

# 3D Medical Group Privacy Policy

The 3D Medical Group is a group of related organisations that provide a range of medical and healthcare specific technology solutions including:

- 3D printing of patient specific anatomical parts and implants;
- the "Medidata" service which provides medical practices the opportunity to analyse patient data and the characteristics of the patients which drive their business;
- the "GestSure" system which allows the user to access, control, orientate and manipulate medical images in theatre;
- the "EchoPixel" which is an interactive virtual reality technology that enables clinicians to uniquely visualise and interact with image data depicting tissue and organs as if they were real objects; and
- the "Mach7 Enterprise Imaging Platform" which enables ownership, sharing and access to medical imaging data.

The 3D Medical Group recognises the importance of your privacy and understands that the security of your personal information is important to you. We are committed to protecting the personal information you provide to us.

This Privacy Policy explains how the 3D Medical Group manages the personal information that we collect, hold, use and disclose and how to contact us if you have any further queries about our management of your personal information. This Privacy Policy applies to you only to the extent that the collection and handling of your personal information by the 3D Medical Group is subject to the *Privacy Act 1988 (Cth)* (**Privacy Act**).

## The 3D Medical Group

This Privacy Policy applies to the following 3D Medical Group companies:

- 3D Medical Limited (ACN 007 817 192); and
- ThreeD Medical Limited (ACN 166 963 864),

(the **3D Medical Group**).

## Background

Where the collection or handling of your personal information by the 3D Medical Group is subject to the Privacy Act, the 3D Medical Group must comply with the requirements of that Act. The Privacy Act regulates the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal.

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Special provisions apply to the collection of personal information which is sensitive information. This includes health information and information about a person's race, ethnic origin, political opinions, membership of political, professional or trade associations, religious or philosophical beliefs, sexual preferences and criminal history.

In this Privacy Policy, all references to personal information include sensitive information unless indicated otherwise.

## What personal information does the 3D Medical Group collect?

In the course of our business, the 3D Medical Group may collect personal information about you that is necessary for us to perform our functions and activities. The 3D Medical Group will only collect personal information about you by lawful and fair means and not in an unreasonably intrusive manner.

The types of personal information we may collect and hold may vary depending on the nature of our interaction with you and may include:

- identifying and contact information (such as name, age, address and telephone phone number);
- credit card and payment details;
- Commonwealth identifiers (such as Medicare numbers); and
- health and claims information (such as information about your health condition and images of diagnostic scans).

The 3D Medical Group may collect personal information about:

- patients and healthcare professionals in the course of providing medical and healthcare specific technology solutions to its customers (such as diagnostic imaging providers);
- third parties providing a service to the 3D Medical Group;
- the shareholders of 3D Medical Limited; and
- employees and contractors of the 3D Medical Group.

### **How does the 3D Medical Group collect personal information?**

The 3D Medical Group may collect your personal information in a number of ways including through application forms, job orders and correspondence (written and verbal).

If you are a patient, the 3D Medical Group typically collects your personal information from your treating healthcare professionals through requests made by your treating healthcare professionals to us to provide healthcare technology solutions with respect to your medical data such as 3D printing.

If you are a healthcare professional, the 3D Medical Group typically collects your personal information directly from you or from the healthcare organisation that you work for or with through requests to us to provide healthcare technology solutions.

If you are an employee, the 3D Medical Group may collect your personal information directly from you or from third parties such as recruitment agencies.

### **For what purposes does the 3D Medical Group collect, hold, use and disclose your personal information?**

The Privacy Act generally requires the 3D Medical Group to use personal information only for the primary purpose for which it is collected, or for secondary purposes which are related (or directly related in the case of sensitive information) to the primary purpose.

In general, the 3D Medical Group collects, holds, uses and discloses personal information for the following purposes:

- to provide medical and healthcare technology solutions to customers (such as diagnostic imaging providers), healthcare professionals and patients;
- to invoice and process any fees payable in relation to the products and services rendered;
- to manage our relationship with you (including if you are a healthcare organisation, healthcare professional, patient, service provider, shareholder or employee) and to contact you for follow up purposes;
- to verify and update personal information held by us;
- to recruit personnel;
- to review, develop and improve our products and services;
- to comply with legal or regulatory obligations; and
- for other purposes required or authorised by or under law, including purposes for which you have provided your express or implied consent.

Our range of products and services and our functions and activities may change from time to time.

If you provide your email address, telephone and/or mobile phone number, you also consent to the 3D Medical Group using your email address, telephone and/or mobile phone number to contact you (including by telephone call, SMS or email) for any of the above purposes.

