

Privacy Policy

In this Privacy Policy, 'us' 'we' or 'our' means Neurotech International Limited ACN 610 205 402 and our related bodies corporate. We are bound by the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**). This Privacy Policy has been drafted in order to comply with the APPs.

Our Privacy Policy sets out how we collect, use, store and disclose your personal information (as that term is defined in the Privacy Act).

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card information.

1. What personal information do we collect?

We may collect the following types of personal information:

- (a) name;
- (b) mailing or street address;
- (c) email address;
- (d) telephone number and other contact details;
- (e) age or date of birth;
- (f) credit card information;
- (g) your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- (h) details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- (i) any additional information relating to you that you provide to us through our website, through your use of our website or through other websites or accounts from which you permit us to collect information;
- (j) information you provide to us through customer surveys; or
- (k) any other personal information that may be required in order to facilitate your dealings with us or which may be reasonably necessary to pursue our functions and activities.

We may collect this personal information either from you, or from third parties. We may collect this information when you:

- (a) register on our website;
- (b) communicate with us through correspondence, chats, email, or when you share information with us from other social applications, services or websites;

- (c) interact with our sites, services, content and advertising; or
- (d) invest in our business or enquire as to a potential purchase of goods or services from our business.

In the course of carrying out recruitment activities, we may collect information regarding an applicant's educational qualifications, career history, interests, hobbies and job interests and such other information as may be routinely included within a curriculum vitae.

From time to time, we collect sensitive information about individuals in order to provide our services. However, we only collect sensitive information if:

- (a) the collection of is reasonably necessary for one or more of our activities or functions; and
- (b) we have the individual's consent to the collection.

The APPs list a number of circumstances that permit the collection of sensitive information about an individual without their consent. We only collect sensitive information without an individual's consent if one or more of those circumstances applies.

2. **Why do we collect, use and disclose personal information?**

We may collect, hold, use and disclose your personal information for the following purposes:

- (a) to enable you to access and use our website, goods or services;
- (b) to operate, protect, improve and optimise our website and services, business and website users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- (c) to send you messages, reminders, notices, updates, security alerts, and information requested by you;
- (d) to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- (e) to comply with our legal obligations, resolve any disputes that we may have with any of our website users, and enforce our agreements with third parties; and
- (f) to consider your employment application.

Generally, we will only use or disclose personal information for the purpose for which it was collected (the primary purpose), including the purposes set out above.

We may use or disclose personal information for secondary purposes if we receive consent or if the APPs otherwise permit us to do so.

We may disclose your personal information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymised consumer insights so that we can better understand your preferences and interests, personalise your experience and enhance the products and services that you receive.

3. Do we use your personal information for direct marketing?

We may send you direct marketing communications and information about our services and or products. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the *Spam Act 2003* (Cth) and the Privacy Act.

We may use or disclose personal information (other than sensitive information) for direct marketing if:

- (a) we collected the information from the individual concerned;
- (b) the individual has consented to, or would reasonably expect us to, use or disclose the information for that purpose; and
- (c) we provide the individual with a simple means by which they may easily request not to receive direct marketing communications from us and they have not made such a request to us. In this regard, you may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (e.g. an unsubscribe link).

From time to time we may need to disclose personal information to third parties. We will only do so for purposes of us carrying out at least one of our functions or activities and we will only do so in a manner that complies with the APPs.

4. To whom do we disclose your personal information?

We may disclose personal information for the purposes described in this privacy policy to:

- (a) our employees and related bodies corporate;
- (b) third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
- (c) professional advisers, dealers and agents;
- (d) payment systems operators;
- (e) our existing or potential agents, business partners or partners;
- (f) anyone to whom our assets or businesses (or any part of them) are transferred;
- (g) specific third parties authorised by you to receive information held by us; and/or
- (h) other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

5. Disclosure of personal information outside Australia

We may disclose personal information outside of Australia to companies located in Malta.

When you provide your personal information to us, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that personal information in compliance with Australian Privacy Law, unless the APPs do not require us to do so.

We will, however, take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

6. **Our website and cookies**

We may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

7. **Security**

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. However, we cannot guarantee the security of your personal information.

8. **Links**

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ from our Privacy Policy, so we encourage you to read them before using those websites.

9. **Anonymity and pseudonymity**

(a) When interacting with us, individuals may choose to remain anonymous or to use a pseudonym. However, we may elect not to deal with the individual anonymously or pseudonymously if:

(i) we are required or authorised by or under an Australian law, or a court/tribunal order, to deal with them in accordance with their identity; or

(ii) it is impracticable for us to deal with them in this way.

(b) In some circumstances, it may not be possible for us to provide a service without the knowledge of an individual's identity.

10. **Accessing or correcting your personal information**

You can access the personal information we hold about you by contacting us.

Upon request of personal information, we will within a reasonable period of the request being made, give access to the information in the manner requested (if it is reasonable and practicable to do so), subject to exceptions set out in the APPs.

Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why and take such steps (if any) that are reasonable in the circumstances to give access in a way that meets our needs and yours. We may also need to verify your identity when you request your personal information. The APPs provide a list of situations in which we may deny individuals access to their personal information.

If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

11. **Making a complaint**

If you think we have breached the Privacy Act or the APPs, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below.

Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

12. **Changes to this policy**

We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

13. **Contact Us**

For further information about our Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

The Company Secretary
Neurotech International Limited
Level 14, 191 St Georges Terrace
PERTH WA 6000

Email: info@neurotechinternational.com

Telephone: +61 8 9424 9360

Effective: 23 August 2016