

Privacy Policy






Macuject Pty Ltd

Contents

1	We're here to help. Get in touch.	2
2	About us	2
3	What information do we collect?	3
4	How do we collect your information?	4
5	How do we use your information?	5
6	How do we use your personal information for direct marketing?	6
7	Do we store or share your information outside of Australia?	6
8	Who do we share your information with?	7
9	Using our website	7
10	How do we protect your information?	7
11	What are your rights in relation to your information?	8
12	Changes to this policy	9
13	Find out more	9

1 We're here to help. Get in touch.

You can get in touch with us at any time about the way we handle and safeguard your information.

If you want to:	
	ask questions
	update your information
	register a concern
	opt out of marketing
	or anything else...
we're just a call or a few clicks away.	

If you have any questions or complaints about how we handle your information you can get in touch with us at:

Email:	privacy@macuject.com
Online:	https://www.macuject.com/contact
Address:	29 Fitzwilliam St, Kew, VIC, 3101, Australia

2 About us

Macuject provides clinical decision support software to ophthalmologists. Our software gives ophthalmologists new insights into treatment solutions for wet macular degeneration, increasing their efficiency and confidence in their treatment decisions. When we provide our service, we may collect personal information from our users (and their patients) enabling us to develop and improve our software and to provide our service to ophthalmologists.

Protecting your privacy and ensuring that you control the way your information is used is our priority.

We want to make sure you are properly informed about the way we handle your information. In this policy we explain the different types of information we collect, how we may collect and use it, who we may share it with, and the rights you have over that information.

We commit to holding ourselves to high standards when handling your information. We are committed to complying with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth).

We mean what we say

In this policy, when we say:

- **we, our, us or Macuject** – we mean Macuject Pty Ltd (ABN 93 614 597 036).
- **our services** – we mean providing clinical decision support software for macular disease.
- **your information** – we mean **your health information** and **your general personal information**, which we describe in section 3.
- **your consent** – we mean your express and informed consent. If you are a patient and your ophthalmologist is using the Macuject software in their clinic, this consent may be provided through your ophthalmologist.
- **ophthalmologist** – we mean a specialist ophthalmologist registered as such under the Health Practitioner National Law in Australia.
- **our business partners** – we mean our third party service providers and other organisations that we partner with to help us deliver our services and manage our website.
- **privacy laws** – we mean relevant privacy and data protection laws that apply to us when we handle your information, including applicable health information laws, the Australian Privacy Principles and the Australian *Privacy Act 1998* (Cth).

3 What information do we collect?

We collect and hold 8 main categories of information, including general personal information, health information, device information, and general information to help us improve our services.

When you access and use our website and services, we may collect and hold 8 main categories of information. These are set out in the table below. If you choose not to provide the information we request from you, we may not be able to provide our services to you (or if you are a patient, your ophthalmologist may not be able to use our services in connection with your treatment).

Category	Details
Your general personal information	This includes information or an opinion about you that is reasonably identifiable. For example: your name, address, age or date of birth, contact number, payment information (to facilitate payments for our services) and email address. This does <u>not</u> include your health information .
Your health information	This includes any reasonably identifiable patient health information that ophthalmologists provide to Macuject (with patient consent) when accessing or using our services.
Device information	This includes 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. This information may also be part of your general personal information .

Category	Details
Product and service details	We may collect 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. This information may also be part of your general personal information .
Additional information you provide	This includes information you provide to us through customer surveys, directly through our website or by contacting us, or indirectly through your use of our website or software. This information may also be part of your general personal information .
De-identified information	<p>We may de-identify your information and use it in aggregate form to conduct analysis on how our services are being used. We do this to improve our services and provide benefits back to our users and customers. We may also provide certain insights generated from such de-identified, aggregated information to our trusted partners, such as other companies who are involved in the treatment of eye disease, for the purposes of research, quality review and better understanding health and treatment patterns. Macuject may receive a commercial benefit for the provision of these insights.</p> <p>When we refer to 'de-identified' information, we mean information that has undergone a process of removing all personal identifiers that can reasonably identify you. We take all reasonable steps to ensure this de-identified information cannot be reverse-engineered, re-identified, or linked back to individuals by third parties.</p>
Information collected by cookies	We may collect de-identified information via cookies on our website, such as the user's browser type, operating systems and other websites visited. We may also collect some personal information when using cookies, such as where a cookie is linked to an account. There are more details about cookies in section 9.
Information collected for recruitment purposes	When you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract.

