

## Zed Privacy Policy Summary

This is a summary of the Zed global group's privacy policy, which may be used to help you navigate our privacy policy and understand how the Zed global group collects, uses, stores and disposes of your personal information. Please read the privacy policy in its entirety to understand how we handle your personal information.

### ***Collection of personal information – see section 1 of our privacy policy***

If you register to use our Services, we will need to collect certain information about you. We will also process some information when you use the Services or get in contact with us. If you are a job applicant or contractor, we may also collect identity information and information about your qualifications, experience and opinions from you and your references. This may also include a police check.

### ***How we use your personal information – see section 2 of our privacy policy for more info***

We use your information for a range of purposes, including to enable you to use the Services and provide you with support and updates. We also use personal information to assess your job applications, for direct marketing and in consultation with our business partners.

### ***Storing and sharing your personal information – see section 3 of our privacy policy for more info***

Our servers and third party suppliers which store your personal information are located in countries including Australia, Singapore and Ireland. We may share your personal information with third parties to help us provide the Services including to third parties located in the USA. When we provide information to a third party, it may only be processed on the terms of this privacy policy.

### ***Cookies and similar technologies – see section 4 of our privacy policy for more info***

We may collect personal information automatically through the use of functional, marketing, advertising and performance cookies.

### ***Data Retention – see section 7 of our privacy policy for more info***

We retain your information while we provide the Services and afterwards in accordance with our retention periods and as otherwise required by law.

### ***Your rights - see section 8 of our privacy policy for more info***

Depending on where you live, you may have particular rights with respect to your information, such as rights of access, to receive a copy of your data, or to delete your data or restrict or object to our processing of your data.

### ***Contacts and complaints – see section 9 of our privacy policy for more info***

If you have any questions or concerns about how we handle your personal information or you would like to exercise your rights in relation to your personal information, you can contact us using the details provided.

### ***Changes to this privacy policy – see section 10 of our privacy policy for more info***

If there are any significant changes to this privacy policy, we will update the policy by providing a new version here: [https://zedtechnologies.com.au/docs/privacy\\_policy](https://zedtechnologies.com.au/docs/privacy_policy).

### ***Supplementary terms – see the attachment to this privacy policy for more info***

If you reside in a particular country, certain terms may apply specifically to you and the processing of your personal information. Please check this section of the privacy policy for applicable supplementary terms.

## Zed Technologies Privacy Policy

In this privacy policy, **Zed, us, we** or **our** means Zed Technologies Pty Ltd (ACN 145 575 408), Zed Technologies (SG) Pte Ltd (Registration No. 201608906M) and Zed Technologies international Pty Ltd (ACN 663 567 736) and other members of the Zed global group. This privacy policy sets out how, when and why we collect, store, use, disclose and otherwise process personal information, including in connection with our **Services** (being access to and use of our website, software, mobile applications and related services).

Please read this privacy policy carefully – it is important you understand how we collect and process your information and how we control it.

**If you do not agree to the processing of your personal information in the way this privacy policy describes, please do not provide your information when requested and immediately stop using the Services. By using the Services you are accepting our processing of your personal information as described in this privacy policy.**

### 1 Collection of personal information

#### 1.1 *Information we collect directly from you*

Zed collects personal information when you enquire about, register for or use our Services. This includes information such as:

- identification and contact information (e.g. your name, email address, and telephone number);
- your log-in and other account details;
- information that you upload, transmit or share through the Services (including information about your health and medical conditions);
- your feedback and information about the support that you need using the Services; and
- information through customer surveys, promotions, competitions and any enquiries.

If you are a job applicant or wish to provide services to Zed, we may collect information such as:

- your name, residential address, postal address, telephone number, email address and banking or payment information;
- your gender and date of birth;
- details about your qualifications, skills, employment history and salary;
- links to your professional profile (e.g. LinkedIn or corporate website);
- your company name, company number, ABN and applicable tax information;
- your citizenship status and/or right to work; and
- information about whether you have a disability or illness that we need to accommodate;
- information that helps us identify your identity such as passport or utilities bills;
- emergency contact details;
- a police check.

#### 1.2 *Information we collect automatically*

We automatically collect certain data from you when you use the Services.

This includes your device ID, device type, geo-location information, computer and connection information,

network provider, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information.

We may also collect any additional information relating to you that you provide to us directly through our Services or indirectly through your use of our Services or online presence or through other websites or accounts from which you permit us to collect information.

### 1.3 *Information we collect from others*

We may collect personal information from third parties in some circumstances, such as:

- if you are using our Services as a patient, we collect diagnostic images and other associated information (including health information) from our customers, including your doctor or clinician; and
- if you are a job applicant, we collect information from your references or from publicly available sources e.g. data from your LinkedIn profile.

