

# Clarity Pharmaceuticals Ltd

## Privacy Policy

### 1 OBJECTIVE OF THIS POLICY

- 1.1 This is the Privacy Policy of Clarity Pharmaceuticals Ltd ACN 143 005 341 (**Clarity, we, our or us**) in relation to Personal Information we collect and hold for the operation of our business. Clarity is committed to protecting your privacy. We handle your Personal Information in accordance with this Privacy Policy and our obligations under Australia's *Privacy Act 1988* (Cth).
- 1.2 This Privacy Policy explains:
- (a) How and when we collect your Personal Information
  - (b) The types of Personal Information we collect about you
  - (c) Why we collect your Personal Information
  - (d) Who we share your Personal Information with
  - (e) Direct marketing communications
  - (f) Access to and correction of your Personal Information
  - (g) Storage and security of your Personal Information
  - (h) Privacy queries or complaints
  - (i) Our contact details
  - (j) Updates to this Privacy Policy
- 1.3 **Personal Information** includes Sensitive Information and is any information or an opinion about an identified individual, or an individual who is reasonably identifiable.
- 1.4 **Sensitive Information** includes information or an opinion about an individual's: racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual orientation or practices; criminal record; Health Information about an individual; genetic information about an individual that is not otherwise health information; biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or biometric templates.
- 1.5 **Health Information** includes any information relating to employee health which might be required to be collected for human resources purposes for that employee. The company collects data in relation to human clinical trials which it conducts. This data is not considered to be Health Information for purposes of this Policy as it is only ever collected in a de-identified form and cannot be traced to any individual.

### 2 POLICY

#### How and when we collect your Personal Information

- 2.1 The Personal Information we collect about you will depend on who you are (i.e. a job applicant, an employee or a shareholder) and our interactions with you. We generally collect Personal Information about you directly from you.
- 2.2 We collect your Personal Information when you:
- (a) visit and use any of our digital sites or physical premises;

- (b) contact or correspond with us or provide feedback or lodge an enquiry with us (whether by email, phone, mail or online);
- (c) order and purchase or otherwise receive our products or services;
- (d) engage with us to provide us with your services;
- (e) subscribe to our communications;
- (f) invest in our business;
- (g) request information about us, our products or our services;
- (h) post or contribute material to or engage with the use on any of our digital sites or social media channels; or
- (i) submit a job application to us and we contact any referees referred to in your job application.

2.3 Where possible and lawful, you may interact with us anonymously or using a pseudonym. For example, if you contact us with a general question we will not record your name unless we need it to adequately respond to your question. However, for many of our functions and activities, we usually need your name, contact information and other details to enable us to respond to your request, provide our services to you and comply with our obligations.

2.4 Our digital sites make use of analytical and location-aware technologies. While using our digital sites, anonymous user location information is obtained (e.g. rough latitude and longitude) through the user's IP address to present more relevant data and provide information about user traffic. This information is not shared with any third party providers.

#### **The types of Personal Information we collect about you as an employee or consultant**

2.5 The types of Personal Information we may collect about you are:

- (a) your contact details, such as name, email address and telephone number;
- (b) your delivery details, such as your address;
- (c) your date of birth (or age);
- (d) your gender;
- (e) your unique username and password;
- (f) your payment details;
- (g) your Health Information; and
- (h) if you are a job applicant, other information from your curriculum vitae or job application submitted to us including education history, professional qualifications, prior job experience and memberships.

#### **Why we collect your Personal Information**

2.6 We collect your Personal Information to assist us in the conduct and operation of our business. In particular, the purposes for which we collect your Personal Information include to:

- (a) supply you with our services;
- (b) to conduct clinical trials to test our products and services;
- (c) communicate with you, including by social media, and provide you with information, products or services you have requested;
- (d) respond to your enquiries;

- (e) promote and market our products and brands, services and events to you or provide you with information about products and brands, services and events which we believe may be of interest to you from us;
- (f) if you are a supplier, assess your credit worthiness;
- (g) risk and operational management processes;
- (h) research and development;
- (i) quality process or service improvement projects;
- (j) process a job application you submit;
- (k) complying with our legal obligations;
- (l) in cases of an emergency to prevent or lessen a serious threat to somebody's life or health; and
- (m) to conduct, respond to and manage investigations, complaints, and claims.

