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## MR Assist Privacy Policy

### 1. Introduction

- 1.1 MR Assist ('MR Assist', 'we', 'our', and 'us') considers the privacy of the users of its products and services to be of supreme importance. MR Assist has based its privacy policy ('Privacy Policy') on the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth), *Privacy Act 1988* (Cth) and Australian Privacy Principles.
- 1.2 This Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing and protection of your personal information. It applies to the MR Assist website ([www.mrassist.com.au](http://www.mrassist.com.au)) and all related sites, applications and services.
- 1.3 You accept this Privacy Policy when you sign up for, access, or use our products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services.

### 2. Policy Updates

- 2.1 We may amend this Privacy Policy at any time by posting an updated version on the MR Assist website. The revised version will be effective immediately from the time it is posted.
- 2.2 In addition, if the revised version includes a substantial change, we will provide you with 30 days' prior notice by posting notice of the change on the "Policy Updates" page of our website. After this 30 day notice period, you will be considered as having expressly consented to all amendments to this policy.

### 3. Who we collect information from

We collect personal information from users of the MR Assist website.

### 4. How we collect information about you

- 4.1 We collect information when you visit the MR Assist website. This is information sent to us by your computer, mobile phone or other access device and includes your computer IP address, device identifiers, your location, standard web log data and other information. Web log data includes the browser type you're using and traffic to and from our site. When you visit the MR Assist website, we also collect information about your activities.
- 4.2 When you subscribe to the MR Assist website or complete any forms/application on the MR Assist Website, we may also collect the following personal information:
  - 4.2.1 Contact information, such as your name, address, phone, email and other similar information;
  - 4.2.2 Financial information, such as the full bank account numbers and/or credit card numbers that you link to your MR Assist account; and
  - 4.2.3 Detailed personal information such as your date of birth.
- 4.3 In certain circumstances, we will collect personal information from third parties. For example, from:
  - 4.3.1 a credit reporting agency
  - 4.3.2 an individual's financial advisers
  - 4.3.3 an individual's representatives (e.g. authorised representatives or legal advisers)

- 4.3.4 an individual's employer
  - 4.3.5 an individual's health service provider
  - 4.3.6 an individual's treating health professional
  - 4.3.7 publicly available sources of information or
  - 4.3.8 any other organisation identified below (see 'Disclosing personal information' below).
- 4.4 You may choose to provide us with access to certain personal information stored by third parties such as social media sites (e.g., Facebook and Twitter). The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your MR Assist account and authorising MR Assist to have access to this information, you agree that MR Assist may collect, store and use this information in accordance with this Privacy Policy.
- 4.5 In order to help protect you from fraud and misuse of your personal information, we may collect information about your use and interaction with our website. For example, we may evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

## 5. **How we protect and store personal information**

- 5.1 We use the term "personal information" to describe information about an individual whose identity is apparent, or can be reasonably be ascertained, from the information. We do not consider personal information to include information that has been de-identified or made anonymous so that it does not identify a specific individual.
- 5.2 We store and process your personal information on the Cloud in Australia.
- 5.3 We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, and information access authorisation controls.

## 6. **How we use the personal information we collect**

- 6.1 Our key purpose in collecting personal information is to provide you with a secure, easy, efficient, and customised experience. We may use your personal information to:
- 6.1.1 provide the services on the MR Assist website and customer support;
  - 6.1.2 resolve disputes, collect fees, and troubleshoot problems;
  - 6.1.3 prevent potentially prohibited or illegal activities, and enforce our User Agreement;
  - 6.1.4 customise, measure, and improve the content, layout, and operation of the MR Assist website;
  - 6.1.5 deliver targeted marketing, service update notices, and promotional offers based on your communication preferences;
  - 6.1.6 contact you in relation to the Licence Agreement; and
  - 6.1.7 compare information for accuracy and verify it with third parties

6.2 Where your personal information is disclosed we will seek to ensure that the information is held, used or disclosed consistently with the Australian Privacy Principles and other applicable privacy laws and codes.

6.3 As we operate throughout Australia, some of these uses and disclosures may occur outside your State or Territory and/or outside Australia. In some circumstances we may need to obtain your consent before this occurs.

## 7. **Consequences of not providing personal information**

Failing to provide MR Assist with certain personal information means that, potentially, we may not be able to provide the relevant service to you.

## 8. **Direct Marketing**

8.1 We may combine your information with information we collect from other companies and use it to improve and personalise MR Assist's website content and advertising.

