

PRIVACY POLICY

Diabeasy Pty Ltd ACN 638 054 832 (“us”, “we” and “our”) is in the business of providing cloud-based software to medical clinics, medical practitioners and other medical services provider businesses that consult, treat and manage patients with Type 1 diabetes.

We are committed to protecting personal information in accordance with our obligations under the *Privacy Act 1988* (Cth) (“**Privacy Act**”), the Australian Privacy Principles (“**APPs**”) in the Privacy Act, and other applicable State and Territory privacy and data legislation (“**Privacy Obligations**”).

This policy (“**Privacy Policy**”) outlines how and why we may collect, hold, use, disclose and otherwise handle personal information (which includes sensitive information and health information) of individuals including, but not limited to, individuals in the following categories (“**you**” and “**your**”):

1. directors, officers and employees (“**Medical Staff**”) of medical clinics who are customers or potential customers for our products and / or services (“**Medical Clinics**”);
2. medical practitioners practicing at or associated with Medical Clinics and medical practitioners who are customers of our products and / or services (“**Medical Practitioners**”); and
3. current or potential patients of Medical Clinics and / or Medical Practitioners (“**Patients**”) with any form of diabetes mellitus.

This Privacy Policy also applies to any personal information which we collect through our website, <https://www.diabeasy.com.au/> (“**Website**”).

By providing your personal information or accessing our Website, you consent to the handling of your personal information in accordance with this Privacy Policy.

WHAT IS PERSONAL INFORMATION?

Personal information is any information or an opinion, in any form and whether true or not, about an identified or reasonably identifiable individual.

Sensitive information (including health information) is a type of personal information which is subject to special provisions requiring a higher level of protection than other personal information. Sensitive information is any personal information about your racial or ethnic origin, political opinions or associations, religious or philosophical beliefs, trade union membership or associations, sexual orientations or practices, criminal record and / or health or genetic information. Health information is a type of sensitive information and includes any information or opinion about an individual’s health or disability, health services an individual has received or will receive, wishes for future health services, medical reports or test results, prescriptions or other pharmaceutical purchases and / or genetic information. While we do not directly solicit sensitive information or health information, any sensitive information or health information provided to us will be dealt with by us in accordance with our Privacy Obligations.

HOW DO WE COLLECT PERSONAL INFORMATION?

We may collect your personal information either directly or indirectly, whether or not we have specifically requested that personal information.

We may collect your personal information directly including when you:

- make an enquiry with us, or communicate or otherwise deal with us in-person, in writing, by telephone or online (including by email, social media or our Website); and / or
- use or receive our products or services (including our Website); and / or

- otherwise interact with us in the course of our business.

We may collect your personal information indirectly including when:

- that information is within the public domain; and / or
- for Medical Staff and Medical Practitioners, your Medical Clinic (where you are employed, practicing or otherwise engaged with) provides us with your personal information as may be reasonably necessary in the course of your Medical Clinic enquiring about, using or receiving our products or services; and / or
- for Patients, your treating Medical Clinic or Medical Practitioner provides us with your personal information as may be reasonably necessary in the course of your Medical Clinic or Medical Practitioner using or receiving our products or services in accordance with the terms of the Software as a Service (SaaS) Agreement between us and your treating Medical Clinic or Medical Practitioner.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We collect and hold personal information that is reasonably necessary for us to carry out our business and / or you have consented to our collection of that personal information and / or we are required or authorised by law to collect that information. The type of personal information that we collect and hold may vary depending on the category to which the individual belongs.

For Medical Staff or Medical Practitioners, we may directly or indirectly collect and hold personal information about you that includes, but is not limited to, the following examples:

- **Personal details** such as name, Medical Clinic, position; and / or
- **Contact information** such as mailing or street addresses, email addresses and telephone numbers; and / or
- **Financial information** such as bank or credit card information or other information required for you or your Medical Clinic to transact with us; and / or
- **Browsing information** such as browser session and geo-location data, device and network information (including IP addresses and domain names), statistics on page views and sessions, acquisition sources, search queries, browsing behaviour, type of browser, type of operating system; and / or
- **Other information** such as details of the products or services we provide you, that you use or that you have enquired about, any additional information necessary to deliver those products or services and respond to your enquiries, information you provide us about your experiences with and feedback about our products or services and other information you provide us through your interactions with us, our business or our Website.

