



Oncology Research International Limited  
ACN 067 964 621

## **Privacy Policy**

**June 2015**

Oncology Research International Limited (**ORIL**) is a research and development organisation with the objective of researching and developing plant-based therapies for the treatment of cancer and other diseases.

ORIL 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 ORIL 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 ORIL is subject to the *Privacy Act 1988* (Cth) (**Privacy Act**).

## **BACKGROUND**

Where the collection or handling of your personal information by ORIL is subject to the Privacy Act, ORIL 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.

## **WHAT PERSONAL INFORMATION DOES ORIL COLLECT?**

In the course of our business, ORIL may collect personal information about you that is necessary for us to perform our functions and activities. ORIL 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, email address and telephone number);
- bank account and payment details; and
- professional details (such as CVs).

ORIL may collect personal information about:

- persons who contact ORIL in relation to ORIL's research and development activities;
- the shareholders and investment partners of ORIL;
- consultants and contractors of ORIL;
- lead investigators and personnel of medical research institutes, universities, hospitals and specialist contract research organisations; and
- third parties providing a service to ORIL.

ORIL, in the course of its business activities as a sponsor for clinical trials, collects de-identified personal (including health) information about clinical trial participants. Participants in clinical trials give their written consent for this de-identified information to be collected by ORIL. Unsolicited identifiable information inadvertently received by ORIL will be immediately de-identified and, if not relevant or required for the research, will be destroyed.

Personal (including health) information of clinical trial participants may be recorded in medical or clinical trial documents and a study database. Clinical research staff contracted by ORIL or staff from regulatory agencies may access this information.

## **HOW DOES ORIL COLLECT PERSONAL INFORMATION?**

ORIL may collect your personal information in a number of ways including through our website and correspondence (written and verbal) with you.

ORIL typically collects your personal information directly from you. On some occasions, ORIL may collect your personal information from third parties such as consultants, medical research institutes, universities, hospitals and specialist contract research organisations as part of research projects.

## **FOR WHAT PURPOSES DOES ORIL COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION?**

The Privacy Act requires ORIL to use personal information only for the primary purpose for which it is collected, or for secondary purposes permitted by the Privacy Act (for example, secondary purposes which are related (or directly related in the case of sensitive information) to the primary purpose).

In general, ORIL collects, holds, uses and discloses personal information for the following purposes:

- to carry out our functions and activities such as considering or conducting research projects;
- to manage our relationship with you (including if you are a service provider, shareholder, investment partner, consultant, lead investigator or part of a medical research institute, university, hospital or specialist contract research organisation) 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 functions and activities and business processes;
- 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 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 ORIL 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 ORIL DISCLOSE YOUR PERSONAL INFORMATION?**

In order to carry out the above purposes, ORIL may disclose your personal information to:

- consultants or organisations engaged by ORIL to assist ORIL in carrying out the above purposes such as consultants assisting in relation to potential or actual research projects, data storage providers, IT support providers and professional advisors;
- partnering medical research institutes, universities, hospitals and specialist contract research organisations where helpful to consider, conduct or evaluate potential or actual research projects;
- regulatory authorities and human research ethics committees; and
- parties involved in a prospective or actual transfer of our assets or business.

## **WHAT HAPPENS IF YOU DON'T PROVIDE ORIL WITH YOUR PERSONAL INFORMATION?**

If you do not provide personal information requested of you to ORIL, we may be unable to carry out the above functions or activities.

## **HOW DOES ORIL HOLD YOUR PERSONAL INFORMATION AND MANAGE THE DATA QUALITY AND SECURITY OF YOUR PERSONAL INFORMATION?**

Subject to the following paragraph, ORIL stores your personal information using an external cloud based service provider with data centres in the United States of America. Access to stored data is only available by password.

ORIL's professional advisors store the personal information of ORIL's shareholders in Australia.

To the extent required by the Privacy Act, ORIL 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.

ORIL 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 ORIL TRANSFER PERSONAL INFORMATION OVERSEAS?**

As discussed above, ORIL stores personal information using an external cloud based service provider with data centres in the United States of America. In addition, ORIL engages consultants across the world to assist ORIL to carry out its functions and activities including in North America, New Zealand and the European Union

The countries in which our consultants are located may vary from time to time. ORIL may disclose personal information to those consultants from time to time.

ORIL will endeavour to take reasonable steps to ensure the recipient of the personal information does not breach the Australian Privacy Principles (other than Australian Privacy Principle 1) in relation to the information.

## **MARKETING**

ORIL 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 ORIL or third parties.

You may opt-out of receiving marketing information from ORIL 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 ORIL?".

## **HOW CAN YOU ACCESS OR CORRECT YOUR PERSONAL INFORMATION AND CONTACT ORIL?**

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: Oncology Research International Limited  
Attention: Dr Michael Wayte  
Level 6, 256 St George Terrace,  
Perth WA 6000  
Australia
- By telephone: +61 (0) 407 425 937
- By email: [info@oril.com.au](mailto:info@oril.com.au)

ORIL 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, ORIL 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 ORIL HANDLES COMPLAINTS**

If you have any concerns or complaints about the manner in which your personal information has been collected or handled by ORIL, please advise us of your concern or complaint in writing and send it to Dr Michael Wayte 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 June 30, 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.oril.com.au](http://www.oril.com.au) or contact Dr Michael Wayte as above.