy applies.

3.1.3 There may be a range of consequences if you fail to provide information requested by us. For example, we may be unable to process your request for products or services or communicate with you. The provision of that information by you is purely voluntary.

## 3.2 Holding personal information

3.2.1 We take active steps to ensure that your personal information is protected from misuse, loss, unauthorised access, modification or disclosure.

3.2.2 Specific security measures we employ include authorised user-only password protected access to computer records, internal procedures to protect physical documents and monitoring of our practices and systems to ensure the effectiveness of our security policies.

3.2.3 We will endeavour to destroy or de-identify your personal information as soon as it is no longer required by us (and as permitted by law).

## 3.3 Using personal information

3.3.1 From time to time, we will collect, use and disclose your personal information for a particular purpose (**the primary purpose**). We may use or disclose the personal information we hold about you for other purposes (**secondary purpose**) if you consent to use or disclosure for the secondary purpose.

3.3.2 We may also use or disclose the personal information we hold about you for a secondary purpose, without specific consent, if the secondary purpose is something you would reasonably expect and is related to the primary purpose.

3.3.3 The following examples may assist. We generally collect, hold and use your personal information to:

3.3.3.1 provide the service requested, respond to your enquiries, send you information that you request, or otherwise achieve the purpose for which the information was submitted to us;

3.3.3.2 contact you to ask about your experiences with, or impressions of, our products or services;

3.3.3.3 contact you from time to time to advise you of new products, promotional offers, or services offered by us or our dealers that we consider may interest you;

3.3.3.4 conduct market research or monitor product demand (although where possible we will use “de-identified” information that does not refer to particular individuals when conducting these activities);

3.3.3.5 contact you about other matters relating to products or services that you have acquired from us;

3.3.3.6 streamline and personalise your experience within the Website or Mobile App, or tailor our information, services or products to you;

3.3.3.7 create aggregate data about our website visitors and other statistics to allow for more efficient operation of the Website or Mobile App; and

3.3.3.8 engage in other activities where required or permitted by law.

3.4 We may use personal information to contact you for marketing and promotional purposes. You may request not to receive these communications by contacting our Privacy Officer (contact details for our Privacy Officer are set out in section 11 of this Privacy Policy), or by using the opt out function as provided in those communications. If you do not opt out in either of these ways we will assume you have consented to receiving such communications from us.

3.5 There are no consequences for opting out of receiving our marketing and promotional communications except that you will no longer receive them, and you may elect to re-join our marketing list at a later stage if you wish.

3.6 Where we propose to use your personal information for another purpose other than as outlined above, we will seek your express consent prior to using your personal information for that purpose (unless we are required or permitted by law to do so without seeking your permission).

### 3.7 **Disclosing personal information**

3.7.1 We may disclose your personal information to:

3.7.3.1 our authorised agents, franchisees, contractors or subcontractors that provide administrative or promotional services (for example, mail processing businesses, printers, or market research companies or other service providers). We enter into contractual agreements with these organisations to ensure that information we disclose is used only for the limited purposes for which we have provided it; and

3.7.3.2 our related bodies corporate.

3.8 Where we propose to disclose your personal information for another purpose other than as outlined above, we will seek your express consent prior to disclosing your personal information for that purpose (unless we are required or permitted by law to do so without seeking your permission). An example is when we are compelled to disclose personal information for certain law enforcement purposes.

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

4.1 You have the right to obtain access to any personal information we hold about you. You have the right to contact our Privacy Officer to request access to or correction of your personal information held by us (contact details for our Privacy Officer are set out in section 11 of this Privacy Policy). We will respond to your request for access or correction within 30 days from receiving your request.

4.2 We may require you to verify your identity before we allow you to access your personal information, for the protection of your privacy and the privacy of other individuals whose personal information we hold.

4.3 We may refuse to allow you to access or to correct your personal information if we are legally required or entitled to do so. If we do so, we will provide you with written reasons for the refusal (unless it is unreasonable to do so) and the options available to you to complain about our refusal.

4.4 If you lodge a request for access, we may provide you with access to your personal information in any of a number of ways (including, for example, supplying you with a copy or providing you with the opportunity to inspect our records).

4.5 We take reasonable steps to ensure that the personal information that we collect, use and disclose is accurate, up to date and complete. If we are satisfied that any personal information we hold about you is inaccurate, out of date or incomplete, we will amend our records accordingly.

4.6 We do not impose any fee on you to make a request to access personal information we hold. However we may require you to pay a reasonable fee to cover the cost of verifying an application for access and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise you of the likely cost in advance.

## 5. **Dealing with us anonymously**

You may deal with us anonymously or by using a pseudonym when making a general enquiry about the services we can provide.

## 6. **Online privacy**

This part of our Privacy Policy sets out the manner in which we handle your personal information in respect of online services provided to you by us. Online services includes any services provided by us via the Internet (including email, our Website or our Mobile App) (**Online Services**).

### 6.1 **Automatic server logs**

6.1.1 Our Online Services servers automatically collect various items of information when you access our Online Services. For example, we may collect information about your electronic device's operating system, Internet Protocol (IP) address, access times, browser type and language, and if applicable, the website that referred you to us. We also collect information about your usage and activity on our Online Services.

6.1.2 When you visit our Online Services, 'cookies' may be stored on your electronic device. The purpose of cookies are to avoid the need for you to re-enter certain information when you next visit our Online Services. The settings in your Internet browser software can be adjusted to prevent cookies being stored on your electronic device, if you wish. However, some of the features and functionality of our Online Services may then be lost.

