

Innovatus Technology Pty Ltd (ACN 155 640 181) Privacy Policy

Last Updated and Effective: June 2022

We at Innovatus Technology Pty Ltd (“**Innovatus**”, “**us**”, “**our**”, or “**we**”) are strongly committed to transparency, and we want you (“**you**” or “**your**”) to understand how we collect, use, share and protect your personal information, as well as how you can manage the personal information we collect. This Privacy Policy applies to your interactions with us, either online or offline, including your use of our websites <https://www.eyespace.com> products, services, and features (collectively, our “**Services**”).

By using our Services, you acknowledge the terms of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use our Services. If you do not understand, or if you have questions about, this Privacy Policy, please contact us before using, or continuing to use, our Services.

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1. TYPES OF INFORMATION WE COLLECT

We collect two basic types of information from you when you provide it to us or when you use or interact with our Services: personal information and non-personal information.

Personal information includes all information that relates to you or which are opinions about you personally and either identifies or may be used to identify you personally (collectively, “**personal information**”). We may only collect the following, limited types of personal information from you depending upon the device you are using and how you interact with us or use or interact with our Services, such as your:

- **Contact Information.** Name, address (including address history), email address, phone number, and other contact information.
- **Device Information.** IP address, browser type and version, browser plug-in types and versions, operating system and platform, device type, device identifiers, and information about how you use our Services.
- **Payment Information.** Credit and debit card, bank account, and other financial information necessary to send and receive payments.
- **Patient Information.** Medical, medical device, and biometric information, including images or videos of your eyes, topography data, and refractive errors. This may also include information about your eye care provider, such as the physician name, practice name, address, and email address.

We strive to uphold data minimization principles and only seek to collect personal information from you for the purposes described in this Privacy Policy. To see all of the categories of personal information we collect, [click here](#).

Non-personal information includes information that does not personally identify you or information that has been anonymized (collectively, “**non-personal information**”). When we combine non-personal information with personal information, we treat the combined information as personal information.

You can always refuse to provide your personal information, but please note that some personal information is necessary to provide our Services.

2. HOW WE COLLECT PERSONAL INFORMATION

We need to collect personal information from you in order to provide you with our Services, as well as to improve your experience. You may provide us with personal information in several ways, including, for example when you:

- Visit our website or use our Services;
- Correspond with us in any way, including through questionnaires, surveys, and job applications;
- Sign up to receive our newsletter or promotional information;
- Ask for customer service, support or other assistance; or
- Interact with us in any other way, online or offline, including through our Services.

Cookies

Like many websites and apps, we use “cookies”, which are small text files that are stored on your computer or equipment when you visit certain online pages that record your preferences and actions, including how you use the website. We use this information for analytics purposes which allows us to improve your browsing experience. The information we collect through these technologies will also be used to manage your session. Out of these cookies, the cookies that are categorised as “necessary” are stored on your browser as they are essential for the working of basic functionalities of the website. These necessary cookies cannot be disabled.

Cookie Opt-out. You can set your browser or device to refuse all cookies or to indicate when a cookie is being sent. If you delete your cookies, if you opt-out from cookies, or if you set your browser or device to decline these technologies, some Services may not function properly. Our Services do not currently change the way they operate upon detection of a [Do Not Track](#) or similar signal.

Offline Interactions and Other Sources

We also may collect personal information from other sources, such as our partners or third party service providers, or from our offline interactions with you for the purposes listed in the **How We Use Personal Information** section below, including to enable us to verify or update information contained in our records and to better customize the Services for you. For example, personal information you provide to your eye care provider may be shared with us by your eye care provider or distributor so that we may provide you with our Services.

Social Media Integration

Our Services may, from time to time, contain links to and from social media platforms. You may choose to connect to us through a social media platform, such as Facebook, LinkedIn or Twitter, and when you do, we may collect additional information from you, including the information listed in the **Types of Information We Collect** section above. Please be advised that social media platforms may also collect information from you. When you click on a social plug-in, such as Facebook’s “Like” button or Twitter’s “Tweet” button, that particular social network’s plugin will be activated and your browser will directly connect to that provider’s servers. We encourage you to review the social media platforms’ usage and disclosure policies and practices, including the data security practices, before using them.

