

## 1. Purpose

- 1.1 B. Braun Australia is committed to a trust-based cooperation with all parties whom we deal with; such as our customers, healthcare professionals, consultants, contractors, employees, etc. Keeping information secure, in particular personal or confidential information, is an aspect of this trust which we take seriously.
- 1.2 This policy reinforces the company's commitment to ensure compliance with the Privacy Act (1988) and the Australian Privacy Principles (APP's). The policy also outlines the arrangements intended to ensure the protection of personal and confidential information.
- 1.3 In this policy, we seek to inform the reasons why information may be collected and processed, as well as the right to access and the right to refuse to provide such information.
- 1.4 Within the B. Braun Group, compliance with legal requirements is continually monitored.

## 2. Scope

- 2.1 The policy is applicable to all employees of B. Braun Australia.

## 3. References

<a href="http://www.oaic.gov.au/privacy/privacy-act/the-privacy-act">http://www.oaic.gov.au/privacy/privacy-act/the-privacy-act</a>	The Privacy Act (1988)
<a href="http://www.oaic.gov.au/privacy/privacy-act/australian-privacy-principles">http://www.oaic.gov.au/privacy/privacy-act/australian-privacy-principles</a>	Australian Privacy Principles (2014)
<a href="http://www.accc.gov.au/">http://www.accc.gov.au/</a>	Australian Competition and Consumer Commission
<a href="http://www.bbraun.com/cps/rde/xchg/bbraun-com/hs.xsl/13823.html">http://www.bbraun.com/cps/rde/xchg/bbraun-com/hs.xsl/13823.html</a>	B. Braun Group Code of Conduct

## 4. Responsibilities

- 4.1 The Senior Management Team has adopted this policy and will exercise reasonable oversight with respect to the implementation and effectiveness of the policy.
- 4.2 All Employees are committed to create and maintain a work environment, and conduct their business interactions, in accordance with this policy.
- 4.3 The Legal & Compliance Officer shall be the appointed person to address all queries regarding the policy, as well as periodically reviewing and updating the policy.
- 4.4 Corporate Communications are responsible for internally broadcasting the policy to Employees, and making the policy available to the general public on the company website.

<b>Written By:</b>		<b>Approved By:</b>	
<i>Signature on Master Document</i>		<i>Signature on Master Document</i>	
<i>General Manager – Human Resources &amp; Business Administration</i>		<i>Managing Director</i>	
<i>R &amp; C.C.</i>	New policy aligned to the revised APP's, effective 22-June-2015		

## 5. Definitions

5.1	The Act	-	Australian Privacy Act of 1988
5.2	APP	-	Australian Privacy Principles
5.3	Data subjects	-	individuals whose data is being processed
5.4	Company/B. Braun Australia	-	B. Braun Australia Pty Ltd
5.5	B. Braun Group	-	B. Braun Melsungen AG and its subsidiaries wheresoever located

## 6. Notice and Choice

- 6.1 During the conduct of normal business, everyone has the right to make a choice not to provide their personal information and may revoke their consent to the collection and processing of personal information.
- 6.2 However, it is important to be aware that certain services provided by B. Braun Australia, and the continuation thereof, may require the processing of such data.

## 7. Data Protection Principles

- 7.1 The process by which we gather, process and use the personal information of a data subject is in compliance with the Act, as well as the data protection regulations of the Federal Republic of Germany, and the European Union.
- 7.2 This policy applies to data, including personal information which B Braun Australia collects about a data subject. Personal information may be individual data, or sourced from a combination of individual data, by which data subject can be identified.
- 7.3 B. Braun Australia will not pass on the personal information of a data subject to third parties outside of the B. Braun Group of companies without the data subject's consent.

## 8. Categories of Personal Information

- 8.1 The nature and type of data collected by B. Braun Australia, and the source of such data, varies depending on the nature of the business relationship with the data subject, and this may include:-
- 8.1.1 personal information collected from the Company website, if such data has been voluntarily provided or where such data is required for the purposes of providing a service which a data subject requires.
  - 8.1.2 personal information collected on application forms or other information forms such as name, address, email, telephone, occupation, income.
  - 8.1.3 personal information from credit bureau reports and credit reporting agencies.
  - 8.1.4 personal information from governmental agencies.
- 8.2 Unless we specifically request or invite it, we ask that you not send us, and you not disclose, any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) on or through any of our websites or otherwise to us.

- 8.3 In those cases where we may request or invite you to provide sensitive information, we will do so with your express consent.

## 9. Purpose of Collecting Personal Information

- 9.1 Personal information is used to provide products and services, and to inform about products and services offered by the B. Braun Group, and may include:-
- 9.1.1 for the purposes of technical administration of our website,
  - 9.1.2 statistical analysis,
  - 9.1.3 developing new products and services,
  - 9.1.4 registration for programs or offers upon your request,
  - 9.1.5 providing services offered to you,
  - 9.1.6 payment processing for purchases,
  - 9.1.7 protection against or identifying possible fraudulent transactions,
  - 9.1.8 where permitted by law, to supply customized, unsolicited offers and information about the B. Braun Group and services provided by B. Braun Australia,
  - 9.1.9 developing and providing advertising adapted to our customers,
  - 9.1.10 profiling and determining service preferences,
  - 9.1.11 finance and marketing operations and/or as required by the terms and conditions of business and other business administration purposes including credit monitoring and control purposes,
  - 9.1.12 to meet regulatory and legal requirements,
  - 9.1.13 for risk management,
  - 9.1.14 for all other purposes incidental and associated with the above.
- 9.2 Personal information is also collected for Human Resources purposes including:-
- 9.2.1 to establish a relationship between B. Braun Australia and an employee or potential employee,
  - 9.2.2 to process applications for employment,
  - 9.2.3 for evaluation and due diligence purposes and to assess suitability for employment or continued employment,
  - 9.2.4 processing of payroll payments as well as for credit control and collection purposes of any sums which may become due from an employee or former employee to the Company,
  - 9.2.5 for employment history and records,
  - 9.2.6 for data processing purposes,
  - 9.2.7 to evaluate and monitor provision of employee services,
  - 9.2.8 to respond to inquiries from regulatory authorities, certification and notified bodies,
  - 9.2.9 for insurance purposes,
  - 9.2.10 profiling references and job suitability,
  - 9.2.11 for enforcement of the Company's rights or the rights of other B. Braun Group companies and corporations against an employee or former employee,
  - 9.2.12 to meet legal and regulatory requirements,
  - 9.2.13 for such other purposes as permitted by applicable law or with employee consent,
  - 9.2.14 for all other purposes incidental and associated with any of the above.

