

1 Purpose

This document has been prepared with the intent to outline the philosophy and methodology adopted by SAVI Surgical in dealing with the information it collects from clients and individuals in accordance with the Australian Privacy Principles.

1.1 Legislative Requirement

This Privacy Policy (Policy) has been prepared in accordance with the requirements of the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012. The Policy adopts the 13 Australian Privacy Principles prescribed in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protect) Act 2012 (the Act).

SAVI Surgical places the highest priority on the protection of an individual's privacy and the security and use of personal information.

SAVI Surgical has developed this policy to regulate the management of personal information it collects and uses. The Policy seeks to ensure that the appropriate measures are implemented to manage the collection, use and protection of personal information held by SAVI Surgical.

2 Australian Privacy Principles (APPs)

2.1 APP 1 - Open and transparent management of personal information

2.1.1 The kinds of personal information that SAVI Surgical collects and holds

SAVI Surgical may collect and hold information, including sensitive and/or personally identifiable information in the course of performing its usual activities and functions. This information may include, but is not limited to:

- Information pertaining to an individual's identity, including full name and date of birth
- Contact information, including residential and postal address(es), telephone numbers and email addresses
- Account and/or membership numbers of individuals i.e. uniquely identifiable strings utilised to identify an individual on a particular third party service

SAVI Surgical may also receive information from clients (and subsequently hold the information), including sensitive and/or personally identifiable information, with the purposes of providing services to a particular client. It is acknowledged that this information is received via the client, and not the individual with which the information directly relates to.

2.1.2 How SAVI Surgical collects and holds personal information

SAVI Surgical generally collects and holds sensitive and/or personal information in the course of engaging with its clients and through the purpose of conducting its usual activities.

2.1.3 Complaints

Complaints about a breach of the Australian Privacy Principles or any associated privacy matters, may be sent to SAVI Surgical via one of the following means:

In writing: Level 9, 410 Ann St, Brisbane, Queensland 4000, Australia

Email: hello@savisurgical.com

SAVI Surgical will process the complaint according to its complaints procedure, and endeavour to respond to the complaint and perform investigations within a reasonable timeframe after the complaint is made.

2.2 APP 2 - Anonymity and Pseudonymity

When engaging with SAVI Surgical in relation to a particular matter, individuals have the option of not identifying themselves, or of using a pseudonym, where it is practical and lawful to do so.

SAVI Surgical will take all means available to engage with individuals who have chosen to not identify themselves, or who have used a pseudonym, however it is acknowledged that given the activities undertaken by SAVI Surgical, it may be impractical to appropriately assist an individual who has chosen to not identify themselves or who have used a pseudonym.

2.3 APP 3 - Collection of Personal Information

2.3.1 Personal information other than sensitive information

SAVI Surgical will not collect personal information (other than sensitive information) unless the information is reasonably necessary for SAVI Surgical to carry out its usual functions or activities.

2.3.2 Sensitive Information

SAVI Surgical will not collect sensitive information about an individual unless the individual consents to the collection of the information and the information is reasonably necessary for SAVI Surgical to conduct its usual functions or activities. SAVI Surgical acknowledges that exceptions may apply where the collection of sensitive information is required and/or authorised by or under an Australia law or a court/tribunal order.

2.3.3 Functions and activities of SAVI Surgical

Functions and activities that SAVI Surgical may engage in, in relation to a particular individual, include but are not limited to:

- Where SAVI Surgical is collecting information for administrative purposes, business, employment and recruitment purposes, SAVI Surgical may collection information that includes an individual's photo, name, birth date, address, email address, contact details, tax file number, financial information (such as credit card details) and an individual's criminal record;
- Where SAVI Surgical is collecting information for the purposes of maintaining contact with its clients, with the view to keep clients informed of its services, to keep its clients updated on industry developments that it deems may be of interest to them, to

keep its clients updated on events we are holding; or to otherwise perform business-to-business direct marketing activities, the information it collects may include photos, individuals' names, job titles, email addresses and contact details; and

