



Privacy Policy

Paragon Care Limited

ACN 064 551 426

1. Introduction

- 1.1. Paragon Care Limited and its subsidiary companies (collectively referred to as the “Company”, “PGC”, “we”, “our”, “us”) recognises the importance of privacy and is committed to protecting your privacy when handling your personal information. From the outset, it should be noted that all information or opinions about you as an identified, or reasonably identifiable, individual that is in the Company’s control is handled and managed with the utmost care.
- 1.2. This Privacy Policy (the “**Policy**”) sets out how the Company will collect, hold, use, disclose, manage, protect and otherwise handle your personal information in accordance with the Australian Privacy Principles (“**APPs**”) contained in the *Privacy Act 1988* (Cth) (“**Privacy Act**”).

2. Application

- 2.1. This Policy applies to all personal information collected by the Company, including from:
 - (a) job applicants, contractors, shareholders, customers, and suppliers of the Company; and
 - (b) visitors to the Company’s website or premises.
- 2.2. Unless a specific exception is expressed, this Policy is mandatory across all Company subsidiaries.

3. What is personal or sensitive Information?

- 3.1. **Personal information** is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether that information or opinion is true or not and whether the information or opinion is recorded in material form or not.
- 3.2. **De-identified information** is information that has been appropriately de-identified such that is no longer about an identifiable individual or an individual who is reasonably identifiable.
- 3.3. **Sensitive information** is personal information that is given a higher level of protection in the Privacy Act. It includes health, genetic and biometric information and templates. It also includes information about race or ethnic origin, political opinions, membership of political, professional or trade associations or trade unions, religious and philosophical opinions, sexual orientation or practices, and criminal record.
- 3.4. In this Privacy Policy when we talk about personal information, we include sensitive information.

4. Why do we collect personal information or sensitive information?

- 4.1. The Company collects personal information so that we can provide services to our customers, and comply with our legal obligations.
- 4.2. The Company collects personal information for the purposes set out in this Policy and as notified to you at the time of collection.
- 4.3. The Company will collect personal information about you through our interactions with you and we will typically inform you about the purpose and use of the collected information.
- 4.4. We typically collect personal information for the following purposes:
 - (a) **operational purposes:** including workforce management, safety compliance, contract management and execution, product improvement, complaint handling and the day-to-day operation of our business;
 - (b) **regulatory compliance:** including ASX reporting obligations, environmental regulations and other applicable laws;
 - (c) **investor relations:** including shareholder communications, dividends, and company announcements;
 - (d) **commercial activities:** including sales calls or follow-up meetings with our sales representatives;
 - (e) **updates:** notifying you about information relevant to our goods and services;
 - (f) **communication with third parties:** including communication with related entities, business or commercial partners (including the Company's share registry) and professional advisers in connection with our business operations and the development and sale of our goods and services; and
 - (g) **analytics:** monitoring your use of our website and services.
- 4.5. In respect of job applicants, the Company may collect information included in your résumé, publicly available online profiles, from pre-employment tests, and / or provided through background checks. These may also include opinions from referees and criminal background checks which are obtained with your consent.

5. What kinds of personal information do we collect?

- 5.1. The types of personal information which we may collect and hold include, without limitation:

General Information

- (a) your name;
- (b) address, email and other contact details;
- (c) date of birth;
- (d) identification documents (i.e. passport, driver's license or national ID)
- (e) tax file number (TFN); and
- (f) payment or financial information (i.e. banking details).

Technical and Website Data

- (a) IP addresses, device identifiers, and browsing history on our website.
- (b) cookies and analytics data for site personalisation, monitoring and optimisation.

5.2. Generally, the Company will not collect sensitive information about you unless the information is reasonably necessary for one or more of our functions or activities. If the Company needs sensitive information, we will ask for your consent when we collect this information, tell you how the information will be used, and comply with the requirements of the Privacy Act.

6. How do we collect personal information?

Collecting information from you

- 6.1. How the Company collects your personal information will largely depend on whose information it is collecting. If it is reasonable and practicable to do so, the Company will collect personal information directly from you.
- 6.2. Depending on how you choose to interact with the Company, the Company may collect your personal information when you contact the Company or its service providers in person, by telephone, by email, through the Company's website or when you complete a form or document and provide it to the Company.