#### **Who we share your Personal Information with**

- 2.7 In order to operate our business we may disclose, or provide access to, some or all of your Personal Information to certain third parties for the purposes described above. These include to:
- (a) third parties we contract to assist with the development or manufacture of our products and provision of our services;
  - (b) our related entities; and
  - (c) our professional advisers, insurers, credit reporting bodies and debt collection agencies.
- 2.8 We may also disclose your Personal Information to relevant public, government or regulatory authorities, our legal representatives or other concerned parties, in certain circumstances required or authorised by law.
- 2.9 Some of the third parties to whom we disclose your Personal Information may be located outside Australia.
- 2.10 We may also transfer personal data in connection with a merger or sale involving all or part of the shares in Clarity or the assets owned by Clarity or as part of a corporate reorganisation or share sale or other change in corporate control.

#### **Direct marketing communications**

- 2.11 We may, with your consent, use your Personal Information that we have collected about you to contact you from time to time whether by phone, email or post to provide you with information regarding our programs, services, events and opportunities, or to ask you for your support.
- 2.12 You can withdraw your consent to receiving direct marketing communications from us at any time by unsubscribing from the mailing list. You can do this by contacting our relevant Privacy Officer in accordance with section 4 of this Privacy Policy or opting out as directed in any of our communications to you.

#### **Access to and correction of your Personal Information**

- 2.13 You have the right to access and to request correction of the Personal Information we hold about you. If you wish to access, correct or update any Personal Information we hold about you, you can contact us using the details set out in section 4 below. We may refuse access to

some or all of the information requested in certain circumstances permitted by applicable laws.

### **Storage and security of your Personal Information**

- 2.14 We take reasonable steps to keep your Personal Information secure and have dedicated security staff. Any Personal Information that is collected via our sites or which is stored on our IT systems is protected by a range of safeguards and security measures including physical, technical and procedural methods.
- 2.15 We will destroy Personal Information after it is no longer required for any purpose for which it was collected by us or we are otherwise required under law.

## **3 PRIVACY QUERIES OR COMPLAINTS**

- 3.1 If you have any questions or concerns about this Privacy Policy, how we have handled your Personal Information, or if you wish to make a complaint, please contact us using the details in section 4 below.
- 3.2 We will respond to you within a reasonable time to confirm receipt and if necessary, your identity. We will investigate your enquiry or complaint and endeavour to respond to you promptly. If you are not satisfied with our resolution of your complaint, you may contact the Office of the Australian Information Commissioner (OAIC) to make a complaint via their website at [oaic.gov.au](http://oaic.gov.au) or by phone on 1300 363 992.

## **4 CONTACT DETAILS**

- 4.1 If you have a query about this Privacy Policy or how we have handled your Personal Information, or you wish to request access to or correction of your Personal Information or to make a complaint, please contact the nominated Privacy Officer (CFO) using the following contact details:
  - (a) E-mail: [Robert.vickery@claritypharmaceuticals.com](mailto:Robert.vickery@claritypharmaceuticals.com)
  - (b) Post: 4 Cornwallis Street, Eveleigh NSW 2015

## **5 UPDATES TO THIS PRIVACY POLICY**

- 5.1 We may, from time to time, review and update this Privacy Policy. Any changes will be published on our digital sites and will apply to the Personal Information we hold. By continuing to use our digital sites, or otherwise continuing to deal or engage with us, you accept this Privacy Policy as it is updated from time to time.

**Adopted by the Board on 16 July 2021**