- Where SAVI Surgical is receiving information for the purposes of rendering services to its clients, the information received will depend on the information provided by the client, and the purpose(s) for which it is needed. This information may include, photos, names, postcodes, addresses, dates of birth, email addresses, membership numbers and other information related directly to SAVI Surgical's clients' products and services being offered to the members of said client. In the event that SAVI Surgical may receive any personal information (including situations where information received is capable of re-identification of an individual), and the information is deemed unnecessary to render the services SAVI Surgical has been engaged to supply, we will notify the client and take the necessary steps to destroy the information.

2.3.4 Means of collection

SAVI Surgical will only collect personal information by lawful and fair means. Whenever reasonable, and practical to do so, SAVI Surgical will only collect personal information about an individual, directly from that individual. However, SAVI Surgical acknowledges that some information may be obtained or provided to SAVI Surgical from an individual's employer, service provider or similar, in the course of SAVI Surgical performing its usual functions and activities.

When information is received with the purposes of providing services to a particular client, it is acknowledged that this information is received via the client, and not the individual with which the information directly relates to. In these situations, SAVI Surgical relies on the client that the information is received from to obtain consent from the relevant individuals to disclose the information provided to SAVI Surgical. Furthering this, SAVI Surgical has developed a set of practices and policies designed to satisfy SAVI Surgical's own standards to ensure that such consents have been adequately and properly obtained by the client(s) in question. This may include, but is not limited to, obtaining and regularly reviewing the privacy policies of SAVI Surgical's clients, engaging in discussions with the clients) regarding their permitted use of personal information they hold on individuals, and executing contractual agreements from the client(s) that the information provided to SAVI Surgical on an individual is provided and used in a manner that is consistent with the consent given by the individual.

2.4 APP 4 - Dealing with Unsolicited Personal Information

In the event that SAVI Surgical receives personal information and SAVI Surgical did not request that information (unsolicited information), SAVI Surgical will, within a reasonable period of time after receiving the information, make a determination as to whether or not SAVI Surgical could have collected the information under Australian Privacy Principle 3, if SAVI Surgical had solicited the collection of the information in question.

Upon determining that the information could not have been collected under Australian Privacy Principle 3, SAVI Surgical will as soon as practicable, and only in the event that it is lawful and reasonable to do so, destroy the information or ensure that the information is de-identified.

SAVI Surgical acknowledges that through the course of conducting its usual functions and activities, may receive personal and sensitive information about individuals that is unsolicited and not required for SAVI Surgical to perform services it is engaged for. SAVI Surgical has implemented policies, as well as automated and manual processing to identify the presence of this unsolicited personal information, and where necessary, will de-identify or redact that information. Additionally, in the event that this information has been provided on-behalf of an individual by a service provider or similar that SAVI Surgical is providing services to, SAVI Surgical will take steps to notify the client of the presence of this information. SAVI Surgical makes the identification of unsolicited personal information the responsibility of all staff members, and provides regular training to assist in this process.

2.5 APP 5 - Notification of the Collection of Personal Information

At or before the time, or if that is not practicable, as soon as practicable after, SAVI Surgical collects personal information about an individual, SAVI Surgical will take such steps as are reasonable in the circumstances, to advise the individual:

- The identify and contact details of SAVI Surgical
- The fact that SAVI Surgical has collected the personal information and the circumstances of that collection
- The purposes for which SAVI Surgical collects the personal information
- The main consequences (if any) for the individual if SAVI Surgical does not collect some or all of the individuals' personal information
- The name of any other entity subject to the Privacy Act, body or person, or the types of any other such entities, bodies or persons, to which SAVI Surgical, in the course of its usual activities and functions, may disclose personal information of the kind collected by SAVI Surgical.
- That SAVI Surgical's Privacy Policy contains information about how the individual may access the personal information about the individual that is held by SAVI Surgical, and if necessary, that the individual may seek the correction of such information.
- That SAVI Surgical's Privacy Policy contains information about how the individual may complain about a breach of the Australian Privacy Principles and how SAVI Surgical will deal with such a complaint
- Whether SAVI Surgical is likely to disclose the personal information to overseas entities, bodies or persons, and if so, the countries in which such recipients are likely to be located if it is practicable to specify those countries in the notification, or to otherwise make the individual aware of them
- If the collection of the personal information is required or authorised by or under an Australian law or a court/tribunal order, the fact that the collection is so required or authorised (including the name of the respective Australian law, or the details of the court/tribunal order, that requires or authorises the collection).

