

CANN I HELP PRIVACY POLICY

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PRIVACY POLICY

1. WHO WE ARE AND THE APPLICATION OF THIS PRIVACY POLICY

- 1.1 Cann I Help Pty Ltd ACN 647 504 827 and its related entities (**CIH / we / us**) are companies based in Australia dedicated to the reliable, lawful provision of fairly priced medicinal cannabis.
- 1.2 CIH is governed by the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**) and when transacting with EU-based customers, also the *General Data Protection Regulation* (EU) 2016/679 (**GDPR**). The GDPR sets out the way organisations operating in the European Union (**EU**) or operating outside the EU but providing goods and services to the EU can collect and use, disclose and provide access to Personal Data.
- 1.3 **Personal Data** (and “Personal Information”, the term used in the Privacy Act) means any information relating to a Data Subject. A **Data Subject** (or “Individual” under the Privacy Act) is a natural person (i.e. not a corporation / business) who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.
- 1.4 We respect our customers’ (**you / your**) Personal Data, and this Privacy Policy explains how we manage it. This Privacy Policy covers CIH and all of its subsidiaries and related entities.
- 1.5 The examples listed in this Privacy Policy are indicative only, and should not be taken as an exhaustive list of Personal Data collected by CIH.

2. WHAT WE DO

- 2.1 CIH provides nursing, administrative and marketing services to independent clinical practitioners involved with the provision of medicinal cannabis services.

Examples of CIH’s current services where CIH might collect and use your Personal Data include the following:

- (a) processing your application and request/s for products and/or services;
- (b) processing data about your use of our website and services (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use);
- (c) processing information contained in an enquiry you submit to us regarding our services;
- (d) processing information relating to transactions, including purchases of our services that you enter into with us and/or through our website;
- (e) processing information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters;

- (f) processing information that you post for publication on our website or through our services;
- (g) considering your eligibility for our products and/or services;
- (h) administering your account, including requests and the provision of products and/or services;
- (i) providing reports and/or results, within the CIH group or to doctors or allied service providers or government regulators and agencies, about the product and/or services you request and use;
- (j) delivering products and/or services to you via post where our employees and/or a service provider will need to know at a minimum your name and address in order to deliver those services and products;
- (k) research and development, product and service evaluation and improvement;
- (l) informing you of special offers or discounts available to you from CIH or our partner organisations;
- (m) processing any of your personal data identified in this Privacy Policy where necessary, for the establishment, exercise or defence of legal claims, whether in Court proceedings or in an administrative or out-of-court procedure;
- (n) processing your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks or obtaining professional advice; and
- (o) processing your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

3. WHY WE COLLECT AND USE PERSONAL DATA

3.1 At CIH we take your personal privacy seriously. CIH may collect and use Personal Data about you or your patients:

- (a) because you have provided it directly to CIH, which could include data such as contact details, date of birth, gender and credit card numbers or bank account details;
- (b) to provide goods or services that you have requested or have been requested on your behalf, for example, by a medical practitioner or pharmacist;
- (c) to provide you with the most appropriate goods or services for your needs;
- (d) to improve our services, for instance, through the collection and analysis of statistical and research data and use of cookies;
- (e) because you work for us;
- (f) for purposes directly related to any of the above and any of CIH's services;
- (g) to provide follow-up on information regarding CIH including responding to comments or questions or providing our services to you;

- (h) to meet any requirements of government funding for programs including receiving, collecting and collating de-identified statistical information;
- (i) to monitor and evaluate existing services and plan for future services, research and development, and anonymized business intelligence; and
- (j) if we are required to share your information with government or regulatory bodies as required or authorised by law.

3.2 The legal bases for the processing of your personal data are as follows:

- (a) you have provided your consent for us to process your personal data;
- (b) we are required to process your personal data to protect our legitimate interests, such as for the proper administration of our website and business;
- (c) we are required to process your personal data to perform a contract between you and us and/or to take steps, at your request, to enter into such a contract;
- (d) for the protection and assertion of our legal rights, your legal rights and the legal rights of others;
- (e) for the proper protection of our business against risks; or
- (f) for compliance with a legal obligation to which we are subject.

