

This Privacy Policy details how Wellnex Life Ltd (ACN 150 759 363) (**Wellnex Life, us, we, our**) deal with your (**you, your**) personal information and has been developed in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (**Privacy Act**). Information on how our individual brands (Bird Health, Challs, Compeed, EllaOne, Koéna, Little Innoscents, Performance Inspired, Plumrose, Simply 7, Solar Care B3, SupaGarlic, The Iron Company, Uganic, Voost and Wakey Wakey) deal with your personal information is contained within privacy policies found on each of the brand's websites.

Under the Privacy Act, personal information means any information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not and whether recorded in a material form or not. Sensitive information is a subset of personal information and includes health information. This policy is subject to any applicable state or territory health information laws.

By providing your personal information to us directly or indirectly you accept the terms of this Privacy Policy.

## **1. What kinds of information do we collect?**

The type of information that we collect from you will depend on how you engage with us. We will collect the following: name, contact information including address and email address and any other personal information that you submit to us via our investor centre, our websites or any other platform we may introduce in future, including wellnex.com.au (**Site**). We also may collect your personal information through the activities of our brands, because we have a supplier or procurement relationship with you or your employer or because you are an employee or contractor of Wellnex Life or our subsidiary companies.

We will only collect sensitive information if it is relevant to providing our services and usually this will be more relevant to our brands rather than Wellnex Life itself.

## **2. How do we collect your personal information?**

We collect your personal information directly from you or via our subsidiary companies. The main ways we collect personal information about you are when you:

- request to receive the services offered and provided by us (for example, you request to be an investor in Wellnex Life);
- complete a registration on our Site; and
- you otherwise submit personal information about yourself, or someone else, to us, or our Site or otherwise, including for the purposes of applying for a vacancy.

Unless otherwise permitted by law, we will only collect your personal information from third parties, if you give your consent for the third party to provide the information to us or it would be reasonably expected. We will only collect sensitive information with your consent.

### **What if we receive information about you that we didn't request?**

If someone other than you provides us with personal information about you that we did not ask for, or you provide us with unsolicited personal information, we will only hold, use or disclose this information if we determine that we could have collected this information from you had we asked for it. In this circumstance we will take all reasonable steps to notify you of the collection of that information. If we could not have collected this personal information, we will lawfully de-identify or destroy that personal information.

### **3. If you are under 18 years of age**

If you are under 18 years of age you must ask your parent or legal guardian to approve your provision of personal information before you submit your personal details to us.

### **4. Use of personal information**

This Privacy Policy deals with personal information of patients, registered users, contractors, service providers and other third parties.

We will only use your personal information for the purposes for which it was given to us, or for purposes which are directly related to the provision of our services.

#### **How will we use your personal information?**

Your personal information may be used by us in a number of ways, including to:

- to assist you to conveniently and easily access the services that we offer and provide, including investing in Wellnex Life;
- to be able to improve the services the Site offers you;
- for internal record keeping;
- if you apply for a contractor or employment position with us, to assess your suitability for the role and to facilitate your position; and
- to periodically send communications to you.

### **5. Disclosure of personal information**

In certain circumstances, it may be necessary for us to disclose your personal information to third parties in order to assist us in providing our services, or where disclosure is required by us to meet our legal and regulatory obligations. Third parties may include:

- technology support service providers where applicable to the service provided to you;
- data storage providers such as Google (servers located in various locations around the world);
- government and law enforcement agencies and regulators; and
- entities established to help identify illegal activities and prevent fraud where authorised by law.

We may also disclose your personal information to anyone authorised by you, or to whom you have provided your consent (either expressly or impliedly) or where another permitted general situation applies (as defined in Section 16A of the Privacy Act).

To the extent required by law, we will obtain your consent before disclosing sensitive information to third parties.

We may share your personal information inside the Wellnex Life group of companies and to potential investors in Wellnex Life, but only to the extent necessary. If we go through a business transition, such as a merger, acquisition by another company, or a sale of all or a part of our

business assets, your personal information may be among the assets transferred, to the extent allowed by law.

