

## **Integria Healthcare Privacy Policy**

Integria Healthcare (Australia) Pty Ltd (**Integria**) and its related companies (including Integria Healthcare (New Zealand Limited)) (**we, our, us**) comply with the Australian Privacy Principles contained in the Privacy Amendment (Enhancing Privacy Protection) Bill 2012 amending the Privacy Act 1988(Cth) and the Information Privacy Principles contained in the New Zealand Privacy Act 1993 (to the extent these apply to each Integria entity).

This policy is in addition to [Integria Terms & Conditions](#) governing the website and should be read in conjunction with the [Terms & Conditions](#). Integria recognises that your privacy is very important to you and that you have a right to control your personal information. We know that providing personal information is an act of trust and we take that seriously.

This Privacy Policy outlines the type of personal information we may hold, the purposes for which it is held, and how that information is collected, held, used and disclosed. Our site may provide links to third party websites. Integria is not responsible for the conduct of non-Integria companies linked to this site. You should refer to the privacy notices and policies of any third party sites.

### **How different types of personal information are collected?**

The personal information that we collect could include your name, age, gender, the organisation you work for and ABN, your physical address, postal address, telephone and fax numbers and your email address. In some circumstances, a failure to provide such information could result in us being unable to assist you or provide our products or services to you.

We primarily collect information about you when you use or request a product or service, complete a survey, questionnaire or when you communicate with us by email, telephone, in writing or in person.

We will only collect information about an individual for purposes which are relevant to our business. For example, we may collect an individual's name, contact information and other details relevant to our business relationship with that person. In some cases, we may also be required by law to collect personal information, for example, occupational health and safety laws. This information may be required to respect an individual's request or provide our services.

In some instances if all necessary personal information is not provided, we may be unable to assess or process your information or provide you with the products or services you require.

We may also collect anonymous information regarding visitors to our website. This may include Internet Protocol (IP) address, previous sites visited, internet provider location and date and time of the visit.

### **Sensitive information**

We may collect sensitive information, such as health information when it relates to the provision of a good or service or its evaluation. We will only collect this information with your consent or otherwise in accordance with the Australian Privacy Principles and the New Zealand Privacy Act 1993 (to the extent either are applicable).

### **For what purposes do we collect, hold, use and disclose your personal information?**

It is important to know that by using our website:

- You agree that if you submit your personal information to us, we may create a database record about you.
- To receive our website services, you agree that we may collect information from you and from your use of our website, and you agree that this information may be disclosed to our service providers.

- You agree that we may use cookies on your browser (unless you remove them, please see below for explanation).
- You agree that we may contact you with information about products, special offers and updates (unless you have stated that you do not wish to receive these communications).

We collect, hold, use and disclose your personal information for the following purposes:

- to provide products or services to you;
- to answer enquiries and provide information or advice about our products or services and/or special offers, and general health advice where appropriate;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you;
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country);
- to ask you for your opinion or comments about our products and/or services;
- to promote our products, services and offers to you through a range of mediums, including but not limited to email, social media and third party online advertising on websites such as Facebook, Instagram and Google;
- to collect statistical data for marketing analysis; and
- to protect the rights, goodwill or property of Integria Healthcare.

We sometimes handle personal information relying on exemptions under the applicable Act. Under the Australian Privacy Act 1988 (Cth), these include exemptions in relation to (i) employee records; (ii) related bodies corporate; (iii) provision of services to State or Territory authorities; and (iv) overseas operations relating to personal information of non-Australians. Any permitted handling of personal information under such exemptions will take priority over this Privacy Policy to the extent of any inconsistency.

**Services which may be accessed by telephone or by mail include:**

- Information on health conditions and products brought to you by the Integria Healthcare brands.
- Retail enquiries. Consumers can contact our Product Advisory Line (0800 84 66 77) which provides personalised advice on our range of products.

**Services which may be accessed through some of our websites include:**

- Online naturopath for personalised advice on retail brands.
- Information about new products or services.
- Special offers.
- Email newsletters.
- Retailer support & training for retail brands.

Please note that information collected about you by our Naturopathic Helpline is not permanently recorded, and is securely discarded at the end of the query. Information collected by our Practitioner Clinical Support (Practitioner brands: MediHerb, MH Enhance, Eagle, Nutrmedicine, Phytomedicine) is recorded, and is kept on file in the instance that we need to refer back to it if there necessary.

**Restricted Access - Practitioner websites**

Our Practitioner websites ([www.mediherb.com.au](http://www.mediherb.com.au), [www.eaglenaturalhealth.com.au](http://www.eaglenaturalhealth.com.au), [myintegria.com](http://myintegria.com)) are restricted websites. Access to those portions of the website containing Professional Literature and other designated materials is limited to Qualified Health Care Professionals only, who have complied

with Practitioner requirements for such access. Access to the website is managed by a secured user name, password, and registration system. If you have an identified user name and approved password, you may use it to log onto the website. If you are a legitimate health care professional who desires access to the website, you must complete the on-line application for registration on the relevant Practitioner brand website. The on-line form must be completed, including nominating your preferred user name and password, then submitted to the Practitioner brand as per the instructions on the website.