3.3 We only use your personal data for purposes which are directly related to the reason you provided us with your information in the first place, where you would reasonably expect us to use your information, and/or (usually after anonymizing the data) for one of the other purposes identified in paragraph 3.1 above. This may possibly include sharing your personal or sensitive information with domestic and international service providers and in this event, we will ensure that such providers are contractually obliged to maintain your privacy on terms consistent with this privacy policy.

4. HOW WE COLLECT INFORMATION

4.1 We will collect Personal Data directly from you unless unreasonable or impractical for us to do so. CIH may also collect personal data in a variety of ways, including when you or a related party, for example a medical practitioner or pharmacist:

- (a) use our website;
- (b) phone or email us;
- (c) visit us in person or at events;
- (d) provide feedback to us;
- (e) use our services;
- (f) provide patient data.

5. DISCLOSURE OF PERSONAL DATA

5.1 Disclosure of personal data to third parties

CIH may disclose your information to a third party if the third party disclosure is reasonably necessary to provide our goods and services to you, and one or more of the following applies:

- (a) you have given your consent for CIH to disclose the information;
- (b) you would reasonably expect us to use or give that information for another purpose related to the purpose for which it was collected;
- (c) the third party is subject to contractual or statutory obligations to maintain your privacy on terms consistent with, or greater than, our own obligations;
- (d) we are required to disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in Court proceedings or in an administrative or out-of-court procedure;
- (e) it will prevent or lessen a serious threat to somebody's life, health or safety or to public health or safety;
- (f) it is reasonably necessary for us to take appropriate action in relation to suspected unlawful activity, or misconduct of a serious nature that relates to our functions or activities;
- (g) it is reasonably necessary for the enforcement of a law conducted by an enforcement body or is otherwise required or authorised by law.

6. DISCLOSURE OF INFORMATION ACROSS BORDERS

- 6.1** The hosting facilities for our website and software services are situated in Australia. Transfers to and from Australia will be protected by appropriate safeguards, namely the use of encryption or other data protection technologies.
- 6.2** Online payments may be processed using online payment systems operated by companies based in the United States of America, Australia, or EU, obliged to maintain reasonable standards of Personal Data privacy compliance.
- 6.3** You acknowledge that personal data that you submit for publication through our website or services may be available via the internet around the world in the circumstances described in this policy. Although we take reasonable care, we cannot and do not guarantee that others will never hack (or misuse) such personal data.

7. CAN I REMAIN ANONYMOUS?

- 7.1** It is your choice to provide information to us. Wherever it is lawful and practicable, you have the option not to identify yourself or to use a fictional name when interacting with us, however given the nature of our services and products this will rarely be possible. You can remain anonymous when using some parts of the CIH website, or sites administered by CIH.
- 7.2** It may be necessary for us to collect your personal data if you would like certain materials or services. If you choose to withhold the information we require, we may not be able to provide you the goods or services you have requested.

8. SECURITY AND STORAGE OF YOUR INFORMATION

- 8.1** CIH stores your information in a number of ways including physically (such as in paper form) or electronically with third party data storage providers. Your privacy and the security of your information is very important to us so where we store your information with third party providers, we will enter into contractual arrangements with those providers to ensure they take appropriate measures to protect your information.
- 8.2** Personal Data that we process for any purpose or purposes shall not be kept for longer than is industry standard for that purpose or those purposes.
- 8.3** We take appropriate steps to protect Personal Data held by us from misuse, interference, unauthorised access, modification, loss or disclosure. This includes during storage, collection, processing and transfer and destruction of the information. These steps include but are not limited to:
- (a) ensuring our computer systems and websites have security systems in place such as up to date firewall and data encryption;
 - (b) maintaining security systems and monitoring of our premises;
 - (c) implementing confidentiality agreements with our employees and contractors, sub-contractors and service providers;
 - (d) requiring all employees and contractors who handle, deal or work with Personal Data in the course of their duties with us to undergo training on our Privacy Policy and procedures, and information and data storage management, before undertaking those duties;
 - (e) maintaining document storage security policies and procedures; and
 - (f) implementing verification procedures for all inquiries/transactions to ensure only authorised people can access personal data.
- 8.4** CIH's website may contain links to external websites. We recommend that you review the privacy policies of those external websites as we are not responsible for their privacy practices.

