

Orthocell Ltd, Orthocell (USA) LLC and their related companies and affiliates (“Orthocell,” “we,” “us” or “our”) will handle personal information lawfully, fairly, transparently and securely.

This Privacy Policy applies to personal information we collect when you interact with us, including through our websites, forms, communications, events, clinical services, research activities, investor communications, employment processes and other business activities.

Our website may serve users in the United States, Australia, the United Kingdom, Canada, the European Economic Area and other markets. We will comply with each country’s respective privacy and data protection laws that apply to our activities.

1. Personal information we collect

Personal information is information that identifies, or can reasonably identify, an individual. In some places, it is called personal data.

The personal information we collect from you may vary depending on the nature of your interaction with us. We will collect only the personal information we reasonably need for our business, clinical, regulatory and legal activities. This may include:

- contact and identity details, such as name, address, phone number, email address and organisation;
- professional and business details, such as job title, specialty, workplace, professional interests, registration details and business relationship;
- interaction records, such as inquiries, correspondence, forms, subscriptions, event attendance, downloads, meeting notes and customer relationship records;
- website, device and preference information, such as pages visited, forms submitted, approximate location, communication preferences and privacy choices;
- health information or other sensitive information, where permitted by law or where you have provided consent, and necessary for clinical services, patient management, product safety, research, regulatory, quality, complaint handling, reimbursement or legal purposes; and
- investor, media, stakeholder, recruitment, employment and contractor records.

We will collect personal information directly from you where reasonably practical. We may also collect it from healthcare providers, hospitals, clinics, distributors, commercial partners, event organisers, service providers, public sources, recruitment sources, regulators or other permitted sources.

2. How we use personal information

We will use personal information only for purposes related to our business, clinical, regulatory and legal activities, or as otherwise permitted by law and consistent with your relationship with us. These purposes may include: The personal information that we collect is generally used to provide products or services to you, and, if you use our website, to track your usage, to evaluate performance of our website, and to keep track of your account settings. Information collected by us may also be used for the following purposes:

- providing clinical services and maintaining required medical and administrative records;

- responding to inquiries and supporting patient care, patient safety, quality processes and product safety reporting;
- conducting research, product development, clinical evaluation, post-market surveillance and regulatory activities;
- communicating with healthcare professionals, distributors, commercial partners, investors, media, employees, contractors and other stakeholders;
- providing medical education, product information, training, events and professional resources;
- to improve the quality of our products or services;
- operating, maintaining, improving, evaluating performance, and securing our websites (including tracking your usage of our websites), forms, databases, records and business systems;
- managing consent preferences, privacy requests, subscriptions, marketing preferences and opt-out requests;
- sending marketing, educational, event, product, investor or company communications where permitted by law;
- conducting advertising and communications only in appropriate and approved markets, consistent with applicable laws and regulatory requirements;
- managing recruitment, employment, contractor, governance, audit, tax, finance, legal and business administration processes; and
- protecting the rights, safety, security and integrity of Orthocell, our personnel, patients, users, systems and information.

We will not use personal information for unrelated purposes unless permitted by law or you have provided consent.

3. Cookies, online choices and marketing

In using our websites, your personal information may be collected through the use of cookies. We will use cookies and similar online tools only as permitted by law and in accordance with your privacy choices. Where required, we will provide controls for non-essential cookies, analytics, targeted advertising and related privacy preferences.

We will send marketing, investor or educational communications only where permitted by law or with consent where required. You can opt out at any time by using the unsubscribe link in our emails, updating your preferences where available or contacting us.

We will not use or disclose patient health information for targeted advertising. We will not disclose patient health information to advertising platforms.

Sometimes our websites contain links to other websites. When you access a website other than our websites, we are not responsible for the privacy practices of that site. We recommend that you review the privacy policies of each website you visit.

