



# Privacy Policy

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## 1. Introduction

- 1.1. Glutagen Sales Pty Ltd (ACN 636 869 200) (“**Glutagen**”), licensee of the GluteGuard brand, respects and upholds your rights under the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (“**Privacy Act**”) and, to the extent applicable, the rights afforded under the European Union General Data Protection Regulations (“**GDPR**”).
- 1.2. This Privacy Policy for Glutagen lets you know what personal information of yours we hold, what we do with it, to whom we will disclose it, and how you can access the personal information we hold about you.
- 1.3. You can also find out how to change inaccurate personal information and how to opt out of receiving communications from us.

## 2. What personal information about you does Glutagen collect and hold?

- 2.1. Glutagen does not collect personal information about you when you visit the Glutagen website unless you choose to provide us with such information by:
  - (a) submitting an online order to us;
  - (b) make an email enquiry; or
  - (c) otherwise knowingly offer the personal information through your dealing with us.
- 2.2. In relation to an online order, the information we collect will include any personal and sensitive information you provide to us to allow the processing and dispatch of your order. In relation to email enquiries, this information will include your name, email address, address, employment or company details and any other information you provide to us in your enquiry.
- 2.3. If you decide to complete an online order form, the information you enter into the online form will only be collected by us if you submit your online order.

## 3. How does Glutagen collect and hold your personal information?

- 3.1. Where possible, Glutagen will generally collect your personal information directly from you. Glutagen will only store information that is of direct commercial relevance to the company.
- 3.2. We may also collect personal information from our website, in promotional activities such as promotional events and competitions, and, where you have provided your consent, from the organisers of events that we sponsor or with which we are involved.
- 3.3. Where personal information is collected by Glutagen from or in relation to individuals residing in the EU, the collection and management of such information shall be in compliance with all requirements of a data controller under GDPR. Where Glutagen collects personal information from a third party in respect of individuals residing in the EU, the third party shall ensure they are

in compliance with all requirements of a data controller under GDPR, and Glutagen will assist in their compliance to the extent practicable.

## 4. What does Glutagen do with your personal information?

- 4.1. We will only use and disclose your personal information for the purposes which you provide it. In relation to enquiries you submit to us, we will use the information for the purposes of responding to your enquiry. In respect of online orders submitted to us, we will use this information to process and dispatch your order. In respect of personal information provided to us by third parties, we will use this information for the purpose for which it was provided by the individual in compliance with our legal and contractual obligations under the Privacy Act, GDPR and other applicable legislation and regulations.

## 5. Who will Glutagen disclose your personal information to?

- 5.1. Glutagen may disclose your personal information to Glutagen staff involved in processing your order or enquiry. We may also disclose your personal information to advisors, consultants and contractors we ordinarily engage for the above purposes (such as lawyers, accountants and IT service providers).
- 5.2. We may disclose your personal information to third party service providers overseas who are not subject to similar laws to the Privacy Act or the GDPR. However, where your personal information is disclosed to an overseas recipient, we will take adequate measures to ensure that the personal information is handled by the overseas recipient in accordance with the Privacy Act and GDPR, and our instructions for the purposes described above. By providing Glutagen with your personal information, you consent to this disclosure of your personal information.

## 6. Openness

- 6.1. You may request access to personal information we hold about you by contacting the Privacy Officer on the details provided below. Where we hold information that you are entitled to access, we will endeavour to provide you with a suitable range of choices as to how access is provided (e.g. emailing or mailing it to you). A fee may be charged to cover the cost of retrieval, unless otherwise prohibited by law.
- 6.2. If at any time you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request amendment of it and we will either amend the information or make a record of your comment, as we think appropriate. Where the personal information relates to a data subject in the EU, and Glutagen is not the data controller, Glutagen will assist the data controller in amending the relevant personal information. In these circumstances, all data access and modification requests should be addressed to the data controller.



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### 7. Marketing and use for a secondary purpose

- 7.1. Where we have obtained your consent to do so, we may contact you from time to time with marketing material about our other products or services. In circumstances where you would reasonably expect that your personal information would be used or disclosed for a secondary purpose that relates to the primary purpose for which the personal information was provided, we may deem that you have consented to receiving information and having your personal information disclosed for this secondary purpose.
- 7.2. At any time, you may opt out of receiving marketing or other materials by contacting us at [info@glutagen.com](mailto:info@glutagen.com). Your consent to receiving information from us will remain current until withdrawn by you, which you are entitled to do at any time.

