



## 1. Monash IVF Group's commitment to privacy

Monash IVF Group Limited and its related bodies corporate (**Monash IVF Group**), which includes Monash IVF, Repromed, Monash Ultrasound for Women and Sydney Ultrasound for Women, respects your right to privacy and is committed to managing your information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**), and other applicable privacy laws.

We understand the importance of being open and transparent with you in the way in which we collect, hold, store, use and share your personal information and we take protecting your privacy rights seriously.

This document sets out the way Monash IVF Group handles and protects your personal information (including health information and sensitive information) and provides information on your rights in relation to your personal information managed by Monash IVF Group. This document is referred to as our **Privacy Policy**.

We strongly encourage you to read this document, so that you understand and are comfortable with how we handle your personal information. If you have any questions about this Privacy Policy, or about Monash IVF Group's handling of your personal information, please contact us using the relevant contact details set out at the end of this Privacy Policy.

## 2. Collection of personal information

Our Privacy Policy is concerned with how we collect, hold, use and disclose personal information, including sensitive information and health information.

"Personal information" is defined in the Privacy Act, and means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

"Sensitive information" is defined in the Privacy Act, and includes health information about an individual, as well as an individual's genetic and biometric information (amongst other things).

"Health information" includes personal information or an opinion about an individual's health, illness, disability or injury, an individual's expressed wishes about the future provision of health services, or a health service provided or to be provided to an individual that is also personal information.

Sensitive information and health information are subsets of personal information.

Under applicable privacy legislation, sensitive information (including health information) is generally afforded a greater level of protection than other personal information.

In this Privacy Policy, where we use the terms "personal information", "sensitive information" and "health information", we are referring to these legal definitions.

# Privacy of your information policy

When information on an individual is de-identified or aggregated, it is no longer personal information, sensitive information or health information. This would include, for example, when information on the treatment outcomes of a number of individuals are added to a database without any way of identifying the individual patients.

## 3. Collection of personal information

The types of personal information we may collect about you include the following.

### **Personal and contact details**

This may include:

- full name;
- residential and postal address;
- email address;
- telephone number; and/or
- date of birth.

Where relevant, we may also collect information about your relationship status, interpreter requirements, the nature of your enquiry, event registrations and communication preferences.

### **Transactional and payment information**

Where relevant, we may collect billing-related information such as Medicare details, private health fund details and other payment-related information.

### **Health information**

Health information is generally considered to be more sensitive than other types of personal information.

This may include:

- information about your medical history;
- your reasons for seeking care or treatment with Monash IVF Group;
- clinical notes;
- test results;
- diagnostic reports;
- records or results from other healthcare providers; and/or
- information generated in the course of providing treatment or care to you (which may include relationship details, information about children or dependents and next of kin details).

This may also include genetic information about you or your family members where relevant to your care, as well as images or recordings created during treatment, such as ultrasound images or embryo development imagery.

### **Other types of information collected during our interactions**

This may include information that you provide to us related to our services, or otherwise in the course of your dealings with us.

# Privacy of your information policy

**Information collected from third parties**

Where relevant to the services we provide, we may collect information about you from third parties, including referring practitioners, affiliated healthcare professionals, hospitals, pathology and diagnostic imaging providers, and other healthcare providers involved in your care.

We may also receive information from contracted service providers and other organisations with whom we work in the ordinary course of providing our services.

**Website, cookie and pixel information**

When you use our websites or applications, we may collect online and digital services information. This may include:

- network and device information (such as your device's ID, type and IP address);
- geo-location information;
- browsing information, including information about how you interact with our websites and social media, pages you visit, what content you view and your session duration;
- web form inputs such as your name, postcode, email address and phone number;
- transaction data; and/or
- information collected from cookies and/or online tracking technologies (such as tracking pixels).

It may be the case that this information constitutes personal information, sensitive information and/or health information.

Specific details of the pixels and cookies used by Monash IVF Group and options available to you, are set out in more detail below.

Monash IVF Group may also collect other kinds of personal information that is reasonably necessary for Monash IVF Group to carry out its functions and activities for which we will notify you of at the time of collection.

In some cases, you may provide us with personal information which relates to another person (for example, your next of kin or your partner). If you do so, you agree that you have received permission from these individuals for us to collect, use, and disclose their personal information in accordance with this Privacy Policy. You should also let them know about our Privacy Policy.

Providing accurate and complete information is important for safe and appropriate healthcare. If you choose not to provide information that is relevant to your treatment, we may not be able to provide services, or the services provided may be less appropriate or effective. In some circumstances, this may pose risks to your health outcomes.