## **To whom may the 3D Medical Group disclose your personal information?**

In order to carry out the above purposes, the 3D Medical Group may disclose your personal information to:

- customers (such as diagnostic imaging providers), treating healthcare professionals and healthcare organisations so that they can manage their patient's health condition;
- other persons or organisations engaged by the 3D Medical Group to assist the 3D Medical Group in carrying out the above purposes such as 3D medical imaging printers, 3D medical data translators, data storage providers, IT support providers, electronic communication facilitators, recruitment agencies and professional advisors;
- private health insurers and government authorities such as Medicare Australia in order to facilitate payment for services rendered by us; and
- parties involved in a prospective or actual transfer of our assets or business.

In addition, members of the 3D Medical Group may share your personal information with each other so that the 3D Medical Group may adopt an integrated approach, provide better service and ensure seamless business operations for those with whom it interacts. As mentioned above, members of the 3D Medical Group may use this personal information for any of the purposes mentioned under the heading "For what purposes does the 3D Medical Group collect, hold, use and disclose your personal information?"

## **What happens if you don't provide the 3D Medical Group with your personal information?**

If you do not provide personal information requested of you to the 3D Medical Group, depending on the circumstances, we may be unable to provide the products and services you or others request of us. In certain circumstances, we may be able to provide some products and services anonymously.

## **How does the 3D Medical Group hold your personal information and manage the data quality and security of your personal information?**

The 3D Medical Group stores personal information in Australia in a password protected file on the 3D Medical Group's network which is backed up on a weekly basis to an external disk in a secure location off site.

In addition to the above, the 3D Medical Group stores medical imaging data using an external cloud based service provider with data centres in the USA. The 3D Medical Group de-identifies all data that is transmitted to the data centres and uses secure SSL socket level encryption. Access to this data is password-protected and utilises role-based security. A user must be invited to access the data by the 3D Medical Group before gaining access. Access is also restricted to specific locations.

To the extent required by the Privacy Act, the 3D Medical Group will take reasonable steps to:

- make sure that the personal information that we collect, hold, use and disclose is accurate, complete and up to date; and
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure.

The 3D Medical Group will take reasonable steps to ensure that personal information that is held which is no longer required, including under any contractual or legal requirement, is destroyed or de-identified in a secure manner.

## **Does the 3D Medical Group transfer personal information overseas?**

The 3D Medical Group may disclose your personal information to service providers located overseas including electronic communication facilitators located in the USA.

If the 3D Medical Group transfers your personal information to another party outside Australia, we will take such steps as are reasonable in the circumstances to ensure that the overseas recipient will not breach the privacy principles set out in the Privacy Act in relation to the information.

The 3D Medical Group may also disclose de-identified information about you to overseas service providers such as 3D medical imaging printers and 3D medical data translators. In addition, as discussed above, the 3D Medical Group stores de-identified medical imaging data using an external cloud based service provider

with data centres in the USA.

## **Marketing**

A member of the 3D Medical Group may use your personal information to contact you (including by telephone call, SMS or email) in relation to products, services or other offers we think may be of interest to you. This may include the products, services and other offers of:

- that 3D Medical Group member;
- another member of the 3D Medical Group; or
- third parties.

You may opt-out of receiving marketing information from the 3D Medical Group, or a specific member of the 3D Medical Group, at any time by contacting us using the contact details which appear immediately below under the heading "How can you access or correct your personal information and contact the 3D Medical Group?".

### **How can you access or correct your personal information and contact the 3D Medical Group?**

Please contact us if you would like to seek access to or request that we correct the personal information we hold about you:

- By mail: Company Secretary, 3D Medical Limited, PO Box 216, Port Melbourne, Victoria, 3207
- By telephone: +61 3 9646 2222
- By email: [privacyofficer@3dmedical.com.au](mailto:privacyofficer@3dmedical.com.au)

The 3D Medical Group will generally provide you with access to your personal information if practicable, and will take reasonable steps to amend any personal information about you which is inaccurate or out of date. In some circumstances and in accordance with the Privacy Act, the 3D Medical Group may not permit you access to your personal information, or may refuse to correct your personal information, in which case we will provide you reasons for this decision.

### **How the 3D Medical Group handles complaints**

If you have any concerns or complaints about the manner in which your personal information has been collected or handled by the 3D Medical Group, please advise us of your concern or complaint in writing and send it to the Company Secretary using the mailing address set out above. Your concern or complaint will be considered or investigated and we will endeavour to respond to your complaint within 14 days.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction. However, if you are unhappy with our response, you may contact the Office of the Australian Information Commissioner who may investigate your complaint further.

### **Further information**

Further information about the application of the Privacy Act can be found at the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

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

This Privacy Policy is effective from 12<sup>th</sup> May 2015. As this Privacy Policy is updated from time to time, to obtain a copy of the latest version at any time, you should visit our website at [www.3dmedical.com.au](http://www.3dmedical.com.au) or contact the Company Secretary as above.