AUSTRALIAN THERAPEUTIC SOLUTIONS
ABN: 89 627 762 396
*NIAGARA MEDICAL THERAPY, EQUISSAGE THERAPY, ACCELL ANIMAL HEALTHCARE (DIVISIONS OF)*
P.O.BOX 702, ARCHERFIELD, QLD, 4108
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1800 954 472

PRIVACY POLICY

Last updated: **November 2024**

## Scope

This document applies to personal information collected by Australian Therapeutic Solutions Pty Ltd (collectively, Niagara Medical Therapy, Equissage Therapy, Accell Animal Healthcare Divisions of "Australian Therapeutic Solutions Pty Ltd") ("we", "our" and "us") and sets out how we safeguard the privacy of your personal information.

## Introduction

The Australian Therapeutic Solutions Pty Ltd respects the privacy of your personal information and is committed to ensuring its proper collection, storage, use and disclosure. Under no circumstances will information be sold or made available to marketing agencies or similar parties who are not involved with us. The following statement addresses relevant privacy issues for the Australian Therapeutic Solutions Pty Ltd. However, if you have any further questions relating to this privacy policy, please do not hesitate to contact our Privacy Officer by phone.

Ian Bellion +61 (0) 7 3386 7222

## Privacy Policy

The Australian Therapeutic Solutions Pty Ltd recognises the importance of protecting the privacy of your personal and sensitive information we collect. We take all reasonable steps to ensure the continued integrity and security of the personal and sensitive information you entrust to us.

We appreciate that the success of our business is largely dependent upon a relationship of trust being established and maintained with past, current and prospective customers, clients and other individuals with whom we conduct business. We will therefore continue to collect and manage your personal information with a high degree of diligence and care.

We are bound to comply at all times with the privacy laws (incorporating the Australian Privacy Principles) that apply to us and this Privacy Policy sets out the manner in which we will comply with the relevant privacy laws.

If you have a comment or query regarding a privacy matter, we encourage you to discuss it with us. If you have a complaint about how we handle your personal or sensitive information, please refer to the complaints handling mechanism set out below.

## How Personal Information is Collected and Held

In this Privacy Policy, "personal information" and "sensitive information" have the meanings given to those terms by the Privacy Act 1988. "Privacy information" means personal information and/or sensitive information as the context permits.

We collect privacy information directly from you in situations where you interact directly with us (including, for example, when you contact us in relation to an inquiry about becoming an Agent, when you apply to become an Agent, or in relation to any inquiry regarding our goods and services including, without limitation, on the telephone or through our website).

Sometimes we collect or confirm privacy information from a third party where it is impracticable or unreasonable for us to collect from you directly. In particular, we collect information about you from our Consultants when they take orders for the supply of goods and/or services by us to their customers. Please note that we require our Agents to comply with our instructions in relation to the handling of your privacy information.

Regardless of whether we collect the information from you or from a third party (including the Consultants) about you, we will only use lawful and fair means to collect the information. In some cases we may also need to collect sensitive information from you (such as health-related information). Except where an exception under the relevant privacy law applies, we will ask you for your consent to collect this information before we do this.

For the purposes of complying with our obligations to certain refinancing institutions, we are required to collect personal information to confirm your identity and we may also collect personal information about you from commercially-available third-party databases.

We hold privacy information electronically and in hard copy form, both at our own premises and with the assistance of our service providers who are located in Australia. We implement a range of measures to protect the security of that privacy information and we enter into contracts with our service providers that require them to maintain the privacy of privacy information disclosed by us to them. We also take measures in respect of destroying or de-identifying privacy information that is no longer needed for any lawful purpose.

## Effect of non-provision of personal information; anonymity and pseudonymity

From time to time, you may be able to deal with us anonymously or by using a pseudonym. For example (without limitation), if you have a general inquiry about us and/or our goods and services, we may be able to respond to your inquiry on an anonymous or pseudonymous basis.

However, if the personal information we request for our provision to you of our goods and/or services is not provided to us, or you provide the information anonymously or pseudonymously, then we may be unable to provide the goods and/or services to you.

Further, we may need to verify your identity as part of our response to a request to access and/or correct your personal information we hold about you, or as part of our complaints-handling procedure (described in further detail below). If we are unable to verify your identity or you continue to engage with us on an anonymous or pseudonymous basis, then we may be unable to complete your request or pursue our complaints-handling process in relation to your complaint.

