

PRIVACY POLICY

Reviewed: 14th May 2026

1 GENERAL

Stratos MedTech Pty Ltd ACN 668 737 022 (referred to in this document as **we, us or our**) recognises that your privacy is very important, and we are committed to protecting the personal information we collect from you. The *Privacy Act 1988* (Cth) (**Privacy Act**), relevant privacy principles and privacy codes (if any) govern the way in which we must manage your personal information. This policy sets out how we collect, use, disclose and otherwise manage your personal information.

2 COLLECTION

2.1 Types of information collected

We may collect and hold personal information about you, that is, information that can identify you, and is relevant to providing you with the services you are seeking. We may also collect and hold sensitive information about you, including information about your health.

2.2 Purpose of collection

2.2.1 Personal information

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

- a) providing services, including the provision of clinical care to you;
- b) providing you with information about other services that we, our related entities and other organisations that we have affiliations with, offer that may be of interest to you;
- c) facilitating our internal business operations, including the fulfilment of any legal requirements;
- d) facilitating reimbursement of services by payors (e.g., insurance companies) that we have affiliations with;
- e) analysing our services and customer needs with a view to developing new or improved services;
- f) providing health service management and quality assurance to other organisations that we have affiliations with;
- g) providing population health management data to organisations that we have affiliations with;
- h) supporting research and market studies in the health care field; and
- i) providing similar healthcare services to persons located overseas including in the United States, Europe, Brazil and South East Asia.

2.2.2 Sensitive information

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.

2.3 Method of collection

2.3.1 Personal information

Personal information will generally be collected directly from you through the use of any of our standard forms, over the internet, through use of the software, via email, or through a telephone conversation with you. There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

2.3.2 Sensitive information

Except as otherwise permitted by law, we only collect sensitive information about you with your consent. Sensitive information about you will be collected directly from you using our standard forms, over the internet, through use of the software, via email, or through a telephone conversation with you.

2.3.3 Failure to provide information

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else you know, with the services you, or they, are seeking.

2.3.4 Internet users

If you access our website, we may collect additional personal information about you in the form of your IP address and domain name.

Our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view so that we may serve you more effectively.

Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

3 USE AND DISCLOSURE

3.1 Personal information

Generally, we 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) your nominated clinician;
- b) service providers, who assist us in operating our business, and these service providers may not be required to comply with our privacy policy;
- c) our related entities and other organisations with whom we have affiliations so that those organisations may provide you with information about services and various promotions;
- d) government agencies;
- e) third-party administrators such as health insurers for reimbursement services;
- f) our related entities and other organisations with whom we have affiliations with so that those organisations may provide other persons with similar health care services located in the United States, Europe, Brazil and South East Asia.

The law also permits us to use or disclose personal information for other purposes in certain circumstances.

3.2 Sensitive information

Except as otherwise permitted by law, we only disclose your sensitive information with your consent, for the purposes for which it was collected, and to the parties described above.

4 SECURITY

We store your personal information and sensitive information in different ways, including in paper and in electronic form. The security of your personal information and sensitive information is important to us. We take all reasonable measures to ensure that your personal information and sensitive information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

Your personal and sensitive information will be stored in servers located in Australia, and may in the future be stored in servers located in the United States, Europe, Brazil and South East Asia for the purposes set out above. We take reasonable steps to ensure that the overseas recipient complies with relevant privacy principles in relation to your personal information and sensitive information.

Your personal and sensitive information will be retained for a period of at least 10 years after the last data entry and/or use of the PeriCoach System. At this point the data may be permanently de-identified once it is no longer needed for the purpose outlined above.

5 ACCESS

You may access the personal information and sensitive information we hold about you, upon making a written request. We will try to acknowledge your request within 14 days of its receipt, and to provide you with access to the information requested within 30 days. We may charge you a reasonable fee for processing your request.

We may decline a request for access to personal information or sensitive information in circumstances prescribed by the Privacy Act, and if we do, we will provide you with 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 sensitive information or at any other time, you believe the personal information or sensitive 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. If you wish to make a complaint about a breach of the Privacy Act, please contact us and we will take reasonable steps to address the complaint.

You may request the deletion of personal or sensitive information by making a written request. We will try to acknowledge your request within 14 days of its receipt, and to provide you with access to the information requested within 30 days. We may charge you a reasonable fee for processing your request.

6 FEEDBACK

If you have any queries or concerns about our privacy policy or the way we handle your personal information or sensitive information, please contact our privacy officer at info@stratosmedtech.com

7 MORE INFORMATION

For more information about privacy in general, you can visit the federal privacy commissioner's website at www.privacy.gov.au