2.6 APP 6 - Use or Disclosure of Personal Information

Information about an individual that SAVI Surgical collects for a particular purpose (the primary purpose), will not be used or disclosed for another purpose (the secondary purpose) unless the individual has consented to the use or disclosure of the information. The primary purpose in relation to SAVI Surgical, is performing analytical and various IT services either directly for an individual or indirectly for an individual, on-behalf of its clients.

SAVI Surgical utilises the services of a number of specialist service providers to assist in the various activities and functions of SAVI Surgical. SAVI Surgical appoints these service providers in accordance with its supplier management procedure. External service providers are subject to the same Australian Privacy Principles as SAVI Surgical and are required to confirm that they have the appropriate mechanisms and controls in place to maintain and enforce their own privacy policies.

The consent of the individual to the use or disclosure of information other than for the primary purpose may not be required where:

- The individual would reasonably expect SAVI Surgical to use or disclose the information of the secondary purpose is:
 - If the information is sensitive information - directly related to the primary purpose; or
 - If the information is not sensitive information - related to the primary purpose
- The use or disclosure of the information is required or authorised by or under an Australian law or court/tribunal order
- A permitted general situation (as defined in section 16A of the Privacy Act) exists in relation to the use or disclosure of the information by SAVI Surgical
- A permitted health situation (as defined in section 16B of the Privacy Act) exists in relation to the use or disclosure of the information by SAVI Surgical
 - In such a situation, SAVI Surgical will take reasonable steps in the circumstances to ensure that the information is de-identified before disclosure
- SAVI Surgical reasonably believes that the use or disclosure of the information is reasonably necessary for one or more of the enforcement related activities conducted by, or on behalf of, an enforcement body. In such cases, SAVI Surgical will make a written note of the use or disclosure.

2.7 APP 7 - Direct Marketing

SAVI Surgical will not use or disclose personal information for the purpose of direct marketing except where:

- SAVI Surgical collected the information from the individual; and
- The individual would reasonably expect SAVI Surgical to use or disclose the information for the purpose of direct marketing; and
- The information is not sensitive information.

Unless the individual requests otherwise, SAVI Surgical may, from time to time, use personal information to:

- Conduct research to find out views on existing or proposed products and services; or
- Provide information on the various products and services offered by SAVI Surgical and its associated brands.

SAVI Surgical will ensure that, at all times, there is a simple means available by which an individual may easily request not to receive direct marketing communications from SAVI Surgical. Upon receiving such a request, SAVI Surgical will immediately cease to use or disclose personal information for the purpose of direct marketing.

Individuals that do not wish to receive direct marketing communications should advise SAVI Surgical via one of the following means:

In writing: Level 9, 410 Ann St, Brisbane, Queensland 4000, Australia

Email: hello@savisurgical.com

SAVI Surgical will never disclose an individual's personal information to a third party for the purposes of direct marketing unless that individual has given their express consent for such disclosure and use.

2.8 APP 8 - Cross-border Disclosure of Personal Information

SAVI Surgical will not disclose personal information about an individual to a person or organisation that is not based in Australia or one of its territories, without taking reasonable steps to ensure that the overseas recipient does not breach Australian Privacy Principles in relation to the information being provided.