### **Our Use of Cookies**

Cookies are pieces of information that a website transfers to your computer's hard disk for record-keeping purposes. Most web-browsers are set to accept cookies. However, if you do not wish to receive cookies you may set your browser to refuse cookies. The use of cookies can enhance your enjoyment of what is offered on this website, because they can help personalise your experience. Cookies can also help us improve the website by providing aggregate information on how people use the site and which areas are effective and those that are not.

Cookies in and of themselves do not personally identify users, although they do identify a user's browser. The cookies simply operate as a unique identifier which helps us to know what our users find interesting and useful on our website, almost like a questionnaire. We do not link this information back to other information that you have provided to us. We do not store any information inside cookies.

### **Website analytics and Social Media Sites**

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using this website, you consent to the processing of data about you by Google in the manner described in [Google's Privacy Policy - external site](#) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or [use the opt-out service provided by Google - external site](#).

Integria also may use interfaces with social media sites such as Facebook, LinkedIn, Instagram, Twitter and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other personal information.

### **Communicating with you**

We may contact you at your email or other address (including social media pages), which you provide to us in order to:

- provide you with information that may be of interest about Integria Healthcare's brands, products and special offers and other matters which may interest you; and
- for those of you with an email address, to send you an email newsletter. By registering to receive email newsletters from Integria Healthcare, you consent to be the recipient of commercial and non-commercial electronic messages from Integria Healthcare and its brands.

We will not send you advertising information without first asking you whether you wish to have promotional information sent to you.

## ***AdWords Remarketing Privacy Policy***

### **This website uses Google AdWords**

This website uses the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site. AdWords remarketing will display relevant ads tailored to you based on what parts of our site you have viewed by placing a cookie on your machine. This cookie does not in any way identify you or give access to your computer. The cookie is used to communicate to other websites "This person visited this page, so show them ads relating to that page." Google AdWords Remarketing allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use advertising cookies (from DoubleClick) to associate your browser with interest and demographic categories, and serve ads based on your past visits to this website. Of course, any data collected will be used in accordance with our own privacy policy and Google's privacy policy. Visit [Google's Privacy Policy](#) for a full understanding of the data shared by Google to advertisers.

### **How to opt-out**

If you do not wish to participate in our Google AdWords Remarketing, you can opt out by visiting [Google's Ads Preferences Manager](#). You can opt out of interest-based advertising entirely by cookie settings or permanently using a browser plugin.

You can also opt out of any third-party vendor's use of cookies by visiting [www.networkadvertising.org/choices/](http://www.networkadvertising.org/choices/)

### ***Facebook Custom Audience***

Personal Data collected: Cookies and email address.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.

We also use search engine and social media sites to provide promotional news or marketing offers which may be of interest to you. If you consent to the sharing of your information with a third party, including social networking sites such as Facebook, your personal information will be disclosed to the third party and will be subject to the privacy policy and business practices of that third party.

We may share hashed portions of your personal information with certain strategic partners to make our business more responsive to your interests and/or those of like-minded consumers. For example, we may aggregate your email address together with the email addresses of others who use our website or our services and transmit the hashed data to Facebook for the purpose of creating "Custom Audiences" (where targeted ads are sent to people on Facebook who have already used our services or been to our website). You can opt out of being included in the Custom Audience at <https://www.facebook.com/business/help/1415256572060999>.

As Facebook controls the display of your ad preferences, please refer to Facebook's page titled About Facebook Adverts for an explanation on how to adjust your Facebook ad preferences, available at [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen).

You can also opt out from a wide range of online advertising services using Network Advertising Initiative's [opt-out page](#) or the Digital Advertising Alliance's [WebChoices tool](#).

### **Opting out of communication**

An 'opt out' mechanism is offered, so that you may have the opportunity to decide to not receive marketing or promotional information from us. We will remove you from any of our lists that may be used for communication purposes. At any time you may contact the company to 'opt out' of any future direct marketing. Additionally on all direct marketing correspondence, the 'opt out' mechanism will be made clear. To contact us email:[enquiries@integria.com](mailto:enquiries@integria.com)

### **How is personal information disclosed?**

Personal information held by us is disclosed by us in accordance with the Australian Privacy Principles and the Information Privacy Principles contained in the New Zealand Privacy Act 1993 (to the extent either are applicable). We will only disclose personal information to a third party where we have your consent, or where the disclosure is permitted or required by law. For example, we may disclose information as follows.

