

# Microba Privacy Policy

## Your privacy is important

This privacy policy outlines how Microba Pty Ltd ABN 30 628 603 225 and its related bodies corporate and associates (**we, us or our**) collect, holds, uses and discloses personal information.

We appreciate that your privacy is very important, and we are committed to handling your personal information (including your health information and any other sensitive information about you) in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**).

## Kinds of personal information we collect

We collect and hold personal information about customers and potential customers, contractors and other people who come into contact with us (**you or your**).

The kinds of personal information we collect and hold may include: information about your health and other sensitive information; your name, address, phone number, and e-mail address; your date of birth; your geographic location; your debit or credit card details; and any other information you provide to us when you use our website or our services (including which of our pages or other webpages you have visited).

## How we collect personal information

We will generally collect personal information about you directly from you, including where you have submitted a microbiome request, responded to our online survey(s) or questionnaire(s), or provided us with samples. We may also collect personal information about you by way of forms and other documents or information that you submit to us (whether in paper or electronic form), correspondence you provide to us and telephone calls or meetings with you.

If we are unable to collect personal information about you, we may be unable to provide you with some or all of our services.

## Purposes of collection

The personal information we collect and hold about you depends on your interaction with us. Generally, we will collect, hold and use personal information about you if it is directly related to, or reasonably necessary for, the performance of our functions and activities and for the purposes of:

- a) providing you with our services (including, where applicable, by providing you with a microbiome profile generated using the sample you may supply to us);
- b) answering any questions or inquiries you direct to us;
- c) facilitating our internal business operations, including the fulfilment of any legal requirements;

- d) for other purposes which are reasonably necessary in connection with our normal functions and activities;
- e) analysing our services and customer needs with a view to developing new or improved services; and
- f) as otherwise required or permitted by applicable laws and regulations.

If you participate in any research study or studies that we conduct from time to time, then we will collect, hold and use personal information about you for the purposes of that research study and as described in our **Participant Information Sheet**.

Except as otherwise permitted by law, we only collect sensitive information about you if you consent to the collection of the information and if the information is reasonably necessary for the performance of our functions, as set out above.

## How we use and disclose personal information

Generally, we will only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- a) service providers and partners, who assist us in operating our business;
- b) any industry body, tribunal and/or court in connection with any complaint made by you about us; and
- c) any other organisation or person with your consent or as permitted or required by law.

We may also disclose to Australia Post certain personal information you provide us (such as your email address, phone number and/or residential address) in connection with us providing our services to you (this information may be used by Australia Post for the purposes of providing notification of tracking events and collecting any relevant feedback in relation to the delivery or tracking service).

We do not typically or routinely disclose personal information to overseas recipients, although this may change over time. Unless we have your consent, or an exception under the APPs applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to your personal information.

## Referral Codes

We may enter referral arrangements with certain third parties that provide health-related services to their patients or clients (**Insights Practitioners**). Under these arrangements, the Insights Practitioner may be given a unique "**Referral Code**", which the Insights Practitioner can then provide to their patients or clients for their use in connection with the purchase of certain of our services.

If you have been provided with a Referral Code, and you decide to use it in connection with the purchase of our services, we may:

- a) disclose the Microbiome Report produced with respect to those services (if any), including the personal information contained in the Microbiome Report, to the Insights Practitioner associated with that Referral Code; and
- b) hold, access and use the Microbiome Report for the purposes of facilitating the delivery of the Microbiome Report to the Insights Practitioner and assisting them to interpret the Microbiome Report, in accordance with our Terms and Conditions of Use.

You may withdraw this consent at any time by contacting us using the contact details set out below.

---

## How we hold personal information

We hold personal information in different ways, including in paper form, electronic form and/or in other mediums. While we have taken steps that are reasonable in the circumstances to protect the personal information we hold from misuse, interference and loss and from unauthorised access, modification or disclosure, we cannot guarantee that such misuse, interference, loss, or unauthorised access, modification or disclosure will not occur.

---

## Direct marketing communications

We will not use personal information about you for direct marketing without your consent.

---

## Cookies

A cookie is a data file that a website transfers to your computer. This enables the website to track the pages you have visited. A cookie only contains information you supply. It cannot read data on your computer. There are many types of cookies that may be used for different purposes. For example, some cookies help a website to remember information about your visit, like your preferred language and other settings while others may identify which pages are being visited or offer security features. Our website uses cookies. You can set your browser to refuse cookies, however, this may mean you are unable to take full advantage of our website or our services.

---

## How to obtain access to your personal information

You may access the personal information we hold about you, upon making a written request using the contact detail set out below. We will respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making the request for access).

We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will give you a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

If, upon receiving access to your personal information or at any other

time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

You may, by using the contact details set out below, notify us in writing that you have withdrawn your consent for us to use some or all of your personal information that we hold (which may include your health information). Upon receiving such notification from you, we will take such steps as are reasonable in the circumstances to destroy or de-identify your personal information that is the subject of your notification (in such manner determined by us). Please be aware that if we destroy or de-identify some or all of the personal information about you, we may be unable to provide you with some or all of our services.

If we refuse to correct, destroy or de-identify your personal information, for example where we are required to retain the information under Australian law, we will give you a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

---

## How to make a complaint about a breach of your privacy rights by us

If you wish to make a complaint about a breach of the Privacy Act, the APPs or a privacy code that applies to us, please contact us using the details below and we will take reasonable steps to investigate the complaint and respond to you.

---

## Anonymity and pseudonyms

You have the option of not identifying yourself or using a pseudonym when dealing with us in relation to privacy matters unless we are required by law or a court/tribunal to deal with individuals who have identified themselves or it is impractical for us to deal with you if you have not identified yourself in the circumstances.

---

## Changes to this policy

We may, from time to time and with or without notice, review and update this privacy policy to take account of new laws and technology, changes to our functions and activities, and to make sure it remains appropriate. We recommend you visit our website regularly to keep up to date with any changes.

---

## Contact us

Please direct all queries and complaints in relation to your privacy or this privacy policy to: Privacy Officer, Microba Pty Ltd, GPO Box 469, Brisbane QLD 4001, Phone: 1300 974 621, e-mail address: info@microba.com.