Collecting information from third parties

- 6.3. The Company may also collect information about you from other people (eg. a third-party administrator) or independent sources. For example, the Company may collect personal information about you from its services providers, including the Company's share registry, (Computershare Investor Services Pty Limited). However, the Company will only do so where it is not reasonable and practicable to collect the information from you directly. Where the

Company has collected your information from a third party, such personal information will be held, used and disclosed by the Company in accordance with this Privacy Policy.

- 6.4. When you provide the Company with personal information you consent to the use, disclosure and handling of your personal information in accordance with this Privacy Policy and any subsequent amendments.

Collecting information from visits to the Company's website

- 6.5. The Company may collect information based on how you use its website including through 'cookies', web beacons and other similar technologies. Cookies are small text files that websites or apps may place on your computer or device and collect information about the users of its website such as the number of visitors, the number of pages viewed and the sources which bring visitors to the website.
- 6.6. The Company uses cookies to provide you with a more consistent experience across our services and reserves the right to ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or the third party. This information is collected to analyse and improve the Company's website, its marketing campaigns and to record statistics on web traffic.
- 6.7. We record a variety of information from interactions with our online services including IP address, location data (where available and not disabled by the user), dates, times, and other user activity. In most cases we will not be able to reasonably identify an individual from the information collected unless you are logged in. However, if cookie information is linked with personal information we hold about you as set out above, this cookie information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.
- 6.8. You can remove or reject cookies by adjusting the settings on your web browser.

Unsolicited information

- 6.9. If the Company receives personal information that it has not requested, or it determines that the personal information received is not reasonably necessary to provide its services, the Company will take reasonable steps to de-identify or destroy that personal information.

7. How we hold and secure your personal information?

- 7.1. The security of your personal information is of paramount importance to the Company and it takes reasonable steps (including through technical and organisational measures) to protect the personal information it holds about you from misuse, loss, unauthorised access, modification or disclosure. The Company has a number of safeguards in place to protect the personal information we hold, including password protected databases, staff training and system firewalls. The Company maintains password security and restricted access to all electronic

documents containing personal information and stores hard copy documents in secured locations.

- 7.2. If the Company transmits your personal information over the internet (including to third parties who hold data outside Australia) we will take reasonable steps to maintain the security of any personal information to prevent misuse and unauthorised access modification or disclosure. Despite these protection mechanisms, you should be aware there are inherent risks associated with the transmission of data over the internet and we cannot guarantee any transmission will be completely secure.
- 7.3. The Company will take reasonable steps to destroy or de-identify personal information if it is no longer needed for a purpose for which the information is used or disclosed, unless the Company is otherwise required by law to retain the information.

8. How do we use and disclose your personal information?

- 8.1. We may use and disclose your personal information for the primary purpose for which we collected your personal information (including as specified in section 4.4 above), or where required or authorised by law,, including but not limited to:
 - (a) where you have provided your consent;
 - (b) where such use is related to the primary purpose and you would reasonably expect us to use or disclose the information for that other purpose;
 - (c) in the case of direct marketing not related to our activities - we have obtained your prior consent (unless it is not reasonably practicable to seek your consent and we otherwise comply with the requirements of the Privacy Act); or
 - (d) the use or disclosure is otherwise permitted by or required to comply with any relevant laws, regulations, codes or practice and court orders.
- 8.2. We will not use or disclose personal information for the purposes of direct marketing to you unless:
 - (a) you have consented to receive direct marketing materials;
 - (b) you would reasonably expect us to use your personal details for this purpose; or
 - (c) we believe you may be interested in the material but it is impractical for us to obtain your consent.
- 8.3. Where we engage in direct marketing, you may at any time request us not to provide you with any further direct marketing communications by contacting us via the details set out below. Where required by law, we will include an unsubscribe option for you to elect to receive no further marketing communications (eg by mail, email, phone or SMS).

- 8.4. Please note also that even if you have requested not to receive further direct marketing communications, we may nevertheless continue to provide you with information about changes to our terms and conditions for the supply of goods or services, questionnaires and other factual information, where such communication is not regarded as 'direct marketing' under the Privacy Act.
- 8.5. Further details on our disclosures to third parties are set out in section 9 below.
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9. How is personal information disclosed to others?