- Integria's related companies.
- External providers, such as suppliers, consultants and agents, including organisations that provide information technology and infrastructure support services that provide information technology and infrastructure support services.
- Tax, financial, audit and legal advisers.
- Government, regulatory and law enforcement bodies.

Generally, Integria will retain your personal information within Australia and New Zealand only and not use or disclose it to other overseas countries unless otherwise stated in this Privacy Policy.

### **Event registration, marketing database and Live Chat services**

Integria contracts out some functions and relies on third party suppliers to conduct specialised activities such as event registration services conducted by Cvent Inc, marketing database services provided by Mailchimp and Live Chat platform operated by Tawk.to. Services provided by these third parties are controlled and operated from the United States and are not intended to be subject to the laws or jurisdiction of Australia. You agree that by providing personal information it may be accessed by these organisations providing services in any country where they have facilities or in which they engage service providers, and you consent to the transfer of information to countries outside of Australia, including the United States, which may have different data protection rules than those in Australia. These third-party service providers are required not to use your personal information other than to provide the services requested by us. We will take all reasonable steps necessary to ensure that any personal information transferred overseas is kept securely and in accordance with our privacy laws by the overseas entity.

### **Security of your personal information**

We take precautions including administrative, technical and physical measures to safeguard your personal information against loss, theft and misuse, as well as against unauthorised access, modification, disclosure, alteration and destruction. We protect electronic data using a variety of security measures including password access, data back-up and firewalls.

### **Keeping personal information up-to-date**

We seek to ensure that the personal information it holds is accurate, up-to-date and complete. If we are informed that the information it holds is inaccurate, out-of-date or incomplete, we will correct the information or ensure that the amendments or errors are noted.

## **What do we do with personal information when it is no longer needed?**

We destroy personal information if it is no longer needed for the purposes for which it was collected, or if the law no longer requires us to retain it. We use secure methods to destroy or de-identify the information. We dispose of all hard copy documents and delete electronic information from our systems.

## **Access and correction**

At any time you can advise us of changes to your personal information. You have the right to ask for the personal information held about you and to advise of any inaccuracy. If you make an access request, we will ask you to verify your identity and specify what information you require. Your request must be in writing.

We may ask the reason for your request so we can assist you most effectively. However, you are under no obligation to provide a reason if you do not wish to. We reserve the right to charge a fee for any significant costs incurred by us in providing access to personal information.

Your trust in Integria Healthcare and our brands is very important to us. If at any time you want to know exactly what personal information Integria is holding about you, you are welcome to request it by e-mailing us at [enquiries@integria.com](mailto:enquiries@integria.com).

## **Changing and deleting the information we have about you**

If at any time you wish to change personal information that is inaccurate or out of date, please contact us by e-mailing us at [enquiries@integria.com](mailto:enquiries@integria.com) and we will change this record. If you wish to have your personal information deleted, please let us know in the same manner as referred to above and we will take all reasonable steps to delete it unless we need to keep it for legal reasons.

## **Complaints**

If you believe your personal information is not properly protected, or that there has been a breach or potential breach of this Privacy Policy or the privacy legislation, please contact us immediately and ask for your complaint or concern to be directed to the Privacy Officer.

We take breaches seriously and has procedures to help identify and resolve a breach, potential breach or complaint as quickly as possible. This includes appropriate escalation processes to the General Counsel and notification processes in the event of a serious breach.

Every complaint is forwarded by the staff member who receives it to the Privacy Officer. You will be notified of the process for dealing with the breach or potential breach. Your complaint will be thoroughly investigated and a suitable resolution negotiated with you.

If you are not satisfied with the resolution of your complaint by us, in Australia you may contact the Office of the Australian Information Commissioner (OAIC) (<http://www.privacy.gov.au/complaints>) who may investigate your complaint. In New Zealand, you may contact the Privacy Commissioner (<http://www.privacy.org.nz>) who can offer further guidance and investigate your complaint if necessary.

## **Further information**

Our aim is to respond to all enquiries promptly. For enquiries or feedback about this policy or for complaints about our handling of personal information, please email the Privacy Officer at [privacy@integria.com](mailto:privacy@integria.com) or otherwise you can: mail to:

Privacy Officer  
Integria Healthcare (Australia) Pty Ltd

Level 5, 35 Chandos Street  
St Leonards NSW 2065

or

Telephone:+61 (0)2 9934 6683

### **Future Changes**

Our commitment to make our company and brand websites leaders in natural healthcare means that we are constantly adding to and changing this site. Because of this, from time to time, our policies will be reviewed and may be revised. Integria Healthcare reserves the right to change our Privacy Policy at any time and notify you by posting an updated version of the policy on our web site. The amended Privacy Policy will apply between us whether or not we have given you specific notice of any change.

This document was last updated on 28 August 2019.

See [Terms & Conditions](#).