## 2 **How we use your Personal Information**

Below are the purposes for which we collect and use your personal information and the lawful bases:

Purpose	Lawful basis
<p>We use personal information to administer and improve the Services, including to allow you to access our software and mobile applications and to provide you with related services (which might include technical support).</p> <p>As part of providing the Services, we enable the uploading, sharing, receiving, viewing and storing of diagnostic imaging and other related information between patients and their doctors or clinicians.</p>	<p>We do this either to perform a contract that we have with you or otherwise as necessary to comply with our legal obligations.</p> <p>This activity is also necessary for our legitimate interest in running our business and providing you with the requested products and services and/or authorised access.</p>
<p>We use personal information to manage our relationship with you before, during and after your use of the Services, as well as to improve the Services and user experience.</p> <p>For example, we might collect and use personal information to:</p> <ul style="list-style-type: none"> <li>● respond to your queries;</li> <li>● manage concerns raised; and</li> <li>● conduct surveys, promotions and other activities that you choose to participate in.</li> </ul>	<p>This activity is necessary for our legitimate interest in promoting and improving our Services and business.</p> <p>In some cases, the activity is also necessary to comply with our legal obligations.</p>
<p>We use personal information to conduct direct marketing, including to inform you of products and services that may be of interest to you.</p>	<p>This activity is necessary for our legitimate interest in promoting and improving our Services.</p> <p>Processing of personal information for direct marketing purposes will only be with your consent. In the event that you do not wish to receive such communications, you may opt-out by letting us know via the contact details set out later in this privacy policy or through the opt-out mechanism in the communication.</p>

<p>We use personal information to understand how our Services are used and user preferences, and to improve the user experience.</p> <p>We do this by conducting certain data analysis and creating aggregate and anonymised data sets.</p>	<p>This activity is necessary for our legitimate interest in running our business and providing you with the requested products and services and/or authorised access.</p> <p>In some cases, the activity is also necessary to comply with our legal obligations.</p>
<p>We use personal information to verify and confirm who you are, and to secure and enhance the Services and our internal business.</p>	<p>This activity is necessary for our legitimate interest in running our business, to keep the Services and information secure, to prevent fraud and to ensure the security and integrity of our internal business.</p> <p>In some cases, the activity is also necessary to comply with our legal obligations (particularly as these relate to privacy and data security).</p>
<p>We use personal information to interact with you as part of the job application process.</p>	<p>This activity is necessary for our legitimate interest in running our business, including hiring employees and engaging suitable service providers. It is also necessary for us to comply with our legal obligations.</p>
<p>We use personal information to comply with applicable legislation and other legal and regulatory requirements and requests.</p>	<p>This activity is necessary for us to comply with our legal obligations.</p>

### 3 How we store and share your personal information:

Zed may store and disclose personal information to locations outside the country in which you live. If you are located in the United Kingdom or European Union, your information may be transferred outside of the European Economic Area (EEA) to countries that do not have laws equivalent to EEA data protection laws, including Australia. We may also engage service providers outside the EEA. When we transfer your personal information outside your country of residence, we take steps to ensure that your information is secure.

Our servers for the Services and third party service providers are located in the following jurisdictions:

- Australia;
- Singapore;
- Europe: Ireland,

We may disclose your personal information only where necessary and as follows:

- *Affiliates*: we may share information with our employees and the global Zed group;
- *Service Providers*: we may share your information with our third party service providers who assist us in providing our Services or in our business operations, including professional advisors, website services or analytics providers and any third party services you connect to our Services;
- *Our Partners*: we may share your information with our sponsors, resellers, or promoters, including in connection with any competition we conduct via our Services;
- *Sale or Transfer of Business*: we may share your information with any party to whom our assets or business (or any part of them) are transferred;

- *Recruitment or third party agencies:* we may disclose your personal information to recruiters who provide your information to us, to third party references you have provided us, and to enable verification and background checks for job applicants and service providers;
- *Legal Matters:* we may disclose personal information to government agencies, regulatory bodies and law enforcement agencies, as required, authorised or permitted by law; and
- *With your Consent:* we may share your personal information with third parties authorised by you to receive information held by us (e.g. doctors and clinicians).

While we take reasonable steps to ensure that third party recipients of your personal information comply with privacy laws that are similar to those in your jurisdiction, you acknowledge and agree that we cannot control the actions of third party recipients and so cannot guarantee that they will comply with those privacy laws.

#### **4 Cookies**

We may use 'cookies' on our website that help us track your website usage and remember your preferences. We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under applicable privacy laws. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

For more information on the functional, marketing, advertising and performance cookies we use, please review our cookie policy: <https://zedtechnologies.com.au/docs/cookies>

#### **5 Security**

We may hold your personal information in either electronic or hard copy form. We will take reasonable steps to protect your personal information from misuse, interference and loss, as well unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information.