## 4. How we collect, store and use your personal information

Monash IVF Group collects, uses and stores your personal information, sensitive information and health information to provide our services, comply with our legal obligations, and support the effective operation of our business.

We may collect, use and disclose your information for the following purposes:

### **Providing care and treatment**

- Providing fertility, reproductive health and related healthcare services;
- Providing health advice and managing your treatment, including the storage and management of cryopreserved gametes, embryos and other reproductive material;
- Coordinating your care and facilitating your treatment journey by sharing relevant information with our doctors, nurses, counsellors and affiliated service providers, including day surgeries, pathology providers and ultrasound providers; and
- Making information available through My Health Record where required or authorised by law.

### **Managing our relationship with you**

- Responding to enquiries and communicating with you about our services;
- Verifying information you provide to us;
- Administering appointments, patient records and other aspects of your care; and
- Conducting customer satisfaction surveys and seeking feedback about our services.

### **Research, quality improvement and training**

- Undertaking data analysis, medical research and related research activities, including research conducted with approved collaborators, as described in this Privacy Policy; and
- Conducting training, quality assurance and quality improvement activities to improve the safety and quality of our services.

### **Regulatory and legal purposes**

- Complying with legal and regulatory obligations;
- Making mandatory or voluntary reports relating to identified health risks, diseases or other matters where required or authorised by law;
- Responding to court orders, subpoenas, regulatory requests and other lawful directions; and
- Meeting accreditation, audit and reporting requirements.

### **Billing and payment administration**

- Processing payments and managing accounts;
- Billing Medicare, private health insurers and other payers; and
- Undertaking debt recovery activities where necessary.

# Privacy of your information policy

**Marketing and service updates**

- Providing newsletters, service updates, event invitations, targeted advertising and information about products or services that may be of interest to you, where permitted by law.

**Job applications**

- For processing a job application if you have applied for a job with us.

## 5. Disclosure of information generally

We may share your personal information with third parties:

- for the purpose for which we collect it, as set out in section 4 of this Privacy Policy;
- for other purposes, if we notify you of such when we collect the information; or
- where we have otherwise received your consent, or the disclosure is required or authorised by law.

Some of the third parties we may share your personal information with includes the following:

**Recipient****Explanation****Members of the Monash IVF Group**

We may share your personal information across the Monash IVF Group, between members of the group (as appropriate).

For example:

- for admission to a Monash IVF Group Day Hospital
- for genetic screening performed in our Repromed Laboratory
- for ultrasounds performed by a Monash IVF Group provider
- for ART services provided
- for psychological support or genetic counselling from Monash IVF Group
- for feedback and adverse event investigation

**Our service providers, suppliers and advisors**

We may share your personal information with a variety of our service providers to assist us with providing, promoting, and managing our products and services. These may include our:

- IT service providers;
- marketing and communications agencies;
- data analysis organisations; and



- professional advisors and consultants (such as legal, insurance and financial advisors).]

**Other entities we do business with**

Clinical service providers, such as pathology providers, testing laboratories or other providers through referral for further care

Overseas donor banks, to track family limits and genetic information

Students who are undertaking placement in our clinics and are under appropriate confidentiality obligations.

Your referring doctor.

**Referees**

If you have applied for a job with us, we may share your personal information with your nominated referees to validate details you have provided us with, including your resume, qualifications, experience, training or abilities.

**Government and law enforcement agencies**

We may share your personal information with regulatory bodies, government agencies and law enforcement bodies to comply with our legislative or regulatory obligations (such as to assist with police investigations or in response to complaints from regulators).

## 6. Disclosure of information in ART arrangements

Assisted Reproductive Treatment (**ART**) often involves more than one person. Where you are undergoing treatment with a partner, relevant information about your treatment may be shared with your partner, including treatment outcome information, unless you specifically instruct us otherwise or we are otherwise required or permitted by law to handle the information differently.

If your preferences change at any time, you should notify Monash IVF Group using the contact details at the end of this Privacy Policy so that your preferences can be recorded and, where practicable, applied.

Where treatment involves multiple parties, such as donor–recipient or surrogacy arrangements, it may be necessary to share certain information with other people involved in the arrangement. This will generally be limited to information required to coordinate and manage the arrangement, provide treatment and comply with applicable legal and regulatory requirements. For example, this may include information about changes that affect treatment timing or a decision by a party not to proceed.

In some cases, Monash IVF Group may only be able to notify affected parties that a relevant change has occurred and may not be able to provide further details about the underlying circumstances, particularly when doing so would disclose another person's personal or health information.