8.2 We assume that we have consent to use or disclose personal information for the purposes of informing you about the following matters in a business context unless we are told otherwise:

8.2.1 MR Assist's products and services that may be of interest and suit your requirements; and

8.2.2 promotions or other opportunities in which you may be interested

8.3 You can opt out of receiving marketing communications by sending an e-mail to [support@mrassist.com.au](mailto:support@mrassist.com.au).

8.4 We further assume we have consent to use service providers to assist us with marketing (e.g. mailing services or advertising agencies) unless you advise us otherwise.

8.5 We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent.

8.6 We respect your communication preferences. If you no longer wish to receive notifications via our application, you can adjust your preferences by visiting the Profile page of the device.

8.7 We may call or text message (SMS) you at a mobile phone number that you have provided to us.

## 9. **How we share personal information with other parties**

9.1 We may disclose personal information to the following organisations:

9.1.1 outsourced service providers who manage the services we provide (e.g. mailing services, billing and debt recovery functions, marketing services, data analysis specialists, data processing organisations and loyalty program administrators);

9.1.2 Pharmacists and Home Medicines Review ('HMR') providers;

9.1.3 our suppliers;

9.1.4 our business associates and others for purposes directly related to the purpose for which the personal information is collected;

9.1.5 credit reporting agencies;

- 9.1.6 our advisers (including our accountants, auditors and lawyers);
  - 9.1.7 government and regulatory authorities and other organisations, as required or authorised by law;
  - 9.1.8 organisations involved in marketing our products and services;
  - 9.1.9 organisations jointly participating in, or assisting us to manage, a promotion, event, seminar or competition;
  - 9.1.10 organisations involved in a transfer or sale of our assets or business;
  - 9.1.11 organisations involved in managing our corporate risk; and
  - 9.1.12 our related companies.
- 9.2 Please note that these third parties may be in other countries where the laws on processing personal information may be less stringent than in your country. However, we will ensure that we take reasonable steps to ensure the third parties do not breach the Australian Privacy Principles in relation to the personal information.
- 9.3 We will not on-sell your personal health information for profit under any circumstances, although we reserve the right to on-sell de-identified data (that is, data from which it is impossible to ascertain who you are) to persons or organisations who are engaged in research, clinical trials, analyses and like activity including pharmacists, HMR providers, health insurers, pharmaceutical companies and other similar entities.
- 9.4 Where possible, we try to ensure that our disclosure of information to other organisations (for example suppliers) is in a way which does not personally identify individuals.

## 10. **Unsolicited personal information**

We take all reasonable steps to ensure that all unsolicited information is destroyed or de-identified immediately unless it is necessary for one or more of the functions of the MR Assist website or it would be unlawful for MR Assist to destroy it. Unsolicited information is information that we have not requested from you and could not have collected from you.

## 11. **How you can access or change your personal information**

You can review and edit your personal information at any time by logging into your MR Assist account and reviewing your account settings and profile. You can also close your account via contacting MR Assist. If you close your MR Assist account, we will mark your account in our database as "Closed," but may retain personal information from your account to collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce our Licence Agreement, or take other actions as required or permitted by law.

## 12. **Keeping your personal information accurate and up-to-date**

MR Assist intends to make sure that the personal information we collect, use or disclose is accurate, complete and up-to-date. We will take reasonable steps to make sure this is the case so we can provide you with a better service. However, the accuracy of that information largely depends on the quality of the information provided to us. We ask that you let us know if there are any errors in your personal information and keep us up-to-date with changes to your personal information (see 'Contact us' below).

## 13. **Dealing with MR Assist anonymously**

MR Assist permits individuals to not identify themselves when dealing with us, where practicable.

#### 14. **Sensitive Information**

14.1 Without your consent, we do not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation or criminal record. Such information is classified as Sensitive Information.

14.2 We will only collect Sensitive Information where, amongst other exceptions, the collection is required by law, the information is necessary to provide a health service or when the information is necessary for the establishment, exercise or defence of a legal claim.

#### 15. **Accessing personal information**

You have the right to access your personal information, subject to some exceptions allowed by law. Please feel free to contact us with such a request (see 'Contact us' below). We may charge a fee for collating and providing access to personal information.

#### 16. **Complaints**

16.1 If you believe that we have breached your privacy rights in any way or wish to discuss any issues about our Privacy Policy, please contact us by sending an e-mail to [support@mrassist.com.au](mailto:support@mrassist.com.au).

16.2 If we do not satisfactorily answer an individual's concerns, they have the right to make a complaint to the Privacy Commissioner.

#### 17. **Contact Us**

Individuals may ask any questions about privacy and the way we manage personal information or obtain a form requesting access to personal information by sending an e-mail to [support@mrassist.com.au](mailto:support@mrassist.com.au).