# PRIVACY POLICY

**Dr David Morawetz** ABN 99 400 766 842 trading as Sleep Better Without Drugs (together referred to as "we" and "Sleep Better"). We produce and distribute the Sleep Better Without Drugs self-help kit.

Sleep Better is bound by the National Privacy Principles outlined in the *Privacy Act* 1988 (Cth) (referred to as the "**Privacy Act**") and is therefore subject to obligations relating to the collection, use, disclosure, accuracy, security, accessibility and export of personal information.

Sleep Better is committed to educating its employees on information privacy obligations and compliance. This Privacy Policy sets the policies of Sleep Better with respect to its handling of personal information.

## **Privacy Guarantee**

Your personal details will not be passed on to any other individual or organisation. You will never receive spam as a result of contacting or ordering from us.

#### **Collection of information**

Sleep Better may collect personal information in various circumstances including the following:

- information is collected in the course of receiving orders, questions, comments and complaints from customers either via our website or through our customer service centre; and
- information collected from customer surveys or customer panels.

The personal information collected and retained usually depends upon the circumstances but may include:

- Name
- mailing or street address
- · contact details including phone numbers, fax numbers and email addresses
- details of the products you have purchased from us or which you have enquired about, together with an additional information necessary to deliver those products and to respond to your queries.
- Payment transaction details
- In the case of our website, how you use the website and information regarding your browsing history when you visit the website
- Any additional information you provide to us directly or indirectly through our website; and
- Information you provide to us through our customer service centre or customer surveys or panels.

In most cases, information will be collected directly from the individual concerned. Where it is collected through a third party, we shall endeavour to ensure that the individual is made aware of this.

#### Disclosure of information by Sleep Better

We will treat personal information we collect with the strictest confidence and will only disclose that information in accordance with the requirements of the Privacy Act. Personal information may be disclosed in various circumstances including, but not limited to any of the following:

- to a contractor under an outsourcing arrangement for any purpose for which Sleep Better may use the personal information as listed below but only where the contractor is committed to meeting the same privacy obligations as those binding on us;
- to our professional advisers, including our accountants and lawyers;
- in accordance with consent from the individual concerned; or
- where disclosure is necessary to respond to requests from law enforcement agencies or is required or authorised by applicable laws, court orders or government regulation.

## Use of information by Sleep Better

We may use personal information for a wide range of purposes depending upon the circumstances in which we receive or collect the information. These purposes may include any of the following:

- responding to customer orders, enquiries and complaints;
- direct marketing:
- market research; and
- maintaining contact with customers.

Without an individual's personal information, we will not be able to fulfill these purposes.

## What we will not do with the information we gather.

Unless required by law or the Privacy Act permits us to, we will not:

- sell personal information to third parties
- give third parties access to personal information.

#### Security

We are committed to keeping personal information secure and will take reasonable steps to protect it from misuse or unauthorised alteration. We may hold your information in either electronic or hard copy form.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

# Access to personal information and privacy complaints

Dr Morawetz is the entity that is collecting personal information and that will hold personal information for the purposes of the Privacy Act. Any person may obtain access to information we hold about him or her in accordance with the requirements and qualifications in the Privacy Act. Generally, if we are requested to do so, we will amend any personal information we hold that is inaccurate, incomplete or out of date. To ensure that personal information we hold is accurate and up-to-date, we request that individuals who have trading or business relationships with us notify us of any changes to their personal details as soon as possible.

Any request for access about the information we hold and any question or complaint about our handling of personal information may be made by either:

contacting us via telephone: (613) 9274 6073; or in writing addressed to:

Privacy Officer Dr Morawetz Sleep Better Suite 5, 596 North Rd Ormond, Victoria 3204 Australia

### **Changes to our Privacy Policy**

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last updated on 12 March 2014.