

Capitol Health Limited

ACN 117 391 812

Privacy Policy

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1. Purpose

Capitol Health Limited (**Capitol** or **the Company**) is a public company listed on the Australian Securities Exchange and is the parent entity for related subsidiaries that provide diagnostic imaging and associated services including general x-ray, magnetic resonance imaging, ultrasound, mammography, Doppler, orthopantomogram, echocardiography, computed tomography, CT angiography, cone beam CT, nuclear medicine, bone densitometry and fluoroscopy. Collectively Capitol Health Limited and its related subsidiaries will be referred to as “Capitol”, “we”, “us” or “our” within this Privacy Policy (**Policy**).

2. Application of the Policy

Capitol is subject to the *Privacy Act 1988 (Cth)* (**Privacy Act**) and handles the personal information (including health information) that it collects and holds in accordance with the Australian Privacy Principles (**APPs**) contained in the Privacy Act. In addition to the federal Privacy Act, Capitol must also comply with certain State and Territory legislation.

3. Overview

This Policy explains how we manage personal information and describes the sorts of information we hold and why, as well as how that information is collected, held, used, disclosed, and disposed of. We are committed to protecting the privacy rights of all stakeholders.

4. What is personal or sensitive information?

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

De-identified information is not personal information and involves the removal or alteration of other information that could potentially be used to re-identify an individual.

Sensitive information is personal information that is given a higher level of protection by privacy laws. It includes information about an individual’s health and includes genetic and biometric information. It also includes information about race or ethnic origin, political opinions, membership of political, professional or trade associations or trade unions, religious beliefs, sexual orientation or practices and criminal record. In this Privacy Policy when we talk about personal information, we include sensitive information.

5. Dealing with us anonymously

Where it is lawful and practicable to do so, individuals may deal with us anonymously or by using a pseudonym (e.g., when inquiring about services generally). However, if individuals wish to make a booking with our service, the service will require the provision of personal identifying information.

6. Our website

Visitors to our website do not disclose information unless they provide such information through the enquiry form. When individuals visit our website anonymously, non-personal information may be collected including but not limited to browser type, version and language, operating system, pages viewed while browsing the site, page access times and referring website address. This collected information is used solely internally for the purpose of gauging visitor traffic, trends and delivering personalised content to individuals while they are at this site.

7. What personal information is collected and held?

The information collected may include an individual's:

- name, address (postal and email) and telephone numbers;
- gender, date of birth, marital status, occupation, religion, country of birth, indigenous status, next of kin;
- medical history and other health information we are provided with or collect in the course of providing our services;
- payment information such as credit card details, health fund and health insurance cover details, workers compensation or other insurance claim details, Medicare details, concession card details;
- other information needed to provide services.

Capitol may also collect personal information about:

- patients in the course of providing diagnostic imaging services to patients;
- healthcare professionals in the course of referring patients for diagnostic imaging services to Capitol or engaging healthcare professionals to assist to provide diagnostic imaging services to patients;
- third parties providing a service to Capitol;
- the shareholders of Capitol Health Limited; and
- employees and contractors of Capitol.

In certain circumstances, you may have to provide someone else's personal information to Capitol Health (e.g., emergency contact). You must have their consent beforehand, and Capitol Health may ask you to provide evidence of that consent. You should not provide someone else's information if you do not have their consent, or for malicious purposes.

8. Why do we collect, use, and disclose personal information?

If an individual is to receive or has received a service from Capitol, we will collect, use, or disclose their personal information:

- to provide you, or your patient, with our products and services including diagnostic imaging services and other healthcare products and services;
- to enable your treating healthcare professionals to provide you with healthcare services;
- to invoice and process any fees payable in relation to the products and services rendered;
- to manage our relationship with you (including if you are a healthcare professional, patient, service provider, shareholder or employee) including billing 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 existing and new products and services;
- for quality assurance and insurance purposes;
- for commercial or business purposes relating to the running or management of our business;
- 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.

If you do not provide personal information requested of you to Capitol, we may be unable to provide you with the products and services you request of us.

If you provide your email address, telephone and/or mobile phone number, you also consent to Capitol 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.

9. How is personal information disclosed to others?

Capitol does not sell, rent, or trade personal information to, or with, third parties.

Capitol's website may contain links to other websites. The Company does not share your personal information with those websites and is not responsible for their privacy practices.