6.1.3 Although, in some circumstances, it may be possible to identify you from the information we collect as described in section 6.1.1, we do not attempt to do so, and only use this information for statistical analysis, system administration, and similar purposes.

### 6.2 **Email and message forms**

6.2.1 We may collect personal information from you if you send us an email or if you submit information to us using a message form, brochure request form or feedback form via our Online Services. We will use this personal information to contact you, respond to your message, to send you information that you request, and for other related purposes we consider you would reasonably expect. We will not use or disclose any personal information for any other purpose without your express consent.

### 6.3 **Storage and transmission of personal information online**

6.3.1 There are inherent risks in transferring information across the Internet. If you provide any personal information to us via our Online Services or if we provide such information to you by such means, the privacy, security and integrity of this information cannot be guaranteed during its transmission unless we have

indicated beforehand that a particular transaction or transmission of information will be protected (for example, by encryption).

- 6.3.2 If we receive your personal information, we will take reasonable steps to store it such that unauthorised access, modification, disclosure, misuse and loss are prevented.

#### **6.4 Other online services**

- 6.4.1 If any of our Online Services contain links to other online services that are not maintained by us, or if other services link to our Online Services, we are not responsible for the privacy practices of the organisations that operate those other services, and by providing such links we do not endorse or approve the other services. This Privacy Policy applies only in respect of our Online Services.

#### **6.5 Third party advertising**

- 6.5.1 We may allow third parties to use cookies or other tracking technologies to collect non-personal information about your use of our Online Services, including your IP address, pages viewed and conversion information. This information may be used, among other purposes, to deliver advertising targeted to your interests and to better understand the usage and visitation of our Online Services and other websites tracked by these third parties. We may at times use "Remarketing" (<https://www.google.com.au/ads/innovations/remarketing.html>) to advertise online. Third party vendors, including Google, may show our ads on sites across the Internet. This Privacy Policy does not apply to, and we are not responsible for, third party cookies or other tracking technologies. We encourage you to check the privacy policies of advertisers and/or ad services to learn more about their privacy practices.

### **7. Cross-border data transfer**

- 7.1 We operate only within Australia and will not provide your information to parties in any other country. We do from time to time, however, use web-based programs in relation to our Online Services for particular activities such as email broadcasts which may be hosted overseas.
- 7.2 As well, web traffic information we collect using Google Analytics may be stored overseas.

### **8. Notifiable data breaches**

- 8.1 A data breach occurs when personal information is lost or subject to unauthorised access, modification, disclosure, or other misuse or interference. A data breach may be intentional or unintentional.
- 8.2 Examples of a data breach which may meet the definition of an eligible data breach under the Privacy Act include when:

- 8.2.1 a device (such as a laptop) containing personal information is lost or stolen;
  - 8.2.2 a database containing personal information is accessed without authorisation; or
  - 8.2.3 personal information is mistakenly provided to the wrong person.
- 8.3 The Privacy Act only requires notification when an 'eligible data breach' occurs. An eligible data breach occurs when:
- 8.3.1 there is unauthorised access to or disclosure of personal information that we hold (or information is lost in circumstances where unauthorised access or disclosure is likely to occur); and
  - 8.3.2 this is likely to result in serious harm to any of the individuals to whom the information relates; and
  - 8.3.3 we have been unable to prevent the likely risk of serious harm with remedial action.
- 8.4 Where we suspect that an eligible data breach may have occurred, we will carry out a reasonable and prompt assessment of whether there are reasonable grounds to believe that an eligible data breach has occurred. If, based on that assessment, there are reasonable grounds to believe that an eligible data breach has occurred, we will:
- 8.4.1 immediately take appropriate steps, decided on a case-by-case basis, to contain the breach and prevent further breaches;
  - 8.4.2 prepare an eligible data breach statement (**Statement**) as prescribed under the Privacy Act, and submit the statement to the Office of the Australian Information Commissioner (**OAIC**);
  - 8.4.3 notify individuals to whom the relevant information relates or who are at risk from the breach either:
    - (a) directly, by taking reasonable steps to notify the contents of the Statement to each of the affected individuals; or
    - (b) if that is not possible, by publishing the contents of the Statement on our Website and Mobile App and taking reasonable steps to publicise the contents of the Statement; and
    - (c) review the incident and consider action to prevent future breaches.

## 9. Changes

- 9.1 We reserve the right, as it may be necessary, to review, revise or make changes to this Privacy Policy at any time. We will notify you of amendments to this Privacy Policy by posting those changes to our Website and Mobile App.

- 9.2 You may request a hard copy of the current version of our Privacy Policy by contacting our Privacy Officer (contact details for our Privacy Officer are set out in section 11 of this Privacy Policy).

## 10. **Complaints**

- 10.1 If you would like further information about the way we manage personal information we hold, or wish to complain that you believe we may have breached the Principles, please contact our Privacy Officer in writing (contact details for our Privacy Officer are set out in section 11 of this Privacy Policy). We will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable.

- 10.2 If you are not satisfied with our decision, you may contact the OAIC to lodge a complaint. The contact details of the OAIC are:

Post: GPO Box 5218, Sydney NSW 2001

Telephone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Fax: (02) 9284 9666

## 11. **Privacy Officer – contact information**

- 11.1 You may contact our Privacy Officer by:

Post: Star Pharmacy Group, 2/108 Rundle St, Kent Town SA 5067

Telephone: (08) 8443 7955

Email: [privacy@starpharmacy.com.au](mailto:privacy@starpharmacy.com.au)