## Why We Use and Disclose Your Privacy Information

We use your personal information to provide you with products and services, and to perform our regular and necessary business functions.

We may disclose your personal information to organisations that carry out functions on our behalf, consumer credit and refinancing agencies, and to other third parties where the product or service requires this. We may also share your personal information within the Australian Therapeutic Solutions Pty Ltd Divisions.

We also use and disclose to our service providers (including sales Consultants and Agents) your privacy information in connection with providing, administering, improving and personalizing our products and services. This includes the following:

- processing invoices, bills, payments and related financial matters necessary for our provision of goods and services to you;
- delivering and fulfilling orders;
- notifying you of our new or existing products and services;
- contacting you to seek your feedback on the goods and/or services supplied to you;
- processing and providing refunds, discounts and warranty claims;
- verifying your identity, including in relation to the fulfillment of orders, the processing of invoices, bills and payments, and the processing and provision of refunds, discounts and warranty claims;

- communicating with you (or any organisation, company or group you represent) in relation to our products and services (including direct marketing in accordance with our privacy policy, as set out below);
- conducting product and market research (including surveys of our customers);
- maintaining our internal business functions and updating our records;
- dealing with enquiries and complaints from you; and
- Working with our service providers and Refinancing agencies.

Additionally, using personal information, we endeavor to improve our understanding of your interests, suitability and behavior in relation to products, services and offers, including assessments for financial products (Humm/Payright).

We may also handle your privacy information to protect our lawful interests.

We may collect and use sensitive information about you for the purpose of delivering and fulfilling orders for our products and services.

## Types of Privacy Information Collected (What Privacy Information about You does we collect and Hold?)

Without limiting the types of personal information which we collect, hold, use and disclose, the following are examples of the types of privacy information we collect:

- name(s), address, email address, telephone number(s);
- date of birth;
- Credit Card;
- name of Consultant;
- information about your present health and/or your expressed wishes about the future provision of health services to you;
- any additional information you provide, such as when you contacted our Customer Service Centre, or called us for assistance;
- any information you may provide to us through customer surveys;
- any other personal information which the Australian Therapeutic Solutions Pty Ltd is required to collect for identification verification purposes;
- Any additional information provided in a consumer or commercial credit application you make.

## Marketing and Promotional Communications and Materials

Where we collect your personal information from you directly, and you have a reasonable expectation (such expectation may be based on the fact that, at or before the time of collection, we notified you that your personal information may be used for direct marketing, and you did not advise us at the time you did not consent to such use) that we would use your personal information for the purpose of directly marketing ourselves and/or our goods and services to you, then we may use your personal information for the purpose of direct marketing, subject to our privacy policy.

Where we collect your personal information from a third party (such as an Agent) we will only use your personal information for the purpose of directly marketing ourselves and/or our goods and services to you when you consent to the use of your personal information for such purpose, unless it is impracticable for us to obtain that consent.

We may also use your personal information for customer service requirements, direct mail, marketing communications (via telephone, mobile, fax or email), market research, and product development purposes.

At any time you may opt out of receiving any communications from us (other than as required for our primary purpose or by law). We will not use any sensitive information we have collected about you to directly market to you.

## Access to and Correction of Your Personal Information

You may request access to personal information (including your credit information) that we hold about you by contacting our Privacy Officer at the address below.

Where we hold information that you are entitled to access, we will endeavor to provide you with a suitable range of choices as to how access is provided (e.g., emailing or mailing it to you) and we will, unless an exception applies, provide access to you in the manner which you request.

We may charge you a reasonable fee in relation to our costs incurred in arranging your access to your personal information.

Please also note that we will verify your identity before granting access to your personal information we hold. We take reasonable steps to correct personal information to ensure that, having regard to the purpose for which it is held, it is accurate, up-to-date, complete, relevant and not misleading.

If at any time you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request that we amend such personal information. If we refuse your request to correct or amend the personal information we hold about you, we will give you reasons in writing for our

refusal and provide you with information about our complaints-handling process should you not be satisfied with our reasons. Where we amend or correct your personal information, we will take reasonable steps to notify third parties bound by the APPs of the correction made to personal information that was previously provided to that party.