In some circumstances your personal information may be disclosed to service providers that perform a range of services on behalf of the Company including:

- mailing houses and printing companies;
- auditors and solicitors;
- registry providers;
- information technology vendors; and
- other consultants.

Personal information may be disclosed to third parties in Australia and overseas.

If the Company transmits your personal information over the internet (for example to third parties who hold data outside Australia) we will take reasonable steps to maintain the security of any personal information to prevent misuse and unauthorised access. Despite these protection mechanisms, you should be aware there are inherent risks associated with the transmission of data over the internet and we cannot guarantee any transmission will be completely secure.

Where the Company discloses your personal information to its service providers, it will take steps to ensure that they are authorized to only use personal information to perform functions required by the Company and in accordance with the Privacy Act.

The Company may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements. In particular, the *Corporations Act 2001 (Cth)* requires certain information about you to be included in the Company's registers which are able to be accessed by the public.

10. How do we collect personal information?

We will collect personal information from individuals directly where it is reasonably practical to do so. This often takes place in the ordinary course of delivery of a service such as when a person attends a Capitol facility for treatment, completes documents in order to receive that treatment, provides information over the telephone or applies for a job with us.

Other circumstances where we may collect information from third parties:

- from an individual's health service provider including specialists;
- from a health professional who has treated the individual;
- from an individual's health insurer or other insurer;
- from an individual's family;
- other sources where necessary to provide our services; and
- to assess job applicants (e.g. police checks).

11. Trans-border data flows

Our websites may be hosted by servers outside Australia and we may also use technical support services that are based off shore. This means that technically speaking, individuals' personal information may travel electronically from Australia to another country and back to Australia. When sending information offshore, we ensure all providers we engage can and will observe

the requirements of the Australian Privacy Principles.

12. Storing personal information

We may store personal information in different ways, including in paper and electronic form. The security of personal and information is important to us and we take all reasonable steps to protect it from misuse or loss and from unauthorised access, modification or disclosure. We ensure compliance with the Notifiable Data Breaches Scheme established under the Privacy Act.

Some of the ways we do this include:

- requiring our staff and contractors to maintain confidentiality and observe privacy laws to ensure compliance with the APPs;
- implementing document storage security;
- imposing security measures for access to computer systems; and
- only allowing access to personal information where the individual seeking access to their own information has satisfied identification requirements.

Personal information is retained for the period of time determined by law and is disposed in a secure manner.

13. Keeping personal information accurate and up to date

We take all reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. However, the accuracy of that information depends largely on the quality of the information provided to us. We therefore suggest that individuals:

- let us know if there are any errors in personal information; and
- keep us up to date with changes to personal information (e.g. their name and address)

Individuals may do this by mail, email or directly on the website (see Contact Us).

14. Accessing personal information

Individuals have a right to access their personal information and can contact us to request access. We may charge a nominal fee for providing access to personal information. In the event that copies of records are requested and approved, we may elect to charge for our reasonable costs involved in providing access. We will endeavour to advise individuals in advance if a charge will be imposed, and the likely amount of the charge. Individuals will be invited to consider other forms of access to minimise cost.

We will disclose individual's personal information to an individual's authorised representatives only where written authority has been provided or where evidence has been provided that nominated individuals can act on an individual's behalf. We cannot provide an authorised representative with access to an individual's personal information unless they can demonstrate that they have the individual's consent or have legal authority to do so.

15. Complaints

Individuals who believe that we have breached their privacy rights in any way or wish to discuss any issues about our Policy, should contact us on the details below so that we can try to satisfy any questions and correct any errors on our part.

However, if you are unhappy with our response, you have the right to make a complaint to the Privacy Commissioner on telephone number 1300 363 992 or in writing to:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney, NSW 2001

16. Contacting us

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: Capitol Health Privacy Officer, PO Box 551, East Melbourne, Victoria, 8002
- By telephone: +61 3 8383 6515
- By email: privacy@capitolhealth.com.au

17. Further information

If individuals would like more information about privacy in general, please refer to the Office of the Australian Information Commissioner's website www.oaic.gov.au.

18. Variations

This Privacy Policy is effective from 27 April 2022. The Capitol Board reserves the right to vary, replace or terminate this Policy from time to time. To obtain a copy of the latest version at any time, you should visit our websites at www.capitolhealth.com.au or contact the Privacy Officer as above.