

1. Policy Statement

AusCann Group Holdings Limited (ACN 008 095 207) and its wholly owned subsidiary, AusCann Operations Limited (ACN 601 953 860) (together, **AusCann**) is committed to managing your personal information in an open and transparent manner which is consistent with this Privacy Policy and the *Privacy Act 1988 (Cth)* (the **Act**).

This Privacy Policy outlines how AusCann may collect, store, use and disclose personal information. Terms used in this Privacy Policy have the same meaning as those in the Privacy Act. If you have any questions regarding this policy, please see the "Contact Us" section on how to contact AusCann.

Anonymity and pseudonymity

In most circumstances, it is impractical for people to communicate with us anonymously. We need to identify you to assist you effectively. However, in circumstances where it is lawful and practicable to do so, we will provide you with the option of not identifying yourself, or using a pseudonym, when entering into communications with us.

We may use personal information in aggregate form to improve our products and services and make them more responsive to the needs of our customers. This statistical compilation may also be used by us or third parties for marketing, advertising or research purposes.

Personal Information Collected by AusCann

"Personal information" is defined under the Privacy Act as information or opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not, and includes sensitive information.

The personal information which we collect, store, use and disclose will depend on the context. The personal information we collect from potential job applicants may include name, contact details and any other personal information provided by you during the course of your application.

We only collect personal information by lawful and fair means where reasonably necessary for our functions or activities as cultivator, producer, manufacturer and distributor of high quality, economical and clinically validated cannabinoid medicines. Typically, we collect personal information about individuals who:

1. conduct business or intend to conduct business with AusCann including investors (past, present and future), licensees, partners and research collaborators;
2. are business partners, or are part of an organisation which is a business partner, and includes contractors, external advisors and consultants;
3. are health practitioners (e.g. doctors, nurses, pharmacists)

4. are participants in AusCann sponsored programs (e.g. clinical trials, expert panels, and AusCann's Medical Education Program and Mentoring Program);
5. are members of the general public, in the course of health practitioners providing information for authorisations to prescribe safety monitoring requirements and for AusCann's reporting obligations to relevant government regulatory bodies such as the TGA, Office of Drug Control and relevant State Health Departments (as required);
6. are researchers associated with a research collaborator on an AusCann research project;
7. seek employment with, are employed by, or have been employed by AusCann;
8. seek work experience with, are undertaking work experience, or have undertaken work experience with AusCann; or
9. have otherwise contacted AusCann.

AusCann may collect your personal information from a third party who has disclosed the information to us with your consent, including but not limited to our business partners, related entities, health practitioners and regulatory or other government authorities.

AusCann may keep a record of visits to our website using, for example, 'cookies', to collect information on how you access the website. This information is collected automatically. You may disable the use of cookies on your web browser or remove or reject specific cookies from AusCann's website, however this may prevent access to the full range of content on the website.

Sensitive Information Collected by AusCann

Some personal information is considered 'sensitive information' for the purposes of the Act. The sensitive information which we may collect, store, use and may disclose includes information or an opinion about an individual's:

1. race or ethnic origin;
2. tax file number;
3. health; or
4. membership of a professional or trade association.

We only collect sensitive information about you if you consent to the collection of the information and the information is reasonably necessary for one or more of our functions or activities. The provision of sensitive information to us on a voluntary basis (including, for example, information you supply when applying for a position with AusCann) will be taken to be consent for this purpose.

Sensitive information (such as health information) may be released to AusCann by your health practitioner when providing information under the TGA Special Access Scheme or Authorised Prescriber authorisations, so that AusCann can comply with safety monitoring requirements and report to relevant government regulatory bodies such as the TGA, Office of Drug Control and relevant State Health Departments (as required).

Sensitive information may also form part of clinical research projects, in which case it will be collected and used, having obtained your consent for that collection and use as part of your agreement to participate in the research and/or as provided for under law.

Where possible, we will also enable you to provide that information using a pseudonym or otherwise in a manner which is de-identified. Further, protocols for such research include how this information shall be collected, stored and used, and are subject to review and approval by a Human Research Ethics Committee operating to the [National Statement on Ethical Conduct in Human Research](#).

Collection of unsolicited personal information

From time to time, we may receive unsolicited personal information about you. Unsolicited personal information is information we may receive from you which is not in response to a request by us for that information.

Where we receive unsolicited personal information about you (either directly from you or from a third party), we will consider, within a reasonable period, whether we could have collected that personal information from you had the personal information been solicited.

Where we determine that we could have collected the unsolicited personal information had it been solicited, we will store, use and disclose that personal information in the manner set out in this Privacy Policy.

Where we determine that we could not have collected the unsolicited personal information had it been solicited, we will destroy or de-identify that unsolicited personal information as soon as practicable, provided it is lawful and reasonable to do so.

Use of Personal Information

AusCann uses an individual's personal information for the purposes for which it was collected, or a purpose related to the purpose for which it was collected, and otherwise for internal management and related purposes. We collect, store and use personal information to:

1. communicate with you and assist us in the provision of products/services to you;
2. assist you by providing information and support;
3. manage any account you may have with AusCann;
4. keep you up to date with events that may be of interest to you;
5. administer our website and improve the user experience;
6. assist us in determining the needs of our shareholders and clients;
7. comply with regulatory obligations;
8. maintain a safety monitoring record from health practitioners of medical queries, adverse event or adverse reaction reports relating to our products and reporting these to relevant regulatory bodies, such as the TGA, as may be required;
9. provide health products or services (including advice) that have been requested; and
10. send you material on our medical education programs.