## Digital Services

We provide information through websites (e.g. niagara.com.au), and social media profiles. Australian Therapeutic Solutions Pty Ltd stores customer data in accordance with TGA, ASIC, and ACMA regulatory requirements. Accordingly, customer data may be processed only for the purposes for which they were originally collected, or to which you have given your consent

Data is protected and retained in accordance with applicable legislative requirements. Copies of what data is held on file may be requested by a customer at any time in writing. The stopping of processing of customer data may be requested in writing at any time except where the request contravenes State or Federal law or a regulatory requirement. The removal of customer data may be requested at any time in writing except where the request contravenes State or Federal law or a regulatory requirement.

For further information on specific regulatory requirements please see below links.

http://www.tga.gov.au/

http://www.acma.gov.au/

http://www.asic.gov.au/

## Complaints

If you wish to make a complaint about an alleged breach of your privacy of your privacy information or credit-related information or an alleged breach of the APPs or Part IIIA of the Privacy Act 1988 (Cth) or the Privacy (Credit Reporting) Code, the complaint should be made in writing to the attention of the Privacy Officer at the address below.

Receipt of your complaint will be acknowledged, and we will endeavor to deal with your complaint and provide you with a response within a reasonable time following our receipt of your complaint (which in most situations will be within 30 days of our receipt of your complaint). Where a matter requires a more detailed investigation it may take longer to resolve. We will provide you with progress updates if this is the case and may seek further information from you.

As noted above, we will verify your identity and seek, where appropriate, information from you in connection with the complaint.

Where required by the Privacy Act 1988 (Cth), we will provide written acknowledgment of your complaint and information on how we will deal with your complaint. Further, where we are required to do so by the Act, we will provide you our written determination on your complaint.

We may refuse to investigate and deal with a complaint if it is considered to be vexatious. If you are dissatisfied with the outcome of your complaint, you may seek internal review of our decision. Internal review will be conducted by an officer of the Australian Therapeutic Solutions Pty Ltd not previously been involved in your complaint.

If you are still dissatisfied with the outcome of your complaint, you are also able to take your complaint to an external dispute resolution provider (in the case of a complaint in relation to credit-related personal information) that applies to us and/or the Office of the Australian Information Commissioner for resolution.

## Contact

For information about privacy generally, or if your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au and on 1300 363 992.

Queries regarding privacy should be directed to our Privacy Officer (for the time being, the Director, Australian Therapeutic Solutions Pty Ltd)

Tel; (07) 3386 7222

Address: P O BOX 698,

Archerfield,

Queensland 4108

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# Credit Reporting Policy

Last updated: **February 2019**

## Scope

This document applies to credit information collected by Australian Therapeutic Solutions Pty Ltd (collectively, Niagara Medical Therapy, Equissage Therapy , Accell Animal Healthcare , Divisions of "Australian Therapeutic Solutions Pty Ltd") ("we", "our" and "us") and sets out how we safeguard the privacy of your Credit information.

## Introduction

The Australian Therapeutic Solutions Pty Ltd privacy of your credit information and is committed to ensuring its proper collection, storage, use and disclosure. Under no circumstances will information be sold or made available to marketing agencies or similar parties who are not involved with us. The following statement addresses relevant privacy issues for the Australian Therapeutic Solutions Pty Ltd. However, if you have any further questions relating to this privacy policy, please do not hesitate to contact our Privacy Officer by phone. Ian Bellion, +61 (0) 7 3386 7222

For the purpose of this credit reporting policy, "credit-related information" means credit information and/or credit eligibility information as those terms are defined in Part IIIA of the *Privacy Act 1988* (Cth).

Where we provide you with credit (in the form of us providing you with goods and/or services and allowing a time in excess of seven days for you to pay us for such goods and/or services) or where we are considering an application to provide you with credit, we may collect and hold various

information related to your financial position and we are bound by the provisions of the *Privacy Act 1988* (Cth) that apply to credit-related personal information which we hold, use and disclose.

Please note that this does not apply to any foreign credit information or information provided to us by foreign credit providers. We will take all necessary steps to ensure that information we hold is not available to foreign credit reporting bodies or foreign credit providers.