For Patients, we may indirectly collect and hold personal information about you that includes, but is not limited to, the following examples:

- **Personal details** such as name, age, date of birth, gender, nationality, patient ID, schooling or education information, occupation, relationship status, names and contact details of spouses, children and parents or guardians and insurance information; and / or
- **Diagnosis information** such as type of diabetes, date of diagnosis, symptoms, test results and other relevant medical conditions or diagnoses; and / or
- **Consultation information** such as date of consultation, delivery method (such as in-person or telehealth), height, weight, BMI, medical team attendees (such as Medical Practitioner,

diabetes educator, social worker, dietician, mental health professional, exercise physiologist, podiatrist), other attendees (such as Patient, parent, guardian) and test results; and / or

- **Medication management information** such as type, delivery method and dosage of insulin, blood glucose and carbohydrate entries, continuous glucose monitor usage and metrics; and / or
- **Evaluation information** such as physical and mental health assessments, school and parent/carer support assessments, glycaemic patterns, food bolus actions, recommended actions and future consultation dates.

(together, “**Patient Data**”)

WHY DO WE COLLECT, HOLD AND USE PERSONAL INFORMATION?

We collect, hold and use personal information for the purposes of carrying out our functions and activities in providing our products and services, maintaining and improving our Website, complying with our legal obligations and such secondary purposes permitted by the Privacy Act.

We may collect, hold and use your personal information for the following purposes and such secondary purposes permitted by the Privacy Act (each a “**Permitted Purpose**”), including:

- to prepare sales proposals and contracts for products or services we may provide you; and / or
- to enable you to access and use our Website; and / or
- to operate, protect, improve and optimise our Website and its users’ experience; and / or
- to verify your identity; and / or
- to provide our products and services to you; and / or
- to respond to your communications, engage with you for the provision of products and services and manage the provision of our products and services to you; and / or
- to create and administer online accounts in your name to enable you to access our online products and services; and / or
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts and other information requested by you; and / or
- to prepare and issue tax invoices and receipts to you; and / or
- to receive payments and recover debts; and / or
- to measure and improve our products and services and the features on our Website to provide you with the best service experience; and / or
- to offer you products and services we believe may interest you (unless you tell us not to and / or opt-out of receiving electronic marketing communications from us by following the instructions provided in the communication); and / or
- to comply with our legal and regulatory obligations, resolve any complaints or disputes that we may have with any of our users and enforce our agreements with third-parties.

If an additional purpose for collection of your personal information arises, we will disclose this at the time of collecting that information.

HOW DO WE USE 'COOKIES'?

We may use 'cookies' or other similar tracking technologies on our Website that help us to track your use of our Website and remember your preferences. Cookies are small files that store information on your computer, 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.

We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information in accordance with this Privacy Policy.

HOW DO WE STORE AND SECURE PERSONAL INFORMATION?

We use industry-standard security measures and other reasonable steps to safeguard the personal information we hold against misuse, interference, loss and unauthorised access, destruction, modification and disclosure, and to comply with our Privacy Obligations.

The personal information we hold in digital format is stored within Australia on infrastructure owned or managed either by us or by reputable third-party service providers, such as cloud storage vendors. Where we use a third-party service provider, we take reasonable steps to ensure that they comply with the Privacy Act and any other applicable privacy and data legislation. Personal information is encrypted both during transfer and while at rest and is routinely backed-up.

The Patient Data we hold is accessible exclusively by that Patient's treating Medical Practitioners and other Medical Practitioners practicing at or associated with that treating Medical Practitioner's Medical Clinic and remains anonymised and de-identified except when accessed by those Medical Practitioners and / or Medical Clinics.

Notwithstanding the reasonable steps taken to keep personal information secure, security cannot be guaranteed, and data breaches may occur. Should we become aware of any breach to our security systems that is likely to place your personal information at risk, we will notify you and any authority as required to comply with our Privacy Obligations. If you suspect any misuse or unauthorised access to your personal information, please let us know immediately.

We are not liable for any claim arising out of a third-party's use of your personal information where we were authorised to provide that third-party the personal information under this Privacy Policy.

We retain personal information only for the period necessary to achieve the purposes for which it was collected, including any secondary purposes permitted under the APPs, or for a longer period if required to meet our legal or regulatory obligations. We take reasonable steps to de-identify and / or destroy personal information that we no longer require.