## 10. Disclosure of Personal Information

- 10.1 Personal information will be kept confidential but may be disclosed to the following categories of parties for the purposes set out:-
- 10.1.1 to any B. Braun Group companies in and outside of Australia,
  - 10.1.2 to our advisers, including consultants, advocates and solicitors for purposes of determining our rights and enforcing any agreement with data subjects,
  - 10.1.3 any agent, contractor or service provider to whom we may have outsourced services, subject always that such parties acknowledge the confidentiality and rights of the data user and to comply with the provisions of the Act.
  - 10.1.4 to regulatory authorities or notified bodies including bodies providing quality certification of our products upon their request,
  - 10.1.5 to such other parties as may be permitted by law.

## 11. Data Subject's Rights

- 11.1 Under the Act, a data subject has the right to access personal information which an organization holds about the data subject. At a data user's request, we will inform the data user in writing, in accordance with applicable law, whether we have stored any personal information and if so, the data.
- 11.2 Data users have a right to correct and block such personal information. Data users may also withdraw consent to the processing and storage of personal information, if not needed for legal reasons or for processing an existing contractual relationship. Data may also be deleted if such data is no longer subject to retention policies.
- 11.3 All requests are to be made to the Company via email ([info.au@bbraun.com](mailto:info.au@bbraun.com)) and marked to the attention of the Compliance Officer.
- 11.4 In order to assist us in validating the identity of any person requiring access, we will ask for verification documents to substantiate identity.

## 12. Protection of Minors

- 12.1 As a general rule, children and persons under the age of 18 years should not disclose personal information to us without the consent of their parents or guardians.
- 12.2 The Company does not solicit personal information from children and we do not knowingly collect personal information from children, use said data in any way or disclose said data to third parties without authorization.

## 13. Online Data Transmission

- 13.1 The Internet is a global platform. By using our websites, or communicating with us electronically via contact forms, you agree to the unencrypted transfer of all data that you want to send us.

- 13.2 Due to the nature of operations on the Internet, and the inherent systemic risks, all data transfers initiated by you, occur at your own risk. The only exception to this is if the Company offers you an encrypted transmission path.

## 14. Security Measures

- 14.1 We have taken extensive precautions to ensure the security of your data. Your personal information, as stored by us, which you for example have entered on HTML pages (contact forms), are transferred in an encrypted format (SSL – Secure Socket Layer) over the public data network to our Internet service provider.
- 14.2 The data is then forwarded to the respective data processing systems of the B. Braun companies responsible for the triggered transactions, or to the appropriate contractual partners of B. Braun, and placed into storage.

## 15. Links

- 15.1 This data protection policy applies to all data gathered and processed by the Company. In rare cases, the B. Braun Group Internet sites link directly to the websites of another party, for which the respective party itself is then responsible. However, any switching of this kind to external websites will be clearly announced to you in advance.
- 15.2 We accept no responsibility for the handling of your data by the operators of other websites. When you exit B. Braun Group Internet sites, we therefore recommend that you ask all operators of the linked websites for their data protection policies.

## 16. Cookies and etracker

- 16.1 Cookies are small text files stored locally by the site visitor's web browser. Cookies are a common feature on almost all websites; enabling us to make our Internet site as convenient as possible for you to use. If you reject the use of cookies (this is an optional setting in your browser), you can still use our website (although some restrictions might apply).
- 16.2 The Company website uses technologies provided by etracker GmbH (<http://www.etracker.de>) to collect and store data which have been made anonymous. Cookies, which collect and store data exclusively in pseudonymous form, may be utilized for this purpose. Based on this data, usage profiles are created under a pseudonym. The data are not used to personally identify any visitor to this website and are not merged with the data relating to the holder of the pseudonym. You can object to this data being collected and stored at any time; this objection will then continue to apply in the future.

## 17. AddThis

- 17.1 B. Braun uses AddThis in order to make it easier for visitors to set bookmarks and share interesting content on the social web. Information about the privacy policy of AddThis is available in the AddThis privacy policy. B. Braun does not collect or store any personal information that is sent to the AddThis service.

## 18. Data Protection: Access & Contact

- 18.1 This policy can be viewed and printed from the Company's website via the "Privacy Policy" link.
- 18.2 If you have any questions regarding the processing of your personal information, please contact the Company via the following:

E-mail us at: [info.au@bbraun.com](mailto:info.au@bbraun.com)

or write to us at:

B. Braun Pty Ltd  
Norwest Business Park  
Level 5, 7-9 Irvine Place,  
Bella Vista NSW 2153  
Australia

Attention: Compliance Officer

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