SAVI Surgical may disclose personal information to an overseas recipient in one or more of the following circumstances:

- The overseas recipient of the information is subject to conditions and controls that have the effect of protecting the information in a way that is at least substantially similar overall to the way in which Australian Privacy Principles handles and protects the information. Further, there must be mechanisms that the individual can access to take action to ensure, and enforce that protection.
- The individual is informed that, through SAVI Surgical's normal activities and functions, information may be disclosed to an overseas recipient and consents to that disclosure.
- The disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order
- A permitted general situation (as defined in section 16A of the Privacy Act) exists in relation to the disclosure of the information

2.9 APP 9 - Adoption, Use or Disclosure of Government-related Identifiers

2.9.1 Adoption of government-related identifiers

SAVI Surgical will not use a government-related identifier of an individual, as its own method of identifying the individual.

2.9.2 Use or disclosure of government-related identifiers

SAVI Surgical will not use or disclose a government-related identifier of an individual unless:

- The use or disclosure of the identifier is reasonably necessary for SAVI Surgical to verify the identity of the individual for the purposes of SAVI Surgical's activities or functions; or

- The use or disclosure of the identifier is reasonably necessary for SAVI Surgical to fulfil its obligations to a Government agency or a State or Territory authority; or
- The use or disclosure of the identifier is required or authorised by or under an Australian law or a court/tribunal order; or
- A permitted general situation (other than the situation referred to in item 4 or 5 of the table in subsection 16A(1) of the Act) exists in relation to the use or disclosure of the identifier; or
- SAVI Surgical believes that the use or disclosure of the identifier is reasonably necessary for one or more enforcement-related activities conducted by, or on behalf of, an enforcement body.

2.10 APP 10 - Quality of Personal Information

SAVI Surgical will ensure that steps taken (if any), are as reasonable given the circumstances, to ensure that the personal information collected by SAVI Surgical is accurate, up to date, and complete in its nature.

Additionally, SAVI Surgical will ensure steps are taken (if any), are as reasonable given the circumstances, to ensure that the personal information that SAVI Surgical uses, or discloses, is, having regard to the purpose of use or disclosure, accurate, up-to-date, complete and relevant.

2.11 APP 11 - Security of Personal Information

Ensuring the security of an individual's personal information is of the highest importance to SAVI Surgical, and is core to all functions. SAVI Surgical will take such steps as are reasonable given the circumstances, to protect the personal information it collects from misuse, interference, and loss, and from unauthorised access, modification or disclosure. SAVI Surgical stores all records in the secured offices of SAVI Surgical, or with one of its appointed service providers, or in an electronic form which has a level of protection meeting the standards appropriate for its classification.

Where SAVI Surgical holds personal information about an individual, and:

1. SAVI Surgical has determined the information is no longer required for any purpose for which the information may be used or disclosed by SAVI Surgical, and
2. The information is not contained in a Commonwealth Government record, and
3. SAVI Surgical is not required by, or under an Australian law, or a court/tribunal order, to retain the information,

SAVI Surgical will take such steps as are reasonable given the circumstances, to destroy the information or to ensure it is de-identified.

2.12 APP 12 - Access to Personal Information

Where SAVI Surgical holds personal information about an individual, SAVI Surgical will, upon receiving a request for access from that individual, provide the requested information. Such a request can be made via the relevant contact or support sections on the platforms provided by SAVI Surgical, via email (hello@savisurgical.com), and/or via SAVI Surgical's publicly accessible website (<https://www.savisurgical.com/>). SAVI Surgical will undertake

reasonable steps to verify the identity of the individual before providing access to any personal information.

Where SAVI Surgical receives and holds individual personal information from a client, SAVI Surgical will direct any requests for access and/or change to the said client, and will action any changes that is approved by the client.