Please understand that the transmission of information via the internet is not completely secure. While we will do our best to protect your personal information, we cannot guarantee the security of the information transmitted to our Services; therefore we do not assume any responsibility for any transmission of your information which you do at your own risk.

#### **6 Links**

Our Services may contain links to websites, software and applications operated by third parties. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of, or any content on, those linked services, and have no control over or rights in those linked services. The privacy policies that apply to those other services may differ substantially from this privacy policy and so we encourage you to read the terms of those other applicable privacy policies before using any third party services.

#### **7 Data Retention**

Personal information is retained for the following periods, unless otherwise required by law or agreed:

Personal information category	Retention period
Customer account data	Until you request erasure of such data. Customer data is deleted within 30 days of a lawful request from you for the erasure of such data.
Diagnostic imaging and other associated patient data	Until you request erasure of such data. Patient data is deleted within 30 days of a lawful request from you for the erasure of such data.
Survey information	Until you request erasure of such data. Survey data is deleted within 30 days of a lawful request from you for the erasure of such data.
Customer support information	Until you request erasure of such data. Support data is deleted within 30 days of a lawful request from you for the erasure of such data.
Employee or service provider data	In accordance with workplace and privacy retention obligations.

## 8 Your Rights

Some countries grant specific rights, which are set out in this section. If you are located in the United Kingdom or European Union, all of the below rights apply to you. If you are located in Australia, only “access” and “correction” rights apply. If you are located in any other country, the extent to which these rights apply to you will depend upon the laws of your country. If you would like to exercise any of these rights, please contact us using the contact details set out later in this privacy policy.

### 8.1 Access

You have the right to access personal information we hold about you, and know how we use it, and who we share it with. You can access the personal information you have made available as part of your account by logging into your Services account.

### 8.2 Correction

You have the right to correct any of your personal information that we hold that is inaccurate. You can access the personal information we hold about you by logging into your Services account.

### 8.3 Erasure

Where we process your personal information, you can withdraw your consent at any time, exercise your rights to object to processing based on legitimate interest, and ask us the source of personal information held and whether it came from publicly accessible sources. You can also object to us using your information for direct marketing purposes.

Note that exercising your right to be forgotten by requesting a removal of personal data may result in us being unable to provide some or all of our Services to you.

### 8.4 Restriction of processing

You have a right to require us to stop processing the personal information we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the personal information, we may use it again if there are valid grounds under data protection law for us to do so (e.g. for the

defence of legal claims or for another's protection).

Where we agree to stop processing the personal information, we will try to tell any third party to whom we have disclosed the relevant personal information so that they can stop processing the personal information too.

You may request we stop processing and just store the Personal Information we hold about you where:

- you believe the personal information is not accurate (for the period it takes for us to verify whether it is accurate);
- we wish to erase the personal information as the processing we undertake is unlawful (but you want us to retain the personal information and just store it instead); or
- we wish to erase the personal information as it is no longer necessary for our purposes (but you require it to be stored for the establishment, exercise or defence of legal claims).

## **8.5** *Portability*

If you wish for us to transfer your personal information to a third party, please ensure you provide appropriate details of that party. Note that we can only do so where it is technically feasible. We are not responsible for the security of the personal information or its processing once received by the third party.

## **8.6** *Objection*

You may object to our use of your personal information if we use your personal information on the basis of our legitimate interests (such as when we use your personal information for your account security, such as to prevent malicious log-ins). To the extent provided by applicable laws and regulations, you may also withdraw any consent to processing that you previously provided to us.

## **9** **Contacts and Complaints**

We welcome questions, comments and requests regarding this privacy policy.

In the event that you wish to make a complaint about how we process your personal information, then please contact us as soon as possible. This is without prejudice to your right to launch a claim with the relevant data protection authority where you consider we have infringed data protection laws.

### **9.1** *Contact details for customers*

Please contact Zed's Data Protection Officer on:

Email: [privacy@zedtechnologies.com.au](mailto:privacy@zedtechnologies.com.au)

Postal Address: PO Box 6276 Chapel St North, South Yarra, Victoria, Australia, 3141

## **10** **Changes**

If we make any material changes to this privacy policy, we will post the updated privacy policy on our website: [https://zedtechnologies.com.au/docs/privacy\\_policy](https://zedtechnologies.com.au/docs/privacy_policy). Please check frequently to see if there are any updates or changes to this privacy policy.

## Supplementary Terms: Australia

If you are located in Australia, the following terms apply to you:

### **1** Your rights

If you are dissatisfied with our response to your request for access to, or correction of, your personal information or your privacy complaint, you may contact the Office of the Australian Information Commissioner by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or telephone: +61 1300 363 992.

### **2** Transacting Anonymously

Where practicable, we will give you the option of not identifying yourself or using a pseudonym when interacting with us. You acknowledge that if you don't provide us personal information, we may be unable to provide you with access to certain sections of the Services or effectively respond to your query.