By providing **your general personal information** or **health information** to us (including by consenting to your ophthalmologist providing such information), you consent to our collection, use and disclosure of your personal information in accordance with this policy and any other arrangements that apply between us.

4 How do we collect your information?

We collect personal information when individuals engage with us directly, from users of our software (such as ophthalmologists) or from third parties in the course of undertaking our business activities.

In many instances, we collect your information directly from you. Here are some of the main ways.

Category	Details
Registration	When you register on our website.
Communication	When you communicate with us through correspondence, chats, email, or when you share information with us from other social applications, services or websites.
Interaction	When you interact with our sites, services, content and advertising or use our products or services.
Investment	When you invest in our business or enquire as to a potential purchase in our business.

If you are a patient and your ophthalmologist is using our software, we will predominately collect information about you from your ophthalmologist. We may also collect information about you from our third-party service providers and other organisations that we partner with.

For example, we may collect information about you when:

- with your consent, your ophthalmologist discloses **your health information** to us while using our software;
- you provide feedback to us on how the software is working;
- you contact us to make an enquiry about our software, how we protect and use your information, or to seek to access or correct your personal information; and
- you apply for a job or position with us, we may collect information about you from any recruitment consultant, your previous employers, referees, CV checking agencies or others who may be able to provide information to assist us with our decision.

5 How do we use your information?

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

Category	Details
Access	Enable you to access and use our website and services.
Improvement	Design, provide, improve and manage our website and services, business and your experience. This includes performing analytics and for advertising and marketing.
Support	Send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you.
Contact	Contact you when we need to tell you something important about our website, software, or your information.
Marketing	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.
Law	Comply with laws, and assist government or law enforcement agencies where we are required and authorised to do so.
Employment	Consider your employment application.

We may deal with your personal information in accordance with the general permitted situations and permitted health situations under the Privacy Act from time to time (such as to lessen or prevent a serious threat to the life, health or safety of an individual if we are required to do so). It is part of our service promise and commitment to transparency that we don't otherwise use **your health information** for any purpose without first seeking the necessary consent to use it in that way.

If we ever want to use **your health information** for a new or different purpose, we will first notify and obtain consent from the individual whose health information we may want to use. Even once you have provided consent for a particular use of **your health information**, you can withdraw it at any time, and we will regularly check with users and ophthalmologists to ensure consents remain current.

We always handle **your health information** in accordance with applicable legal requirements.

Before you provide your consent, you should also know that we may from time to time need to respond to legal requests for information requiring disclosure by Macuject as a matter of law (as any company does).

6 How do we use your personal information for direct marketing?

We may use your information for direct marketing purposes, but you can opt-out at any time. We will not use your health information for direct marketing purposes without your consent.

If you have registered on our website or have contacted us directly, we may send you direct marketing communications and information about our service or about our business partners' products and services. This may take the form of emails, SMS, mail or other forms of communication. We'll always conduct our marketing practices in accordance with privacy laws and other applicable laws.

If you are a patient and your ophthalmologist is using our services, we will never (without your consent) send you (or allow a business partner to send you) marketing communications using your health information.

If you do expressly consent to us sending you marketing messages using your personal information, you'll be able to opt out at any time – either by using the unsubscribe facility in the relevant message or by contacting us (it's easy – see section 1).

