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## **Privacy Policy**

**Invion Limited**

**ACN 094 730 417**

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# 1 Introduction

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## 1.1 Purpose

Invion recognises the importance of privacy and is committed to protecting your privacy when handling your personal information. This Privacy Policy describes how Invion Limited collects, uses, discloses and stores personal information collected through our Websites, and what choices you have with respect to that information.

We take the privacy and security of your information very seriously and we are committed to ensuring that we collect, use, disclose and store your information in accordance with applicable data protection and privacy laws worldwide.

## 1.2 What information do we collect?

Invion may collect the following types of personal information from you through your use of Websites:

- Contact details: including your name, address, telephone numbers, email addresses and social media handlers/username.
- Demographic information: such as gender, citizenship, date of birth.
- Personal data in reports you submit to us: if you submit information about our products and services through our Websites (for example, through a suspected adverse event reporting form), we will collect any personal data you include within your report.
- Health data: for example, if you submit healthcare data to us in relation to our products or services, we will collect any personal data and sensitive personal data you include.
- Employment information: if you apply for a job vacancy with us, we will collect information such as your employment history, references and anything else you may include in the job application form or in any attachments such as CVs.
- Records of your discussions with us: when you contact us using the contact options on the Websites (whether by email, phone, an online form or through social media (such as through Twitter or on Facebook), we may keep a record of the information you provide when doing this.
- How you use our Websites: we may collect information about the pages you look at and how you use them through the use of Cookies (see below).
- Location information: your smartphone or computer's IP address may tell us your approximate location when you connect to our Websites.

Please note this Privacy Policy only governs information collected through our Websites.

Invion also collects information by other means, including through our conduct of clinical trials. If you are participating in a clinical trial sponsored by Invion, you will be informed of your rights with respect to personal information collected in the conduct of the clinical trial prior to your participation in the trial, and this Privacy Policy does not apply to personal information collected as part of any clinical trial.

The Group collects personal information so that it can administer your investment in the Company, provide facilities and services that you request and comply with its legal

obligations. If the Company or Group does not collect your personal information, it may not be able to provide you with these services.

### **1.3 How does Invion use my information?**

Invion may collect the following types of personal information from you through your use of Websites only as required to conduct our business and pursue our legitimate business interests, by:

- Communicating with you in relation to our business, products and services;
- Fulfilling a contract we may have with you, such as where you have made a purchase from us;
- Administering and keeping our Websites secure;
- Sending you relevant direct marketing (such as newsletter updates), either where you have consented or where we do not need your consent;
- Allowing you to participate in interactive features of our websites;
- Enabling you to report serious adverse events in relation to our products;
- Enabling you to apply for jobs or other opportunities at Invion;
- Responding to any comments or complaints you send us;
- In connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation); and
- Making suggestions and recommendations to you and other Users about products that may be of interest to you or them.

Other than as set out above, we will not use your information unless we have your consent or otherwise permitted by law. If you receive electronic communications from us, we will always provide you with an opportunity to unsubscribe from receiving further information from us by clicking on the unsubscribe link provided in the communication.

If information is aggregated or de-identified so it is no longer reasonably associated with an identifier or identifiable natural person, it is no longer considered personal information and Invion may use or disclose such information for any purposes.

### **1.4 Disclosure of information**

Invion will never disclose your personal information to third party marketing or advertising businesses or sell or trade your personal information with third parties.

There are however, some occasions where Invion may be required to disclose your personal information to a third party in order to operate our business. These times are limited, but may include:

- Suppliers and agents: Invion may engage other businesses, certain services and individuals to perform functions on our behalf. Examples include payment servers, wireless carriers, systems analysis providers, and data storage providers. They may have access to some personally identifiable information needed to perform their functions;

- Company reorganisation: to a third party in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- Where necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our related bodies corporate; (f) to protect our rights, privacy, safety or property, and/or that of our related bodies corporate, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

## 1.5 How do we protect your information?

Invision takes all reasonable steps to ensure the security of our system and to protect your information from misuse, interference and loss as well as unauthorised access, modification or disclosure. Invision Limits access to personal information by our employees and service providers. Any employee or service provider who does have access to your personal information is under an obligation to keep such information confidential.

