



Review Date:	1 Feb 2014
Recommended by:	General Counsel & Company Secretary
Authorised by:	Managing Director and CEO

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## Sigma Privacy Policy

### 1. Respecting Your Privacy

Sigma Pharmaceuticals Limited (Sigma) is a leading full line wholesale and distribution business to pharmacy. It is also the owner of Australia's best known pharmacy retail brands in Amcal Max, Amcal and Guardian.

Sigma is committed to supporting the 'Australian Privacy Principles for the Fair Handling of Personal Information' contained in the Privacy Act 1988. These principles are used as the basis of the standards we adhere to surrounding the collection, access, storage and use of personal information which we may obtain during the course of operating our business.

This Privacy Policy is designed to inform you regarding the sort of information that we may collect about you. Sigma's policies on the management of personal information, and an overview of what sort of information we hold, why we might do so, how we might collect, store, use and disclose that information.

Sigma's Privacy Officer is the company's General Counsel and Company Secretary.

Contact details are:

General Counsel and Company Secretary  
3 Myer Place  
Rowville  
Victoria 3178  
telephone 03 9215 9596  
facsimile 03 9215 9799

If you have any issues regarding privacy with Sigma you should contact your usual Sigma representative or the Privacy Officer.

### 2. Collection of personal information by us

Sigma will only collect information that is necessary for its functions or activities. Sigma is required to collect your personal information in order to provide you with products or services.

The kinds of personal information we collect and store will depend on what products and services you request from us. However, it may include (amongst other things):

- your opinion/preferences about specific products and services, your name, address, telephone numbers, e-mail address, credit card details to facilitate;
- communications between you and us; and
- transactional information about your use of our products and service.

Information about transactions relating to prescription products is only stored by Sigma in a de-identified format and this information is not shared with other organisations.



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### 3. How your personal information will be used

We collect your personal information so that we can use it for our functions and activities which include, amongst other things:

- activating your account and confirming your details;
- processing your orders;
- being aware of any special product and service requirements you may have;
- providing you with electronic confirmation of your orders (where applicable) and advising you of any changes to our products and services;
- confirming your identity when you contact us;
- addressing any feedback or complaints you may have;
- any purposes for which it was requested and directly related purposes, and developing, improving and marketing our products and services.
- Sending you marketing materials.

If you do not provide us with your personal information, we will be unable to do one or more of the above (including being unable to accept any orders and service requests). We will assume you consent to management of your personal information in the manner specified in this Privacy Policy (which may change from time to time) until you tell us otherwise by contacting the Privacy Officer.

### 4. Exchange of personal information with third parties

Personal information we collect from you may be disclosed:

- to any entity to which we are required or authorised by or under law to disclose such information (for instance, Federal or State law enforcement agencies and investigative agencies, courts, various other Federal or State government bodies);
- to others that you have been informed of at the time any personal information is collected from you;
- to our business associates and others for purposes directly related to the purpose for which the personal information is collected;
- to Sigma management and personnel;
- to our professional advisors and other contractors (for example IT consultants and mailing houses); or
- with your consent (express or implied), to others.

We may also obtain personal and other information from some or all of the above to enable us to provide our services or products to you. When we obtain personal and other information from third parties whom we are referred to by you, we will assume and you will ensure that you have made that third party aware of the referral of the persons and purposes involved in the collection, use and disclosure of the relevant personal or other information.

### 5. Use and disclosure of personal information by us

If we use or disclose your personal information for a purpose (the "secondary purpose") other than the main reason for which it was originally collected (the "primary purpose"), to the extent required by law, we will ensure that:



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- the secondary purpose is related to the primary purpose of collection (and directly related in the case of sensitive information), and you would reasonably expect that we would use or disclose your information in that way; or
- you have consented to the use or disclosure of your personal information for the secondary purpose; or
- the use or disclosure is required or authorised by or under law; or
- the use or disclosure is otherwise permitted by law (for example, as a necessary part of an investigation of suspected unlawful activity).

### 6. Taking Care of your Personal Information

- 6.1 Sigma will take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure.
- 6.2 Sigma will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed.

### 7. Access and correction of your personal information

You can ask to obtain access to your personal information that we and/or our contractors hold, although under some circumstances permitted by law, we may not provide such information to you. Also, we may not be able to require our contractors to provide personal information to you.

We may ask you to put your request in writing and pay a reasonable fee levied by us for this.

It is important to us that the personal information we hold about you is accurate, complete and up to date. If you are aware that this is not the case and would like your personal information corrected, or simply desire access to your personal information, please contact us at:

General Counsel and Company Secretary  
3 Myer Place  
Rowville  
Victoria 3178  
telephone 03 9215 9596  
facsimile 03 9215 9799

### 8. Transfer of your Personal Information Overseas

It is unlikely that Sigma would disclose your personal information to overseas recipients that would only happen if: it were transferred to someone (other than the organisation or the individual) who is in a foreign country if:

- (a) Sigma reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the National Privacy Principles; or
- (b) the individual consents to the transfer; or



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- (c) the transfer is necessary for the performance of a contract between the individual and Sigma, or for the implementation of pre-contractual measures taken in response to the individual's request; or
- (d) the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between Sigma and a third party; or
- (e) all of the following apply:
  - (i) the transfer is for the benefit of the individual;
  - (ii) it is impracticable to obtain the consent of the individual to that transfer;
  - (iii) if it were practicable to obtain such consent, the individual would be likely to give it; or
- (f) Sigma has taken reasonable steps to ensure that the information which it has transferred will not be held, used or disclosed by the recipient of the information inconsistently with the National Privacy Principles.

## **9. Complaints**

- 9.1 Any complaint by an individual regarding Sigma's management or handling of personal information should be directed to Sigma's Privacy Officer. Contact details are set out at the commencement of this Policy.
- 9.2 To enable a complaint to be properly understood and acted upon it is requested that it be made in writing, specifying the personal information involved and the contact or process at Sigma the subject of the complaint.
- 9.3 All complaints will be acknowledged within 3 business days of receipt. Contact details of the person in Sigma dealing with the complaint and the Privacy Officer will also be advised to the individual making the complaint at this time.
- 9.4 Complaints will be responded to within 15 business days. If this is not possible the individual will be advised as to when Sigma expects to be able to respond.
- 9.5 If Sigma's response does not resolve the complaint Sigma and the individual will in good faith promptly agree a process and time frame for dealing with the complaint.