2.12.1 Denying access to information

SAVI Surgical may deny access to personal information where:

- SAVI Surgical has reason to believe that providing access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- Providing access would result in an unreasonable impact upon the privacy of other individuals; or
- SAVI Surgical receives a request that is frivolous or vexatious in its nature; or
- The information requested relates to, or is anticipated to relate to, legal proceedings between SAVI Surgical and the individual, and would not be accessible by the process of discovery in those proceedings; or
- Providing access to the requested information would reveal the intentions of SAVI Surgical with regards to negotiations with the individual in such a way as to prejudice those negotiations; or
- Providing access would be unlawful; or
- SAVI Surgical is authorised or required by or under an Australian law or a court/tribunal order; or
- Both of the following apply:
 - SAVI Surgical has reason to suspect that unlawful activity, or misconduct of a serious nature, relating to SAVI Surgical's functions or activities has been, is actively being, or may be engaged in; and
 - SAVI Surgical providing access would likely result in prejudicing the process of taking appropriate action in relation to the matter; or
- Providing access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- Providing access would reveal evaluative information generated within SAVI Surgical in connection with a commercially sensitive decision-making process.

2.12.2 Providing access to information

SAVI Surgical will endeavour to respond to a request for access within a reasonable timeframe after the request is made. SAVI Surgical will take all means, where practical and reasonable to do so, to provide access in the manner requested by the individual.

In the event that SAVI Surgical declines to give access to the personal information as a result of one or more of the conditions outlined in the previous section, or declines to give access in the manner outlined in the request from the individual, SAVI Surgical will undertake steps (if any), with respect to being reasonable in the circumstances, to provide access in a way that meets the requirements of the entity and the individual. If required, this may include providing access through the use of a mutually agreed intermediary. Upon refusing a request for access to information, SAVI Surgical will provide the individual with:

- The reasons for the refusal, except to the extent that, with regards to the grounds for refusal, it would be unreasonable to do so; and
- The processes available for lodging a complaint regarding the refusal for access to information; and
- Any other information SAVI Surgical is required to provide by law.

Where SAVI Surgical imposes a charge for an individual to access personal information, the charge will be of a reasonable nature, and will not relate to the lodging of the request for information.

2.13 APP 13 - Correction of Personal Information

Where SAVI Surgical holds personal information about an individual, and it is discovered that, having regard to a purpose for which the information is held, the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, or a request is received (from the individual whom the information relates to) to correct the information, SAVI Surgical will take such steps (if any) as are reasonable given the circumstances to correct that information and ensure that it is accurate, up-to-date, complete, relevant and not misleading. Where SAVI Surgical receives and holds individual personal information from a client, SAVI Surgical will direct any requests for correction to the said client, and will action any corrections that is approved by the client.

In the event that SAVI Surgical corrects personal information relating to an individual that SAVI Surgical has previously disclosed to another party, and the individual in question requests that SAVI Surgical notify the other party of the correction, SAVI Surgical will take appropriate steps (if any), that are reasonable given the circumstances, to give notification to the other party unless it is impractical or unlawful to do so.

In some situations, where appropriate, SAVI Surgical may request that the individual making the request for correction provides suitable evidence that the information subject to correction is inaccurate, out of date, incomplete, irrelevant or misleading.

SAVI Surgical, if it refuses to correct the personal information as requested by the individual, will provide the individual with a written notice that details:

- The reason(s) for the refusal, except to the extent that it would be unreasonable to do so; and
- The processes available to the individual to lodge a complaint about the refusal; and
- Any other information SAVI Surgical is required to provide by law.

SAVI Surgical, in the event it refuses to correct the personal information as outlined in the request from the individual, and the individual requests that SAVI Surgical associates with the information a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading, SAVI Surgical will undertake such steps as are reasonable given the circumstances to associate the statement in such a manner as to make the statement apparent to users of the information.

SAVI Surgical will endeavour to handle a request to correct personal information within a reasonable timeframe after the request is made, and will not charge the individual for lodging the request, for correcting the personal information detailed in the request, or for associating the statement with the personal information (if required).

3 Document Control

3.1 Change History

Version	Version Description	Date Published	Author
1	Initial version for SAVI Surgical.	09 Feb 2024	Khim Nyang Tan