4. Disclosure of personal information

We will disclose personal information only where the disclosure is reasonably necessary for the purpose for which we collected the personal information, or where permitted or required by law. This may include disclosure to:

- Orthocell related companies and affiliates, including those based overseas;
- healthcare providers, hospitals, clinics, laboratories and clinical partners, where relevant to patient care, clinical services, research, quality or patient safety;
- distributors, commercial partners, service providers and professional advisers;
- website, hosting, information technology, data storage, security, email, analytics, advertising and other technology and business support providers;
- event organisers, logistics providers, medical education partners, recruitment providers and referees; and
- regulators, government authorities, stock exchanges, courts, law enforcement bodies, auditors, insurers and legal advisers.

We will require third parties that handle personal information for us to apply appropriate privacy, confidentiality and security protections.

We do not sell personal information in the ordinary meaning of that phrase. Where applicable privacy laws treat certain advertising or analytics activities as a “sale,” “sharing” or targeted advertising, we will provide the relevant opt-out choices.

5. International transfers

We operate across multiple countries. Personal information may be processed in, transferred to or accessed from the United States, Australia, the United Kingdom, Canada, the European Economic Area and other countries where Orthocell, its affiliates or service providers operate. We will use lawful transfer mechanisms and reasonable safeguards where required by applicable privacy and data protection laws.

6. Security and data breaches

We are committed to protecting your personal information. We will take reasonable technical, organisational and administrative steps to protect personal information from misuse, loss, unauthorised access, modification or disclosure. This includes the use of technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect the privacy of your personal information. We will restrict access to people and service providers who need it for legitimate business, clinical, regulatory, technical or legal purposes.

If a data breach requires notification under applicable law, we will take the steps required by that law.

7. Health information, sensitive information and children

We will collect, use and disclose health information and other sensitive information only where permitted by law, where necessary for patient care, patient safety, clinical services, research,

regulatory, quality, reimbursement, complaint handling or legal purposes, or where you have provided consent.

Our websites and marketing activities are not directed to children. Where personal information about a child is required for clinical, safety, legal or regulatory purposes, we will handle it in accordance with applicable law and with appropriate consent or authorisation where required.

8. Your rights and choices

Depending on your location and the laws that apply, you may have rights to request access, correction, deletion, restriction, objection, portability, withdrawal of consent, marketing opt-out, opt-out of sale, sharing or targeted advertising, limitation of sensitive personal information, or to make a privacy complaint.

We will respond to privacy requests within the timeframe required by applicable law. We may need to verify your identity before responding. Some rights are subject to exceptions, including where information must be retained for legal, regulatory, clinical, safety, research, accounting or legitimate business purposes.

For access and correction requests, your information will be provided free of charge, however, we may charge a reasonable fee if your request requires a substantial effort on our part.

Where we must identify a lawful basis for processing personal information, we will rely on consent, contractual necessity, legal obligations, legitimate interests, vital interests, public interest, scientific research purposes or another lawful basis that applies.

9. Complaints

If you have a concern or complaint about this Privacy Policy or the way we handle personal information, please contact us using the details below. We will seek to resolve your complaint as soon as reasonably practical.

You may also have the right to contact a privacy regulator in your country or region.

If you are in the USA and are dissatisfied with our response, you may file a consumer privacy complaint with the Federal Trade Commission (FTC) by visiting reportfraud.ftc.gov or by phoning 1-877-FTC-HELP (1-877-382-4357).

If you are in Australia, if you are dissatisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at enquiries@oaic.gov.au.

10. Contact us

For privacy inquiries, access or correction requests, complaints, consent questions or marketing opt-outs, please contact:

Orthocell Privacy Officer

Email: info@orthocell.com

Phone: +61 8 9360 2888

United States

Orthocell (USA) LLC
1445 Woodmont Ln NW #3794
Atlanta, GA 30318

Australia

Orthocell Ltd
Building 191, Murdoch University
90 South Street
Murdoch, WA 6150
Australia

11. Policy updates

We may update this Privacy Policy from time to time. The latest version will be made available on our website. Where required by law, we will notify you of material changes or seek renewed consent.

This is a representation of an electronic record that was signed electronically and this redacted page is the manifestation of the electronic signatures.