HOW DO WE USE AND DISCLOSE PERSONAL INFORMATION?

We will not use or disclose your personal information other than with your permission or as otherwise outlined in this Privacy Policy. For a Permitted Purpose, we may disclose personal information (including anonymised and de-identified Patient Data) to:

- our customers (and their staff) that access personal information about you when using our software; and / or
- our employees and related bodies corporate; and / or
- our existing or potential legal and other professional advisers, business partners and agents; and / or
- our payment systems operators; and / or

- anyone to whom our assets or businesses (or any part of them) are sold or otherwise transferred; and / or
- certain third-party service providers for the purposes of enabling them to provide their services to us or on our behalf as necessary to carry out our business in providing our products or services, including, but not limited to, IT service providers, data storage providers, web-hosting and server providers, email marketing providers, website or software developers, marketing or advertising providers, payment systems operators; and / or
- other parties, including government agencies, regulatory bodies and law enforcement agencies as required, authorised or permitted by law.

Medical Clinics and Medical Practitioners may use our products or services to generate summary documents relating to a Patient's Patient Data and / or consultations held between that Medical Clinic or Medical Practitioner and a Patient. Such summary documents are intended for use by Medical Clinics and Medical Practitioners in their providing medical services to Patients and, in some cases, may be disclosed to third-parties, for example, when referring the Patient to another healthcare provider or arranging diagnostic tests on the Patient's behalf. Such uses and disclosures are the responsibility of and managed by the Medical Clinic or Medical Practitioner and are subject to the privacy policy of the Medical Clinic or Medical Practitioner, rather than this Privacy Policy.

With the Patient's consent, we may, on request by a Medical Clinic or Medical Practitioner, use anonymised and de-identified Patient Data to create aggregated data summaries and reports ("**Data Reports**") for use by the requesting Medical Clinic or Medical Practitioner. Data Reports may be used by Medical Clinics or Medical Practitioners for purposes, including, but not limited to, improving their services, quality assurance, conducting audits or benchmarking and, in some cases, may be disclosed to third-party auditing, benchmarking or research databases or initiatives which may be located in Australia or overseas. Such uses and disclosures are the responsibility of and managed by the Medical Clinic or Medical Practitioner and are subject to the privacy policy of the Medical Clinic or Medical Practitioner, rather than this Privacy Policy. To ensure the privacy and anonymity of Patients, we do not create or disclose Data Reports in an identifiable or non-aggregated form.

DO WE SEND YOUR PERSONAL INFORMATION OVERSEAS?

We are not likely to disclose your personal information directly to overseas recipients; however, we may use third-party service providers who may store or process your information via cloud-based servers located outside Australia, including but not limited to North America and Germany.

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 the APPs.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You may request access to, or correction of, the personal information that we hold about you by contacting us at the contact details below. There are some circumstances in which we are not required to or may not be able to give you access to all or part of your personal information. Where this is the case, we will tell you why.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material). We may also need to verify your identity when you request your personal information.

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date, complete, relevant and not misleading.

THIRD-PARTY WEBSITES

Our Website may contain links to websites operated by third-parties. Such links are provided for your convenience and may not be current or be maintained.

Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked third-party websites and have no control over or rights in those linked websites.

The privacy policies of these third-parties may differ substantially from this Privacy Policy, so we encourage you to read them before using those websites.

CHANGES TO THIS PRIVACY POLICY

From time to time, we may change or amend this Privacy Policy. Any changes will be published on our Website. You may obtain a copy of our current policy from our Website or by contacting us at the contact details below.

COMPLAINTS

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us at the contact details below. Please include your name, email address and / or telephone number and clearly describe your complaint. We will consider and respond to your complaint within a reasonable period of time.

In considering your complaint, we will determine whether it requires further investigation. We will notify you of the outcome of any investigation and any subsequent internal investigation.

If you remain unsatisfied with our response and / or the way in which we have handled a privacy issue, you may approach an independent adviser and / or contact the Office of the Australian Information Commissioner (“**OAIC**”) (www.oaic.gov.au) for guidance on alternative courses of action that may be available, including lodging a complaint with the OAIC.

CONTACT DETAILS

If you have any questions, comments, requests or concerns, please contact us at:

tom@diabeasy.com.au

EFFECTIVE DATE

4/4/26