Your information is stored on high security servers. Where we use a data storage partner, we will make that selection based primarily on their level of security, reliability and experience in the storage and treatment of data, including personal information.

In the event of a data breach, Invision is committed to complying in all respects with the requirements of all relevant privacy laws, including, where required, the provisions of the Australian Privacy Law and European GDPR.

The transmission of information via the internet is not completely secure. Invision cannot guarantee the security of personal information transmitted; and any transmission to our Websites is at your own risk.

## 1.6 International Data Transfers

Invision may transfer your personal information to countries other than the one in which you live. Personal information collected by Invision is stored in servers located in Australia.

If Invision transfers personal information originating from the European Union (the EU) to countries outside the EU it will only do so in accordance with the EU's General Data Protection Regulation (the GDPR). The GDPR requires that one of the following conditions applies to such transfer:

- The European Commission has decided that the country provides an adequate level of protection for your personal data (in accordance with Article 45 of the GDPR);
- The transfer is subject to a legally binding and enforceable commitment on the recipient to protect the personal data (in accordance with Article 46 of the GDPR);
- The transfer is made subject to binding corporate rules (in accordance with Article 47 of the GDPR); or
- The transfer is based on a derogation from the GDPR restrictions on transferring personal data outside of the EU (in accordance with Article 49).

Invion also ensures that any third party it uses to store or process information (generally referred to as 'data controllers' under the GDPR) is compliant with GDPR and where necessary, will seek evidence of compliance with the Standard Contractual Clauses from each data processor it uses.

## 1.7 Your rights

In certain circumstances you have the right to:

- ask us for a copy of the personal information we hold about you;
- ask us to correct, delete or restrict processing of your Personal Information;
- ask us to transmit your data to another party;
- object to the processing of your Personal Information in certain circumstances (in particular, where we don't have to process the information to meet a contractual or other legal requirement, or where we are using the information for direct marketing or profiling)

To exercise any of these rights, please get in touch with us using the details set out below.

If you have a complaint related to how the Group has managed your personal information, please contact the Group using the contact information below. The Group may ask you to place your concerns in writing in order for it to fully understand and investigate the issues you have raised. We will endeavour to respond to your request within 30 days. All such complaints will be handled with the appropriate discretion.

If a complaint remains unresolved, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner (OAIC) at [www.oaic.gov.au](http://www.oaic.gov.au) to have the complaint heard and determined.

Further information on the Act and the Australian Privacy Principles, can be found [www.privacy.gov.au](http://www.privacy.gov.au).

## 1.8 Data Retention

Generally, Invion will retain your personal information until you ask us to delete such information.

If you ask to delete your personal information at any time, be aware that Invion cannot guarantee that it will be able to delete such information from back-ups or caches of our databases due to the complexity of such a process, however we will ensure that we do not actively access such data.

## 1.9 Do we use cookies?

Yes (Cookies are small files that a site or its service provider transfers to your computers hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognise your browser and capture and remember certain information. We use cookies to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

## 1.10 Your Consent

By using our Websites, you consent to our privacy policy.

### **1.11 Changes to our Privacy Policy**

If we decide to change our privacy policy, we will post those changes on this page. If we make changes that materially alter your privacy rights, Invion will provide additional notice, typically via email.

#### Contacting Us

If there are any questions regarding this privacy policy, if you wish to complain about how the Group handled personal information about you or if you wish to access or correct your personal information, please contact the Company Secretary on:

Tel: +61 9692 7222

Email: [investor@inviongroup.com](mailto:investor@inviongroup.com)

Mail: Invion Limited

Level 4, 100 Albert Road

South Melbourne, VIC 3205

### **1.12 Approved and Adopted**

This policy was approved and adopted on 4 August 2021.