It is important that everyone involved in these arrangements has clear expectations about what information may, and may not, be shared. If you have any concerns or preferences about the disclosure of your information in these circumstances, you should discuss them with your specialist, counsellor or another appropriate member of your care team.



## 7. Counselling services and confidentiality

Information disclosed during counselling sessions with our practitioners, including psychologists, provisional psychologists, social workers, and counsellors, will be treated as confidential and managed in accordance with the relevant professional standards and codes of conduct.

There are limited circumstances in which information disclosed during counselling may be used or disclosed. These include where:

- disclosure is required or authorised by law, including in response to a subpoena, court order or other legal requirement;
- where there is a reasonable belief that failure to disclose the information would pose a serious and imminent risk to your life, health, or safety, or that of another person;
- you have provided informed consent for disclosure, including for the purposes of:
  - consulting with, or referring to, another professional or agency;
  - obtaining or providing a written report external to Monash IVF Group;
  - sharing relevant information with a nominated third party;
- disclosure is otherwise permitted or mandated under relevant legislation or professional obligations.

Information that is relevant to your care may also be discussed within the multi-disciplinary care team. This may include professionals directly involved in your care, such as your specialist, nurses or counsellors, and other members of the clinical team where involvement is reasonably necessary to support your treatment.

Your counsellor may also participate in peer supervision or professional consultation with other appropriately qualified professionals as part of their professional practice, continuing development and quality assurance. Where supervision or consultation occurs within Monash IVF Group, information relevant to your care may be discussed for the purposes of case management, training, clinical review or supporting the quality and safety of the services provided to you.

When supervision or professional consultation is sought externally, information will be shared on a de-identified basis where practicable. However, some sensitive or personal details may need to be discussed where it is relevant to the consultation.

## 8. Cookies, pixels and other third-party online tracking technologies

Monash IVF Group may collect statistical information when you access and use our website and any online platforms available via our website or social media platforms, by utilising features and technologies of your internet browser or social media applications, including cookies and tracking pixels.

Our website contains cookies and tracking pixels from third party providers, including Meta Pixel, Google Ads and Google Analytics 4.

A 'cookie' is a small file stored on your device's browser, which helps us better understand our users and assists us to deliver content via our website.

# Privacy of your information policy

A tracking pixel is a piece of code that a business or third-party provider can place on its website, in email or social media to collect information about a user's activity, including the site pages they visit, time spent on each page, IP address, and/or form inputs (as relevant).

We use tracking technologies for a variety of purposes, including to:

- collect data about our website traffic and social media usage;
- target our advertising;
- analyse how our website and social media is being used;
- improve our website and social media; and
- provide a more user- friendly website and online services.

Information collected through cookies, tracking pixels and similar technologies may be personal information where it identifies you or where you are reasonably identifiable, including through your device, browser, account identifiers, online activity, or information that can be linked with other information held by us or third-party providers. We will only use the personal information, sensitive information and health information collected through these technologies in a way which is compliant with applicable privacy laws.

## How we obtain your consent

When you first visit our website, you will be shown a cookie preferences banner. Cookies and tracking pixels that are not strictly necessary for the website to function will not be activated unless and until you provide your consent.

You can choose to:

- **Accept all** cookies and tracking pixels, including analytical and marketing cookies;
- **Reject non-essential** cookies and tracking pixels, so that only those strictly necessary for the website to function are used; or
- **Customise your preferences**, so that you can choose which categories of cookies and tracking pixels are activated. The categories available are:
  - *Necessary cookies* — required for the website to function and cannot be switched off;
  - *Analytical cookies* — help us understand how visitors use our website, provided by Google Analytics; and
  - *Marketing cookies* — allow us to show you advertising about our services on other websites and platforms, based on how you have used our website, provided by Meta and Google, who may hold this information overseas.

You can review or change your cookie preferences at any time by selecting the cookie preferences icon, available on every page of our website.

In addition to managing your preferences through our website, you can also manage cookies and tracking pixels through your web browser settings, or through the privacy controls offered directly by our third-party providers. Please note that these third-party controls operate independently of our website's preferences, and disabling cookies through your browser may affect the functionality of our website.

## Other ways to manage tracking

Most web browsers allow you to manage cookies through their settings. You can choose to block or delete cookies, or receive a notification before a cookie is stored on your device.

Your cookie preferences set on our website control whether these tools collect data from your visits here. The links below let you manage how each provider uses data more broadly, across their own platforms, independent of your choices on this site.