We may also market our services to you generally – including via social media, advertising through our website or through third party websites and other digital or non-digital platforms. We'll always do this in accordance with our legal requirements and only with our trusted partners.

Without your consent, we will not:

- use any of **your health information** to send you direct marketing communications; or
- disclose any of **your health information** to a third party in order for them to direct market to you.

7 Do we store or share your information outside of Australia?

Your information is stored in Australia.

We store all of your information in Australia, and in accordance with all applicable laws. Macuject does not currently disclose your information to any overseas recipient.

8 Who do we share your information with?

We may share your personal information with our trusted partners and for the other reasons we tell you about in this policy.

We may share **your health information** or your general personal information with:

- our employees;
- third party software developers;
- our professional advisers;
- specific third parties authorised by you to receive this information held by us;
- anyone to whom our assets or businesses (or any part of them) are transferred; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

We may also share your general personal information with:

- third party suppliers and service providers (including providers that help us deliver our services and operate our website);
- payment systems operators (e.g., merchants receiving card payments); and/or
- our existing or potential agents, business partners or partners.

9 Using our website

We may use cookies on our website to track your website usage and remember your preferences.

Our website may include pages that use cookies which are small files that store information on your computer, mobile phone or other device. We may use them to recognise you across devices and browsing sessions. We may also use third party analytics tools to help us gather and analyse this information.

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. If you refuse the use of cookies in this way you may not be able to access the full functionality of our website. Please refer to your internet browser's instructions or help screens to learn more about these functions.

Our website may contain links to websites operated by third parties. Those links are provided for your convenience and may not remain current or be maintained. We have no control over, and are not responsible for, any content or privacy practices of those linked websites. As the privacy policies that apply to those other websites may differ substantially from ours, we encourage you to read them before using those websites.

10 How do we protect your information?

We take numerous appropriate measures to keep your information safe.

We generally hold your information in our electronic databases and in third party databases and platforms. We may in some cases store your information in hard copy form, for instance if you have written to us via mail.

Our website and our working environment are built with integrated physical, electronic and managerial processes designed to safeguard your information and protect it from misuse, interference, loss and unauthorised access, modification or disclosure.

Here are some of the key things we do to protect your information.

Category	Details
Staff training	We put our staff through training about how to keep your information safe and secure at all times.
Secure storage and handling	We use a combination of techniques and measures to maintain the security of our website and to protect your account and your information.
Destroying or de-identifying your information	We only keep your information for as long as we need it or are lawfully required to keep it. Once this time expires, we will destroy or de-identify your information.

11 What are your rights in relation to your information?

You have rights in relation to your personal information under privacy laws.

Here are the things you can ask us to do in relation to your information at any time while you use our website or services.

Category	Details
Access	You can request a copy of your information.
Correct	You can ask us to correct or update your information.
Complain	You can express your concerns or complaints to us about your privacy or the way we are handling your information. We take your concerns seriously and will seek to fix any problem as soon as possible.

Where we are not able to fulfil your request to access, correct or delete **your general personal information** or **your health information** for a legal or other reason, we will let you know why. We may also need to verify your identity when you request your information.

If you're not happy with the way we handle your query or handle your information (including our response to your request to access, correct or delete **your general personal information** or **your health information**), you have a right to lodge a complaint with the Office of the Australian Information Commissioner by visiting their website.

Upon your request, we will take reasonable steps to provide you a copy of this Privacy Policy in a particular form. If we cannot fulfil your request, we will let you know why.

To exercise any of your rights in relation to your information, you can contact us (it's easy – see section 1).

12 Changes to this policy

If we need to change this policy in a way that affects the way we handle your information, we will publish the 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 Find out more

You can find out more about the various privacy laws and other rules, regulations and standards we've mentioned in this policy by visiting the website of the Office of the Australian Information Commissioner (**OAIC**).



OAIC

- OAIC home: <https://www.oaic.gov.au/>
- Contact and complaints: <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

Effective: 15th December 2020