We will not disclose information that personally identifies you to any third party other than as set out in this Privacy Policy.

## **6. Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We may use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve the Site in order to tailor it to users' needs. We only use this information for statistical analysis purposes, after which the data is removed from the system.

Overall, cookies help us provide you with a better customer experience by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the Site.

## **7. Direct marketing**

We use personal information about you for the primary purpose of providing you with our services. We may also use personal information (other than sensitive information, which requires your consent) for other purposes for which you might reasonably expect us to use that information. You authorise us to use any email address or other contact information you provide to use at any time for such above purposes.

You can opt out of receiving electronic communication at any time. You agree and acknowledge that even if you opt out of receiving information about future events or marketing material, we will still send you essential information that we are required to send you relating to the services we provide.

## **8. Storage and security**

The security of your personal information is paramount to us and we use all reasonable endeavours to keep your information in a secure environment and to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. If you reasonably believe that there has been unauthorised use or disclosure of your personal information please contact us using the details below.

We keep records of the personal information we gather from you and store these on an encrypted server in digital format. You warrant that you will not act in a manner that results in us collecting, using or storing information that is in breach of our obligations at law.

If we no longer need your personal information, unless we are required under Australian law or a court or tribunal order to retain it, we will de-identify your personal information as appropriate.

## **9. Notifiable Data Breaches**

In the event of a data breach, where your personal information is involved in the breach, we will notify you, the Office of the Australian Information Commissioner (**OAIC**) and any other relevant authorities, if the breach is likely to result in serious harm to you.

## **10. Accuracy of your information**

We take reasonable steps to ensure that the personal information held by us is accurate, complete and up to date. If you believe that any of your personal information is inaccurate, please contact us using the below details and we will take reasonable steps to correct it.

## **11. Variation and consent to variation**

We may vary the terms of this Privacy Policy at any time. You should check this Privacy Policy regularly so that you are aware of any variations made to this Privacy Policy.

## **12. Disclosure to overseas recipients**

To assist in providing our services, we use Google Firebase, whose services are provided, supported and hosted in various locations around the world, including the United States. To the extent that the laws and rights of these countries are not equivalent to the laws of Australia, you agree to be bound by the laws and rights of the relevant extraterritorial jurisdiction. These countries have data protection laws that are not equivalent to the laws of Australia and you may not have equivalent rights of enforcement.

## **13. Access to your information and making a complaint**

You may request access to the personal information we hold about you. If you do so we will respond to your request within a reasonable period of time and, where reasonable and practicable, give access to the information in the manner you request. This will be subject to any exemptions provided under the Privacy Act. You may request this information by writing to our Privacy Officer.

Where it is practical to do so, when contacting us, you have the option to either not identify yourself or to use a pseudonym. However, this will not apply if we are required or authorised under Australian law (or a court or tribunal order) to only deal with individuals who have identified themselves.

If you wish to make a complaint about a breach of the Privacy Act by us, you may do so by providing your complaint in writing to the contact details listed below. You may also make a complaint verbally. We will seek to respond to any complaint within a reasonable period of time. We may seek further information from you in order to provide a comprehensive and complete response.

You may also make a complaint to the OAIC. You may contact the Australian Information Commissioner via telephone on 1300 363 992, by submitting a complaint or inquiry online at [www.oaic.gov.au](http://www.oaic.gov.au) or by writing to the OAIC at GPO Box 5218 Sydney NSW 2001.

## **14. Contact us**

If you have any questions, or if you wish to contact us for any of the reasons described above, including to correct or access the information we hold about you or to make a complaint, please contact our Privacy Officer:

The Privacy Officer

Address: Wellnex Life Ltd  
574 Plummer Street  
Port Melbourne, VIC, 3207, Australia

Email: [info@wellnexlife.com.au](mailto:info@wellnexlife.com.au)

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