

## MEDIBETTER – PRIVACY POLICY

Pate Ventures Pty Ltd trading as MediBetter (ABN 33 665 806 182) (**we, us or our**), is an Australian-founded and owned company dedicated to improving the financial viability and sustainability of General Practice. MediBetter's AI-powered Medicare Benefits Schedule (MBS) solutions are designed to simplify and streamline billing processes for clinicians and their clinics by offering potential billing opportunities and guidance regarding compliance requirements. We may collect information about different individuals as set out in this Privacy Policy, including if you are a client using our software, through the General Practice, or as a patient of one of our clients. We provide further information about how and why we collect this data below.

We understand that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or collected by us, when interacting with you.

### The information we collect

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

The types of personal information we may collect about you include:

Where you are our client, an employee of a General Practice, or a General Practitioner:

- **Identity Data** including your name, age, professional association and membership, photographic identification, and gender.
- **Contact Data** including your telephone number, address and email.
- **Financial Data** including bank account and payment card details (through our third-party payment processor, who stores such information and we do not have access to that information).
- **Background Verification Data** including your government-issued identification details such as your Australian Health Practitioner Regulation Agency (AHPRA) identification number requested as part of our process to comply with our due diligence obligations, anti-money laundering laws and related ongoing monitoring commitments.
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** when you access any of our websites or platforms, details about your internet protocol (IP) address, login data, browser session and geo-location data, statistics on page views and sessions, device and network information, acquisition sources, search queries and/or browsing behaviour, access and use of our website (including through the use of Internet cookies or analytics), and communications with our website.
- **Profile Data** including your username and password for our software and support requests you have made.
- **Interaction Data** including information you provide to us when you participate in any interactive features, including surveys, contests, promotions, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience, the types of services you provide, or whether you and or your clinic/workplace hold required certain authorisations or licences.

Where you are a patient of our client, General Practitioners or General Practices and we are provided with your personal information by our client:

- a copy of or access to patient consultation notes relating to you including appointment information, health status, symptoms, diagnosis, prescriptions, treatments; and
- a copy of or access to your name, date of birth, gender, contact information and Medicare information contained in any medical records related to you.

### How we collect personal information

We collect personal information in a variety of ways, including:

- when you provide it directly to us, including face-to-face, over the phone, over email, or online;
- when you complete a form, such as registering for any events or newsletters, or responding to surveys;
- when you use any website we operate (including from any analytics and cookie providers or marketing providers. See the “Cookies” section below for more detail on the use of cookies);
- where you are a patient, from your doctor;
- from third parties, such as details of your use of any website we operate (from our analytics and cookie providers and marketing providers. See the “Cookies” section below for more detail on the use of cookies);

### **Why we collect, hold, use and disclose personal information**

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

Where you are our client, an employee of a General Practice, or a General Practitioner:

- to enable you to access and use our software, including to provide you with a login;
- to ensure the ongoing operation of and to improve the functionality and operation of our product;
- to assess whether to take you on as a new client, including to perform anti-money laundering, anti-terrorism, sanction screening, fraud and other background checks on you;
- to do business with you, including to assist your consultations;
- to contact and communicate with you about our business, including in response to any support requests you lodge with us or other enquiries you make with us;
- to contact and communicate with you about any enquiries you make with us via any website we operate;
- for internal record keeping, administrative, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our business, associated applications and associated social media platforms;
- for advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you;
- to run promotions, competitions and/or offer additional benefits to you;
- if you have applied for employment with us, to consider your employment application; and
- to comply with our legal obligations or if otherwise required or authorised by law.

Where you are a patient of our client, General Practitioners or General Practices, and we are provided with your personal information by our client:

- to provide analysis of your consultation in order to provide potential MBS billing item number suggestions for our clients; and
- to comply with our legal obligations or if otherwise required or authorised by law.

We do not require your personal information for our solutions to function and we have de-identification processes in place to help ensure your consultation notes cannot be re-identified. We may then use that information, which is no longer personal information, to train our model to improve our software.

### **Our disclosures of personal information to third parties**

**Personal information:** We will only disclose personal information (excluding sensitive information) to third parties where it is necessary as part of our business, where we have your consent, or where permitted by law. This means that we may disclose personal information (excluding sensitive information) to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers;
- marketing or advertising providers;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators or processors;

- our existing or potential agents or business partners;
- if we merge with, or are acquired by, another company, or sell all or a portion of our assets, your personal information may be disclosed to our advisers and any prospective purchaser's advisers and may be among the assets transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as analytics providers and cookies; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

**Google Analytics:** We may use Google Analytics Advertising Features. We and third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together. These cookies and identifiers may collect Technical and Usage Data about you.

You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalised ad delivery on the Google content network, please visit Google's Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#). To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select "ads" to control the settings. On iOS devices with iOS 6 and above use Apple's advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

To find out how Google uses data when you use third party websites or applications, please see [here](#).

### Overseas disclosure

We store your personal information in Australia. Where we disclose your personal information to third parties, those third parties may store, transfer or access personal information outside of Australia. We will only disclose your personal information overseas in accordance with the Australian Privacy Principles.

### Your rights and controlling your personal information

**Your choice:** Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to do business with you.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Restrict and unsubscribe:** To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

**Access:** You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

**Correction:** If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

**Complaints:** If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our

investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner.

### **Storage and security**

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

### **Cookies**

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

### **Links to other websites**

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

### **Amendments**

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

### **For any questions or notices, please contact us at:**

Pate Ventures Pty Ltd trading as MediBetter (ABN 33 665 806 182)

Email: [contact@medibetter.com.au](mailto:contact@medibetter.com.au)