- Chrome: <https://support.google.com/chrome/answer/95647>
- Safari: <https://support.apple.com/en-au/guide/safari/sfri11471/mac>
- Firefox: <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop>
- Edge: <https://support.microsoft.com/en-au/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>

## 9. Regulatory uses of data

As a healthcare provider, Monash IVF Group is subject to oversight by regulatory, accreditation and quality assurance bodies. Your information may be accessed or reviewed as part of external audits, accreditation assessments, as required under ASX listing rules or compliance activities conducted by organisations such as state and territory regulators, the Reproductive Technology Accreditation Committee, the Australian Commission on Safety and Quality in Health Care, and the National Association of Testing Authorities. These organisations are subject to legal and professional obligations regarding the handling of personal information. Audit and accreditation reports generally do not contain identifying information.

Monash IVF Group may also be required to provide information to regulatory bodies, registries or other organisations in connection with ART services.

This may include:

- providing identifying information relating to donor conception treatment outcomes to relevant state or territory regulators, donor registers or birth registries, where required or authorised by law;
- providing ART treatment and outcome data to state and territory regulators and the National Perinatal Epidemiology and Statistics Unit. Where possible, this information will be de-identified before being shared and may be used for reporting, monitoring, statistical and research purposes; and
- disclosing your information where required or authorised by law, including in response to a court order, tribunal order, warrant or other lawful request.

## 10. Use of information for research and data analysis

Monash IVF Group undertakes research to improve clinical outcomes, safety and innovation in reproductive medicine. This may involve using information for data analysis, research, quality improvement and related purposes.

Monash IVF Group may identify research opportunities that require access to health information, including through collaborations with third parties. Where personal or health information is used or disclosed for research purposes, Monash IVF Group will do so in accordance with applicable privacy laws. This may include obtaining approval from a Human Research Ethics Committee where required.

External research bodies or clinical registries, such as the National Perinatal Epidemiology and Statistics Unit, may also hold or use de-identified data for research, statistical reporting and registry purposes, where permitted.

You can opt out of the use of your information for data analysis and research by contacting [mivfgresearch@monashivfgroup.com](mailto:mivfgresearch@monashivfgroup.com).

## 11. Overseas disclosures

In some circumstances, it may be necessary or appropriate for us to disclose your personal information to overseas recipients in connection with the provision of your health care and related services. This may occur, for example, where testing is undertaken overseas because the relevant service is not available in Australia, or where a service provider we engage is located overseas.

Currently, this may include disclosure:

- to overseas donor gamete banks, for purposes such as monitoring family limits and obtaining or updating medical information relevant to children born from donor gametes;
- to overseas providers where you have requested the transfer or transportation of your cryo-preserved biological material; and
- to overseas technology service and cloud storage providers that support Monash IVF Group's systems and operations.



In such circumstances, we will inform you of the country in which the recipient is located and the purpose for which your information is being disclosed and held overseas in accordance with applicable legislative requirements.

We may also disclose your information to our third-party IT and administration suppliers, including suppliers based in India and the Philippines.

Where your personal information is disclosed overseas, we will take reasonable steps to ensure that the disclosure is handled in accordance with applicable privacy laws.

If you would like a list of current offshore recipients of your personal information, please contact us using the details below.

## 12. Can you deal with us without providing your personal information?

You are under no obligation to provide your personal information to Monash IVF Group. We will provide individuals with the option of not identifying themselves, if it is lawful and practicable to do so. For example, you can access our website, make general phone queries or email us without having to identify yourself.

However, without certain information from you, the Monash IVF Group may not be able to provide you with our full scope of services or information that is tailored to your needs, and we may generally be limited in how we can interact with you. Where you do not provide us information relevant to your health care, we may not be able to provide you with health services, or the services we provide to you may not be appropriate to your requirements. You may also suffer some harm or an adverse outcome if you do not provide such information.

Additionally, providing false or misleading information, or failing to provide relevant information when required, may constitute an offence under applicable assisted reproductive treatment legislation.

## 13. Do we share your personal information for direct marketing purposes?

Direct marketing involves the use and/or disclosure of personal information to communicate directly with an individual to promote goods and services.

Monash IVF Group may use and share your personal information for direct marketing through various channels, such as via post, email, SMS, telephone or social media (through targeted advertisements on certain websites, mobile applications and social media channels).

We will only send these communications in accordance with the Privacy Act (including Australian Privacy Principle 7) and the *Spam Act 2003* (Cth), and only where you have not opted out from receiving such communication from Monash IVF Group.

# Privacy of your information policy

Where we use your personal information, including sensitive information, to show you targeted advertising on other websites or platforms based on your use of our website (for example, through Meta Pixel or Google Ads), we will only do so where you have provided your consent through the Marketing cookies setting on our website, as described above. You can withdraw this consent at any time by updating your cookie preferences on our website.