We may disclose your personal information to a credit reporting body for the purpose of obtaining from that body credit reporting information for a purpose related to the provision of credit to you in accordance with the relevant provisions of the *Privacy Act 1988* (Cth). For the purpose of such disclosures, the credit reporting bodies we may disclose your credit-related personal information are as follows: [Credit reporting bodies, (e.g. "Veda Advantage Information Services and Solutions Limited, Ringrose Credit Control Pty Ltd etc.")].

This information includes: (a) your identity details; (b) the fact that you have entered into an agreement with us to purchase goods and/or services from us; and (c) the fact that we are a credit provider to you.

Credit reporting bodies will provide us with "credit eligibility information", which is information related to your eligibility to be provided credit. "CP-derived information" means any personal information derived from information provided to us by a credit reporting body (for example, a credit score).

We may collect your credit-related information if you apply for credit from us or from a financier (including Flexi rent Capital Pty Ltd/Certegy Ezi Pay Pty Ltd) in relation to your purchase of goods and/or services from us on credit. We collect this information directly from you and we may collect this information from Consultants. We also collect credit-related information from credit reporting bodies or from other credit providers (including Flexi rent Capital Pty Ltd) where permitted by the *Privacy Act 1988* (Cth).

We collect and use your credit-related information in order to assess your financial position for our internal management purposes that are directly related to the management of our supply of goods and/or services, and where otherwise required or permitted by law.

We may disclose credit-related information about you to: (a) Divisions within the Australian Therapeutic Solutions Pty Ltd, or a person who manages credit, to manage credit or for related internal management purposes directly related to the provision or management of credit; (b) external dispute resolution providers; and (c) other persons where required or authorised by law.

Additionally, we may disclose to a credit reporting body information relating to your failure to meet payment obligations in relation to our provision of consumer credit to you or if you commit a serious credit infringement, including the type of credit provided, when the credit was provided, the terms and conditions pertaining to repayment of the credit, the maximum amount of available credit and when the consumer credit was terminated or otherwise ceased. However, you may request that the credit reporting bodies with whom we deal not to use or disclose credit reporting information about you if you believe on reasonable grounds that you have been, or is likely to be, a victim of fraud.

As a credit provider, we will provide you with access to the credit-related personal information we hold about you and the opportunity to correct such information in accordance with the policy that applies to personal information as set out above.

You may access our policy concerning the management of credit-related personal information by accessing our website from time to time; alternatively, you can contact our Privacy Officer (details set out below) to request a hard copy of our policy from time to time. We may disclose repayment history

information to the credit reporting bodies with whom we deal in accordance with the *Privacy Act 1988* (Cth).

In accordance with the relevant provisions of the *Privacy Act 1988* (Cth), we may also disclose to credit reporting bodies information about defaults on credit, except where an exception applies and where overdue payments previously disclosed by us to the relevant credit reporting body have been made. Where we have provided you with consumer credit and we consider that a serious credit infringement (as defined by the *Privacy Act 1988* (Cth)) has occurred, we will comply with our statutory obligations in relation to such alleged infringement, including taking reasonable steps to contact you regarding the act, and will disclose such infringement to the relevant credit reporting body in the manner and subject to the conditions set out in the *Act*.

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## Statement of Notifiable Matters under the Credit Reporting Privacy Code

Under the Credit Reporting Privacy Code, there are several 'notifiable matters' that we are required to disclose to you at or before the time of collecting personal information that is likely to be disclosed to a credit reporting body. Those matters are:

- the credit reporting body may include the credit information we provide to it in reports, which it then provides to other credit providers to assist those other credit providers to assess your creditworthiness;

- if you commit a serious credit infringement, we may disclose this to a credit reporting body;

- you can request a copy of this Credit Reporting Policy by contacting us, or obtain it directly from our website;

- you can request a copy of the privacy policy of [ Veda Advantage Information services and solutions Limited (veda.com.au) /Ringrose Credit Control Pty Ltd (ringrose.com.au) or by contacting them directly;

- you have the right to access credit information we hold about you, request that we correct the information, and make a complaint as set out in the Credit Reporting Policy;

- you can request a credit reporting body not to use your credit reporting information for the purposes of pre-screening of direct marketing by us; and

- You can request a credit reporting body not to use or disclose your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, the victim of fraud.