Privacy Policy - Zoetis Australia Pty Limited

1 Respecting your privacy

1.1 We understand that the privacy and confidentiality of your personal information is important to you. That is why we are committed to safeguarding the personal information you provide to us. Our intention is to use the personal information about you to make your dealings with us better suited to your needs.

2 Unsubscribing from electronic communications from us

2.1 If you decide that you no longer want to receive electronic direct marketing from us, you may unsubscribe by clicking on the unsubscribe link contained on the communication.

3 What information does Zoetis collect and hold?

3.1 We may collect personal information about you through our interactions with you and from third parties (such as our affiliates, publicly available information from our own records and when permitted by law). What we collect depends on the nature of our interaction. For example, we may collect personal information about you when you send us an email, provide content, make an enquiry or order products from us, or when you are prompted and you provide personal information. We may keep a record of, for example, your name, contact details (i.e. address, telephone number, etc), your personal interests and opinions and, when collecting personal information for business purposes, your professional details (e.g. qualifications, speciality, areas of interest) as well as details on your practice/business (e.g. size, use of products) and details of your dealings with us.

4 What happens if I do not provide personal information?

4.1 If you do not provide your personal information, you may not be able to purchase the Zoetis products you require or fully use Zoetis services.

5 Information about other people

5.1 If you provide personal information about other people to us, you must tell that person that you are providing their personal information to us, obtain their consent to our collection, use and disclosure of that information, inform them where they can find our privacy policy, and inform them that we can be contacted for further information.

5.2 If the sale of a product requires you to collect, use or disclose, on our behalf, any personal information, you must do so in accordance with all applicable privacy laws and generally accepted good practice.

6 How does Zoetis use personal information and to whom does Zoetis disclose it?

6.1 We will use personal information collected about you for the purposes for which it is collected, to provide and promote our goods and services to you and for the following purposes and/or any related secondary purposes:

(a) for maintaining a record of queries, complaints and adverse event or adverse reaction reports relating to our products and reporting these to relevant regulatory bodies, such as the Australian Pesticides and Veterinary Medicines Authority, or vets/doctors/researchers/investigators (and people who assist them), as appropriate or required;

(b) to provide animal health products or services (including advice) that have been requested by you;
(c) for sending you material on our activities and products or developments in animal health treatments that Zoetis believes may be of interest to you and tailoring marketing services and advertising to suit your needs and interests;

(d) for administering conferences, symposia, expert panels, seminars or other similar programs organised by us, which you agree to participate in or be involved with;

(e) for administering disease awareness/management programs or other similar programs organised by us, which you agree to participate in or be involved with;

(f) to involve vets/researchers/investigators (and people who assist them) in clinical trials;

(g) to comply with legal obligations such as notifying you of matters that we may be required by law to notify you of (e.g. product recalls);

(h) for managing, planning and arranging meetings between you and our sales representatives;

(i) for monitoring and reviewing our compliance with relevant regulations and codes of conduct in our dealings with you and monitoring the quality, safety and efficacy of our products;

(j) to conduct credit checks on you and your business, and to open a credit account for you or your business, following receipt of an application from you;

(k) to conduct security checks on you and your staff in connection with drug regulatory agency requirements; and

(l) for generating customer lists for the purposes of market research.

6.2 We may transfer or disclose your personal information to the following parties ("Third Parties") for the following purposes and/or any related secondary purposes:

(a) our affiliates within or outside of Australia;

(b) parties within or outside of Australia to help Zoetis improve its products and services;

(c) regulatory authorities, within or outside of Australia, and ethics committees as part of a clinical trial evaluation, monitoring or inspection process;

(d) third party service providers to permit them to provide services such as provision of infrastructure, IT services, data analysis, email delivery services, customer services and other similar services; and/or

(e) other parties as permitted or required by law or as we believe to be appropriate: (a) to enforce these terms; (b) to protect our operation or those of any of our affiliates; (c) to protect our rights, privacy, safety, confidentiality, reputation or property and/or that of our affiliates, you or others; (d) to prevent fraud or cyber crime; (e) to obtain legal advice; (f) to permit us to pursue available remedies or limit the damages that we may sustain; (g) to identify any user who provides content on a Zoetis service or otherwise uses a Zoetis service that is unlawful or is otherwise in violation of the law or these terms; and (h) in connection with a merger or sale involving all or part of Zoetis or as part of a corporate reorganisation or share sale or other change in corporate control.