At the point of information collection, Monash IVF Group provides you with a mechanism to opt-out of direct marketing to ensure that consent is not obtained through pressure or lack of choice.

Generally, you can opt-out at any time by following the relevant opt-out or unsubscribe instructions in the relevant communication (such as email or SMS message) or through managing your browser preferences.

You can also contact us using the details set out at the end of this Privacy Policy to tell us you would like to stop receiving direct marketing communications from us.

If you have indicated a preference for a method of communication, we will endeavour to use that method wherever practical to do so.

Regardless of whether you opt out from receiving any or all direct marketing communications, we will still communicate with you if required by law to provide you with information, or in relation to the products or services we are providing to you, or if we are otherwise required or permitted by law to do so

## 14. Quality, security and storage of personal information

We are committed to protecting your personal information and ensuring that we securely store any personal information we collect (in accordance with applicable privacy laws).

Paper records are stored in secure facilities, and electronic records are maintained in secure systems with appropriate access controls and security safeguards. Our core systems are hosted in Australian data centres, with backup and cloud storage services subject to appropriate security protections.

Monash IVF Group takes steps reasonable in the circumstances to ensure that the personal information it holds is accurate, complete, up-to-date and stored in a secure environment protected from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Medical records are retained for a minimum of seven years. Longer retention periods apply where required by law, including for records involving donor gametes, embryos or where a child has been born.

## 15. Privacy complaints

If you have any questions or concerns about this Privacy Policy or how we have handled your personal information, you may contact our Privacy Officer using the contact details below, who will respond to you within a reasonable time (usually within 30 days).

Please contact us if you have a complaint about privacy. If you make a complaint about privacy, the following will occur:

# Privacy of your information policy



- Step 1** We will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally acknowledge your complaint within 3 working days.
- Step 2** If your complaint requires more detailed consideration or investigation:
- we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly; and
  - we may ask you to provide further information about your complaint and the outcome you are seeking. If your initial complaint was not written, we may ask you to submit your complaint in writing.
- Step 3** We will then typically gather relevant facts, locate and review relevant documents and speak with the individuals involved.
- Step 4** In most cases, we will respond to your complaint within 30 days from when we receive your complaint. If the matter is more complex or our investigation may take longer, we will let you know and will tell you when we expect to provide our response.

If you are not satisfied with our response to a complaint, or you consider that we may have breached the Privacy Act (including the Australian Privacy Principles), you are entitled to make a complaint to the Office of the Australian Information Commissioner (the Australian privacy regulator).

The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992, or you can fill out [this form](#) to make a complaint about our handling of your personal information.

Full contact details for the Office of the Australian Information Commissioner can be found online at [www.oaic.gov.au](http://www.oaic.gov.au).

There are other relevant complaint handling bodies where State-based legislation applies, including the Victorian Health Complaints Commissioner, the Office of the Victorian Information Commissioner and the NSW Information and Privacy Commission.

## 16. How you can access or seek correction of your personal information?

You are entitled to request access to any of your personal information held by Monash IVF Group. To make such an access request, please contact us using the contact details below.

Monash IVF Group takes reasonable steps to ensure the personal information it holds is accurate, up-to-date, complete, relevant and not misleading. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and informing us of any change in your personal details.

In addition, under the Privacy Act, you have a right to seek access to and correction of your personal information that is collected and held by Monash IVF Group. If at any time you consider any personal

# Privacy of your information policy

information we have about you is inaccurate, out of date, incomplete, irrelevant or misleading, you are entitled to request correction of that information using the contact details below.

If we correct personal information about you, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, we will take reasonable steps to do so, unless this would be impracticable or unlawful.

Monash IVF Group will respond to your request within a reasonable time (usually within 30 days) and we may charge a fee for access where appropriate and permitted by law. We may decline your request to access or correct your personal information in certain circumstances in accordance with applicable privacy laws, however if we do so, we will provide you with written reasons for the refusal and details of complaint mechanisms.

If you are dissatisfied with Monash IVF Group's refusal to grant access to, or correct, your personal information, you may complain to our Privacy Officer using the contact details below.

## 17. Updates to this Privacy Policy

Monash IVF Group will regularly review its policies and procedures regarding personal information and may therefore update and amend this Privacy Policy from time to time, with or without notice to you.

However, where we make a material change to this Privacy Policy, we will provide notice to you (including by updating our websites, and where appropriate, notifying you directly).

We recommend that you visit this Privacy Policy regularly to keep up to date with any changes we make.

## 18. Contact Monash IVF Group

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications or make a privacy complaint, please contact us at [privacy.officer@monashivfgroup.com](mailto:privacy.officer@monashivfgroup.com)