### 8. Questions and complaints

- 8.1. If you have any questions about this Privacy Policy, or believe that we have at any time failed to keep one of our commitments to you to handle your personal information in the manner required by the Privacy Act and the GDPR, then we ask that you contact our Privacy Officer immediately on +61 03 8646 3878 or [info@glutagen.com](mailto:info@glutagen.com). If your query is not urgent, you can also contact us by post at:

Privacy Officer  
Glutagen Sales Pty Ltd  
Level 1, 159 Dorcas Street  
South Melbourne VIC 3205

- 8.2. We will respond and advise whether we agree with your complaint or not. If we do not agree, we will provide reasons. If we do agree, we will advise what (if any) action we consider it appropriate to take in response. If you are still not satisfied after having contacted us and given us a reasonable time to respond, then we suggest that you contact the Office of the Australian Information Commissioner (AIOC):
- (a) by phone on 1300 363 992 (local call cost, but calls from mobile and pay phones may incur higher charges);
  - (b) if calling from overseas (including Norfolk Island) by phone on +61 2 9284 9749;
  - (c) by TTY on 1800 620 241 (this number is dedicated to the hearing impaired only, no voice calls);
  - (d) if you require a translating and interpreting service, by phone on 131 450 (If you don't speak English or English is your second language and you need assistance and ask for the Office of the Australian Information Commissioner);
  - (e) by post at GPO Box 2999, Canberra ACT 2601;
  - (f) by fax on +61 2 9284 9666; or
  - (g) by email on [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

- 8.3. In accordance with the GDPR, Glutagen supports third parties that function as data controllers to comply with their obligations to data subjects residing in the EU. If you are a resident in the EU and have a query in relation to personal information provided to a data controller that has engaged Glutagen to hold or process that personal information, please contact the privacy officer or equivalent position at that data controller for assistance.

### 9. Glutagen Website

- 9.1. When visiting Glutagen's website, the site server makes a record of the visit and logs the following information for statistical and administrative purposes:
- (a) the user's server address – to consider the users who use the site regularly and tailor the site to their interests and requirements;
  - (b) the date and time of the visit to the site – this is important for identifying the website's busy times and ensuring maintenance on the site is conducted outside these periods;
  - (c) pages accessed and information downloaded – this indicates to Glutagen which pages or documents are most important to users and also helps identify important information that may be difficult to find;
  - (d) duration of the visit – this indicates to us how interesting and informative the Glutagen site is to candidates or how quickly and effectively users are able to navigate our website; and
  - (e) the type of browser used – this is important for browser specific coding.
- 9.2. In order to optimise the Glutagen web site and better understand it's usage, we collect the visiting domain name or IP address, Computer Operating System, Browser Type and Screen Resolution.

### 10. Retention and destruction of personal information

- 10.1. Glutagen will retain your personal information after your relationship with us expires. However, should you wish for the information to be destroyed, you can do so by contacting our Privacy Officer. In this case your personal information will continue to be protected in accordance with this Privacy Statement. If we destroy personal information we will do so by taking reasonable steps and using up-to-date techniques and processes.
- 10.2. Following the procedure for questions and complaints, if you are a resident in the EU who provided your personal information to a third party that subsequently provided such information to Glutagen, and would like your personal information destroyed, please contact the privacy officer or equivalent position at the relevant data controller.

### 11. Security of information

- 11.1. Glutagen will take reasonable steps to protect your personally identifiable information as you transmit your information from your computer to our website and to



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protect such information from loss, misuse, and unauthorised access, use, modification, disclosure, alteration, or destruction.

11.2. However, you should keep in mind that the transmission of information over the internet is not completely secure or error-free. In particular, email sent to or from this website may not be secure, and you should therefore take special care in deciding what information you send to us via email.

### 12. Miscellaneous

12.1. In this policy “personal information” has the same meaning as under the Privacy Act, and equivalent definition under the GDPR as applicable.

12.2. This policy is effective from 25 May 2018. We may change this policy from time to time. Although we intend to observe this Privacy Policy at all times, it is not legally binding on Glutagen in any way. From time to time we may regard it as necessary or desirable to act outside the policy. Glutagen may do so, subject only to any other applicable contractual rights you have and any statutory rights you have under the Privacy Act or other applicable legislation (or the GDPR or other applicable regulation).

12.3. The information on the Glutagen website is intended as a general reference. Glutagen will make every reasonable effort to maintain current and accurate information. The information and data on the Glutagen web site is subject to change without notice. Users should carefully evaluate the accuracy, currency, completeness and relevance of this information for their purposes before relying on the material in any important matter.

### 13. Disclaimer

13.1. To the maximum extent permissible by law, Glutagen:

- (a) accepts no liability for any use of or reliance placed on the said information and data;
- (b) makes no representations, either expressed or implied, as to the suitability of the said information and data for any particular purpose;
- (c) makes no warranties that the said information and data are free of infection by computer viruses or other contamination; and
- (d) accepts no responsibility for the information provided to individuals resident in the EU by data controllers for which Glutagen is the data processor of the relevant information.

13.2. Links to other sites are provided for readers' convenience. Glutagen does not accept responsibility for information on any website beyond our own. In some cases the material may incorporate or summarise views, standards or recommendations of third parties. Such material is assembled in good faith, but does not necessarily reflect the considered views of Glutagen, or indicate a commitment to a particular course of action.

13.3. To link your website to any part of the Glutagen web site or to feature links to the Glutagen website on your website, you can request permission by emailing us at [info@glutagen.com](mailto:info@glutagen.com).