9. YOUR RIGHTS

- 9.1** Your principal rights under data protection law are:
- (a) the right to access - you can ask for copies of your personal data;
 - (b) the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
 - (c) the right to erasure - you can ask us to erase your personal data;
 - (d) the right to restrict processing - you can ask us to restrict the processing of your personal data;
 - (e) the right to object to processing - you can object to the processing of your personal data;

- (f) the right to data portability - you can ask that we transfer your personal data to another organisation or to you;
- (g) the right to complain to a supervisory authority - you can complain about our processing of your Personal Data to the Office of the Australian Information Commissioner; and
- (h) the right to withdraw consent - to the extent that the legal basis of our processing of your Personal Data is consent, you can withdraw that consent.

9.2 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting the website of the Office of the Australian Information Commissioner: www.oaic.gov.au/privacy/.

9.3 You may exercise any of your rights in relation to your personal data by using the contact details set out in 14 below.

10. HOW TO ACCESS AND CORRECT YOUR INFORMATION

10.1 We will take reasonable steps to ensure that all Personal Data we collect, use or disclose is accurate, up-to-date, complete, relevant, and not misleading.

10.2 We will correct any Personal Data that we believe to be incorrect, out-of-date, incomplete, irrelevant or misleading. This may include taking reasonable steps to notify any organisation or government agency to which information was disclosed about the correction. You may request to access or correct your Personal Data at any time by contacting the Data Protection Officer using the contact details in 14 below.

10.3 If you request to access or correct your information, we will respond within a reasonable time (usually within 30 days). If your request is refused, we will give you a written notice that sets out the reasons for refusal and how to complain about the decision.

11. DIRECT COMMUNICATIONS AND PROMOTIONAL MATERIALS

11.1 Where permitted, we may send out promotional materials and informational materials from other government departments and third parties working with us.

11.2 If you do not wish to receive these communications, please contact CIH to unsubscribe from that mailing list.

11.3 Your information may also be used by us to provide you with details of other organisations' services where permitted by the Privacy Act or the GDPR or where you have consented to the use or disclosure of your Personal Data for direct communications and promotional materials.

11.4 It is our policy that any direct communications or promotional material will include a statement advising that you can request to not receive further material from us by contacting us using the details provided. Please note that if you choose this option this will also prevent you receiving offers of discounts and notices of upcoming sales as well as all promotional and informational materials.

12. COOKIES

12.1 The CIH website and sites administered by CIH uses software known as 'cookies' to record your visit to the website and collect some statistical information. We use this information to help administer and improve our websites. We do not use this information to personally identify you. Information we may collect includes:

- (a) your server address;
- (b) your domain name;
- (c) the date and time of access to the website;
- (d) pages accessed and documents downloaded;
- (e) the previous site visited;
- (f) if you have visited the website before; and
- (g) the type of browser software in use.

12.2 We use cookies for the following purposes:

- (a) authentication and status - we use cookies to identify you when you visit our website and as you navigate our website, and to determine if you are logged into the website;
- (b) personalisation - we use cookies to store information about your preferences and to personalise the website for you;
- (c) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (d) advertising - we use cookies to help us to display advertisements that will be relevant to you;
- (e) analysis - we use cookies to help us to analyse the use and performance of our website and services; and
- (f) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

12.3 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

12.4 You may set your browser to disable cookies when visiting our websites. However, some website functions may be unavailable if you choose to do so.

13. COMPLAINTS AND ENQUIRIES

13.1 CIH is committed to the protection of your privacy.

13.2 If you have any questions about how we handle personal data, would like to complain about how we have handled your information, or would like further information about our Privacy Policy, please submit a written query or complaint to our Data Protection

Officer. Our Data Protection Officer will assess any complaints and liaise with you to resolve any issues within a reasonable time (within 30 days).

14. CONTACT CIH

- 14.1 Call us 1800 044357
- 14.2 By Email info@cannihelp.com.au
- 14.3 By Post Attn: Data Protection Officer
PO Box 4579
Springfield, QLD, 4300

15. UPDATING OUR PRIVACY POLICY

- 15.1 We may update this policy from time to time by publishing a new version on our website.
- 15.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 15.3 We will update our Privacy Policy from time to time. Our website will have the most current Privacy Policy: www.cannihelp.com.au.
- 15.4 Last updated: 1/12/2021.