6.3 We will take reasonable steps to ensure organisations outside Zoetis, who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect an individual’s right to privacy and comply with applicable data protection laws and these terms.
6.4 In using and storing your personal information and/or in disclosing your personal information to the Third Parties or otherwise providing any of the Third Parties with access to your personal information, we may be required to transfer your personal information to jurisdictions other than the jurisdiction in which you reside. This may include, but is not limited to, the United States, Europe, Asia, South America, and/or India.

7 Human exposure to animal health products

7.1 We collect information about cases of human exposure to some of our products for several reasons, set out in paragraph 7.2 below. If you contact us, or someone contacts us on your behalf, to inform us that you have been, or may have been, exposed to one of our products, we will collect information (including personal information) about you, about the person reporting the incident to us and about your medical practitioner. Some of the information we collect about you will be sensitive information under applicable privacy laws, because it will relate to your health.

7.2 The sensitive health information we collect in relation to an actual or potential human exposure to some of our products is collected only for regulatory and safety purposes, and we will only disclose it to medical practitioners, health professionals and regulatory bodies. The personal and sensitive information we collect will also be transferred overseas, to the US and possibly other countries, when it is entered into our pharmacovigilance system.

7.3 Where possible, we will confirm with you or the person reporting the incident on your behalf that you consent to the collection and disclosure of your personal and sensitive information as set out in this section.

8 Security of personal information

8.1 We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access.

8.2 While we endeavour to keep personal information secure and confidential, we will not be responsible for any breach of security caused by third parties and do not represent that any Zoetis services, such as our websites, are completely secure.

9 What do we do with personal information when it is no longer needed?

9.1 We will take reasonable steps to destroy or de-identify personal information that is no longer needed for any purpose for which it may be used or disclosed under applicable privacy laws. If we are no longer permitted or required by law to retain it, we will use secure methods to destroy or de-identify the information.

10 Is the personal information up-to-date?

10.1 We endeavour to make sure that the personal information we hold is accurate, complete and up to date. If we are notified that the information that we hold is not accurate, complete or up to date, we will take steps to validate the information and ensure that it is corrected.

11 Access to personal information

11.1 In most circumstances we allow individuals to access the personal information we hold about them. However, access may be denied where we are permitted or required by law to deny access to such information.

11.2 If we refuse to provide you with access to your personal information, we will provide you with reasons for the refusal.

12 Cookies
12.1 Like many website operators, we may use standard technology called cookies on our websites. Cookies are small data files that are downloaded onto your computer when you visit a particular website. Cookies help provide additional functionality to the site and can allow target advertising more effectively on our and third party services, or help us to analyse site usage more accurately. For instance, our server may set a cookie that keeps you from having to enter a password more than once during a visit to one of our sites. In all cases in which cookies are used, the cookie will not collect personal information except with your explicit permission. You can disable cookies by turning them off in your browser. However, some Zoetis services may not function properly if you do so.

13 **IP Addresses**

13.1 An IP (internet protocol) address is a number that is automatically assigned to your computer by your internet service provider when you log on. We may collect and use IP addresses to identify individuals who may threaten or risk harming Zoetis web pages, services or customers, as well as for the purpose of conducting website analytics or serving and targeting online advertisements.

14 **Clickstream**

14.1 A 'clickstream' or 'clickstream data' reflect the specific web pages visited by an individual user and importantly, the manner or traffic pattern by which a user moves from one web page to another. We track this information on certain Zoetis services to understand user habits and personalise their interaction with Zoetis, and to serve and target advertisements more effectively.

15 **What if you have an enquiry or complaint about privacy?**

15.1 If you have any enquiries or complaints relating to our privacy practices or procedures, including requests for access to personal information, or if you believe that the personal information that Zoetis holds about you is incorrect, incomplete or inaccurate, you may contact the Zoetis Privacy Officer in writing at:

   **E-mail:** animalhealth.privacyANZ@zoetis.com

   **Postal address:** Privacy officer/Legal department
   PO Box 6066
   Silverwater NSW 2138
   Australia

15.2 Upon receipt of a written complaint regarding a suspected breach of your privacy, Zoetis will provide a response within 30 days advising you of the next steps (if any) regarding your complaint.