- 9.1. The Company does not sell, rent or trade personal information to, or with, third parties.
- 9.2. The Company's website may contain links to other websites. The Company does not share your personal information with those websites, and it is not responsible for their privacy practices.
- 9.3. In some circumstances your personal information may be disclosed to third party service providers that perform a range of services on behalf of the Company including:
- (a) mailing houses and printing companies;
 - (b) auditors, solicitors and other legal and professional advisers;
 - (c) registry providers (including Computershare Limited);
 - (d) information technology vendors;
 - (e) outsourced service providers (including payroll service providers); and
 - (f) other consultants.
- 9.4. Some third parties with whom we share personal information may be located outside of Australia. It is not practicable for us to specify in advance the location of every third party with whom we deal, however, personal information may be stored and processed in locations including Malaysia, Indonesia, Hong Kong, Singapore, Vietnam, Japan, Thailand, South Korea and the Philippines.
- 9.5. Where the Company discloses your personal information to its service providers, we will take reasonable steps to ensure that they only use personal information in order to perform the functions required by the Company and in accordance with applicable law.
- 9.6. The Company may also disclose your personal information to law enforcement agencies, courts or government agencies and other regulatory authorities (such as the ASX) where authorised by, or required to comply with specific legal requirements. In particular, the *Corporations Act 2001* (Cth) requires certain information about you to be included in the Company's registers which are able to be accessed by the public.

10. Ensuring your personal information is up-to-date

- 10.1. It is important that the personal information we collect from you is accurate, complete and up-to-date.
- 10.2. During the course of our relationship with you, we will ask you to tell us of any changes to your personal information.
- 10.3. You also have a right to correct your personal information, and you can contact us at any time to update your personal information or to tell us that the information we hold about you is inaccurate or incomplete.
- 10.4. To exercise these rights, contact us as detailed below.

11. Access and Correction

- 11.1. You have a right to request access to your personal information held by us. We will provide you with access to your personal information held by us, unless we are permitted by law to refuse to provide you with such access. If we refuse access, we will provide you with a written notice explaining our reasons for doing so and available complaint mechanisms. Please contact us on the details below if you:
 - (a) wish to have access to the personal information which we hold about you; or
 - (b) require further information on our personal information handling practices.
- 11.2. We may require you to verify your identity before we provide you with access to your personal information. We will not charge you for requesting access to your personal information, but we may require you to meet our reasonable costs in actually providing you with access.
- 11.3. As mentioned above, you also have a right to correct your personal information that is inaccurate, out-of-date, incomplete, irrelevant or misleading, having regard to the purposes for which the information is held. We will take reasonable steps to respond to your request and will promptly correct any information where necessary.

12. Enquiries and complaints

- 12.1. Individuals who believe that we have breached their privacy rights in any way or wish to discuss any issues about our Policy, should contact us on the details below so that we can try to satisfy any questions and correct any errors on our part. All correspondence should be directed to us on:

Tel: 1300 369 559

E-Mail: info@paragoncare.com.au

Mail: Paragon Care Limited
77-97 Ricketts Road
Mount Waverley VIC 3149

- 12.2. If you believe that the Company has not protected your personal information as set out in this privacy policy or has denied you access to your personal information in potential breach of the Privacy Act, you may lodge a complaint by writing directly to the Company. We will endeavour to respond to your request within 30 days. All such complaints will be handled with the appropriate discretion.
- 12.3. If you are not satisfied with the result of your complaint to the Company or if your complaint remains unresolved, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner (**OAIC**) online at www.oaic.gov.au or by calling 1300 363 992 to have the complaint heard and determined.

13. Changes to this Policy

- 13.1. From time to time, we may change our policy on how we handle personal information or the sort of personal information which we hold. Any changes to our policy will be published on our website at www.paragoncare.com.au.
- 13.2. By continuing to use the Company's services you will be deemed to have accepted the terms and condition of this Policy.

14. Review of this Policy

- 14.1. This Policy cannot be amended without approval from the Company's Board.
- 14.2. This Policy will be reviewed every two years or as often as may be required, to ensure it remains effective and meets the best practice standard and the needs of the Company.
- 14.3. The Policy will be available on the Company's website within a reasonable time after any such updates or amendments have been approved.

15. Approved and Adopted

- 15.1. This Policy was approved and adopted by the Board on 29 April 2026.