AusCann will not use your personal information for a secondary purpose unless:

1. you consent to the use or disclosure or you would reasonably expect us to use it for a secondary purpose which is related to the primary purpose;
2. the use or disclosure is required or authorised by law; or
3. the use or disclosure is otherwise permitted by the Privacy Act (for example, as a necessary part of an investigation of suspected unlawful activity).

Disclosing Personal Information

In general, AusCann will only disclose your personal information:

1. as provided for here in the Privacy Policy;
2. as per an agreement you enter into with us;
3. as allowed for under the Australian Privacy Principles or as otherwise required or authorised by law; or
4. with your consent.

AusCann will not sell, rent or lease your personal information to any other entity.

AusCann may provide your personal information to third parties on a confidential basis to achieve any of the purposes outlined above under "Use". These third parties are likely to be related entities, contractors that provide services to us, or parties such as regulators or authorities.

We may send your personal information to organisations or persons located overseas. For example, to our third-party technology services providers in relation to clinical trials and pharmacovigilance. The third-party service and storage entities we use are generally located in overseas and compliant to clinical trial regulatory standards including the US Federal Drug Administration.

Direct marketing

Unless you request otherwise, we may also use your personal information for marketing purposes to send you news, information about our activities and general promotional material which we believe may be useful or of interest to you. If you do not want us to use your personal information in this manner, please contact us using the contact details below and we will give effect to your request as soon as possible.

Adoption, use or disclosure of government related identifiers

Where we collect your personal information, it will usually be identified by a common identifier, such as your name, address or contact details. Subject to certain exceptions under the Act, AusCann will not disclose identifiers assigned by Government agencies or its agents, such as tax file numbers, or use those identifiers to identify your personal information.

Safeguarding Personal Information

We may store your personal information in hard copy, in electronic form, on electronic devices or on computer databases.

AusCann will take reasonable steps to ensure the security of your personal information. Technical and physical measures will be taken to reduce risk of loss, misuse, unauthorised access, unauthorised disclosure and alteration.

It must be recognised that the security of any data transmitted over the internet cannot be guaranteed.

Destruction / De-identification

AusCann takes reasonable steps to destroy or permanently de-identify personal information which is no longer needed for the purposes described in this Privacy Policy and where it is otherwise lawful to do so.

Accessing or Correcting Your Personal Information

You are entitled to access personal information AusCann holds about you. Normally a request by you to access your personal information will be fully granted. However, there may be legal or administrative constraints denying you full or partial access. A refusal by us to grant you full or partial access will be accompanied by an explanation, unless it is unreasonable to do so.

If you believe that the personal information AusCann holds about you is incorrect or incomplete, then you may request that it be corrected. AusCann will take reasonable steps to ensure that the correction is made within 30 days from the request, or such longer period as advised in writing. If AusCann does not agree with the grounds of the correction, AusCann will advise you in writing of the reason why. If you are unsatisfied with the outcome of your request, then you can refer your request to the Australian Information Commissioner.

We may ask you to provide proof of your identity if you make a request for access or correction.

2. Complaints, questions or further information

If you wish to make a complaint about a breach of your privacy by AusCann, you may contact us using the contact details provided below. All complaints will be investigated by an appropriately qualified representative of AusCann. We will endeavour to respond to your complaint as soon as practicable and, in any event, within 30 days. We will notify you of the outcome of the investigation, including how we propose to resolve your complaint and what, if any, corrective measures we will implement.

If you are not satisfied with our handling of your complaint, you may lodge a complaint with the Office of the Australian Information Commissioner (**OAIC**). For more information about doing so, visit <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

3. Open and transparent management of personal information

We make our Privacy Policy available on our website located at <https://www.auscann.com.au/privacy-policy.html> and can also provide a hard copy version upon request. If you would like more information or a hard copy of this Privacy Policy, please contact us via:

Email: info@auscann.com.au

Telephone: +61 8 9561 8834

4. Amendments

AusCann reserves the right to amend this Privacy Policy from time to time. If we do so, the amended Privacy Policy will be posted as soon as practicable following that amendments on our website (<https://www.auscann.com.au/>)

5. Definitions

Term	Definition
Act	Means the <i>Privacy Act 1988 (Cth)</i>
APP	Australian Privacy Principles – as defined in the <i>Privacy Act 1988 (Cth)</i>
Consent	Means express consent or implied consent, and has the same meaning as the Act.
NHMRC	National Health and Medical Research Council
Personal information	Has the same meaning as the Act and is information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) Whether the information or opinion is true or not; or (b) Whether the information or opinion is recorded in a material form or not.
Sensitive information	Has the same meaning as the Act and is: Information or an opinion about an individual's <ol style="list-style-type: none"> i. Racial or ethnic origin; or ii. Political opinions; or iii. Membership of a political association; or iv. Religious beliefs or associations; or v. Philosophical beliefs; or vi. Membership of a professional or trade association; or vii. Membership of a trade union; or viii. Sexual orientation or practices; or ix. Criminal record; that is also personal information or: <ol style="list-style-type: none"> x. Health information about an individual; or xi. Genetic information about an individual that is not otherwise health information; or xii. Biometric information that is to be used for the purposes of biometric verification or identification; or xiii. Biometric templates.