

PRIVACY POLICY

VGI Health Technology Limited (VTL)

VTL is committed to protecting your personal information.

This Privacy Policy explains how VGI Health Technology Limited (ACN 111 082 485) (**VTL** or **Company**) and VTL's subsidiaries from time to time, currently being the companies set out in Schedule 1 (**VTL Group**) (collectively "**we**", "**our**" or "**us**") manages personal information and how to contact us if you have any further queries about how we do this.

Background

We comply with the thirteen Australian Privacy Principles (**APPs**) in the Privacy Act 1988 (Cth) (the **Act**) except where the Act does not require this. The APPs regulate how to handle personal information throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal.

Personal information is information or an opinion, in any form and whether true or not, about an identified individual, or an individual who is reasonably identifiable. Special rules apply for collecting personal information which is sensitive information. This includes health information and information about a person's race, ethnic origin, political opinions, membership of political, professional or trade associations, religious or philosophical beliefs, sexual orientation or practices and criminal history.

Members of the VTL Group will from time to time sponsor clinical trials. Those trials may involve the collection of personal information (including health information). Special arrangements will be made with respect to that information.

The kind of personal information we collect and hold

We supply products and services to customers including to individuals like you. The personal information that we collect about you is the information that is relevant to those products or services. In general, we may collect the following personal information about you:

- Your contact details including your name, postal address, email address, mobile number
- your credit card number or any other payment or banking information that we need in order for you to pay us for products or services that we supply to you.

We may use that personal information to promote our products or services.

How we collect and hold personal information

To the extent required by the Act:

- we will not collect personal information about you unless that information is reasonably necessary for one or more of our functions or activities; and
- we will collect personal information only by lawful and fair means.

When we collect personal information directly from you, we will take reasonable steps at or before the time of collection to ensure that you are aware of certain key matters, such as the purposes for which we are collecting the information, the organisations (or types of organisations) to which we would normally disclose information of that kind, the fact that you are able to access the information and how to contact us.

The purposes for which we handle personal information

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 the Act, we will ensure that:

- 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 the Act (for example, as a necessary part of an investigation of suspected unlawful activity).

We may disclose personal information to our service providers to facilitate our provision of products or services to you. We require our service providers not to use that personal information for any purpose other than to perform their services to us. We also require them to comply with appropriate data quality and security requirements.

Data quality and security

To the extent required by the Act, we will take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, complete and up to date;
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the Act.

Transfer of personal information overseas

We may transfer personal information to our service providers, who may have cloud-based facilities that utilise computer servers located overseas. If we transfer personal information in this way, we will take reasonable steps to ensure that any overseas recipient does not breach the APPs in relation to the disclosed personal information. This obligation will not apply if:

- we reasonably believe that the recipient of the information is subject to legal obligations that have the effect of protecting the information in a way that, overall, is at least substantially similar to protection under the APPs and there are mechanisms that you can access to enforce that protection;
- you give us consent to disclose your personal information to an overseas recipient, expressly or by implication, after you are expressly informed by us that if you consent we will not be required to take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to the information; or
- we are legally authorised to do so.

Access and correction of your personal information

Please contact us c/- the Privacy Officer (contact details below) if you would like to access or correct the personal information that we hold about you. We will generally provide you with access to your personal information if practicable (although a fee may be imposed) and will take reasonable steps to amend any personal information that is incorrect. In some circumstances, we may not permit access to your personal information, or may refuse to correct your personal information, in which case we will provide you with reasons for this decision.

Questions or complaints

Please contact our Privacy Officer if you have any questions or complaints about the personal information that we hold about you or about the way we handle that personal information. We will acknowledge your question or complaint as soon as possible and will seek to address any question or complaint within 14 days after that.

Notifiable data breaches

If there is a loss, or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, we will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with the Act.

Changes

We may change this Privacy Policy from time to time. You can find our up-to-date Privacy Policy posted on our website from time to time.

Website

When you use our website, we can identify your web browser but we don't identify you. We may use web browser data for website optimisation purposes.

We use "cookies" on our website. A cookie is a text file placed on your computer, to either improve the functionality of the website or help us analyse how users use our website. We do not link back to your identity from the information generated by the cookie about your use of the website (including your device's IP-address). If you do not wish us to use cookies, you can configure the browser settings of your computer or your devices for that purpose.

Contact us: Privacy Officer

The Company Secretary of VTL is our Privacy Officer. You may contact the Privacy Officer at info@vgiht.com.au.

The postal address is:

VTL Privacy Officer
VGI Health Technology Limited
4503/19 Martin Place
Sydney NSW 2000

Schedule 1 Subsidiaries

Invictus BioPharma Pty Ltd

Azure Health Prime Distribution Pty Ltd

Invictus Biotechnology Pty Ltd

Invictus OPS Pty Ltd

Invictus Overseas Holdings Company Pty Ltd

Invictus Nutraceuticals, Inc. (USA corporation)