Surveys

From time to time, and subject to your consent where required by applicable local law, we may provide you with the opportunity to participate in surveys, some of which might be sponsored or conducted by a third party. Participation in these surveys is completely voluntary. If you choose to participate, we will request certain personal information from you. If there is a third party sponsor involved in the survey, we may provide certain personal information to the third party sponsor. Please make sure to review the sponsor’s privacy policy and be aware that any surveys offered by us may be governed by specific rules and terms and conditions that are separate from and in addition to this Privacy Policy. By participating in any such surveys you will become subject to those rules, including but not limited to receiving emails containing survey communications.

3. HOW WE USE PERSONAL INFORMATION

We primarily use personal information to provide, maintain, and improve our Services, but we may also use personal information to do any or all of the following:

- facilitate your interactions and transactions with us, such as requests for support or additional Services;
- respond to your requests, communications, suggestions, comments, inquiries, and requests (including your feedback about our Services);
- administer our relationship with you;

- develop new products, features, and services;
- better understand the preferences of our customers;
- provide personalized Services, including content and ads;
- provide you with, and improve, relevant marketing offers or information from us or relevant third parties;
- facilitate your participation in our surveys and promotions;
- ensure our systems and premises are secure;
- develop and manage relationships with our business partners;
- respond to legally binding requests from law enforcement, regulatory authorities, or other third parties;
- defend, protect or enforce our rights or applicable terms of service or to fulfill our legal or contractual obligations;
- manage any dispute and accidents and take legal or other professional advice;
- to prevent fraud or the recurrence of fraud;
- assist in the event of an emergency;
- comply with applicable law; or
- any other purpose with your consent.

We may also combine your personal information collected through various sources, including information collected through our Services, and develop a customer profile that will be used for the purposes above.

If you are a job applicant, we will use your personal information as necessary to determine your fitness for the position applied for, to make any relevant adjustments during the recruitment process, and for equal opportunities monitoring.

Except as otherwise permitted or required by applicable law, we only retain personal information for as long as we need to use the information for the purposes listed above, including, for legal, regulatory, backup, archival, accounting, and/or audit purposes.

We may use personal information to create non-personal information. We may use non-personal information for any legitimate business purpose.

4. HOW WE SHARE PERSONAL INFORMATION

We do not sell or rent personal information.

We only share personal information in limited circumstances. For example, we may share personal information with our third party service providers, suppliers, vendors, professional advisors and business partners, which may include IT service providers, financial institutions and payment providers, customer relationship management vendors, other cloud-based solutions providers, lawyers, accountants, auditors and other professional advisors. We contract with such vendors and advisers to ensure that they only process your personal information under our instructions and ensure the security and confidentiality of your personal information. We share personal information with these third parties to help us:

- with the uses described in the **How We Use Information** section above;
- in the operation, management, improvement, research and analysis of our Services;
- with our marketing and promotional projects, such as sending you information about products and services you may like and other promotions (provided you have not unsubscribed from receiving such marketing and promotional information from us); and
- comply with your directions or any consent you have provided us.

We may share personal information with law enforcement and regulatory authorities or other third parties as required or permitted by law for the purpose of:

- responding to a subpoena, court order, or other legal processes;
- defending, protecting, or enforcing our rights;
- assisting in the event of an emergency; and

- complying with applicable law.

If you are a job applicant, we may share your personal information with employment/recruitment agencies or background screening providers as party of the recruitment process.

In accordance with applicable law, we may also transfer or assign personal information to third parties as a result of, or in connection with, a sale, merger, consolidation, change in control, transfer of assets, bankruptcy, reorganization, or liquidation. If we are involved in defending a legal claim, we may disclose personal information about you that is relevant to the claim to third parties as a result of, or in connection with, the associated legal proceedings.

To see all of the categories of personal information we share, [click here](#).

We share non-personal information with third parties as reasonably necessary to meet our business needs.

5. HOW WE PROTECT PERSONAL INFORMATION

We are dedicated to ensuring the security of your personal information. We use physical, electronic, and administrative security measures appropriate to the risks and sensitivity of the personal information we collect. We aim to provide secure transmission of your personal information from your devices to our servers. We have processes to store personal information that we have collected in secure operating environments. Our security procedures mean that we may occasionally request proof of identity before we disclose your personal information to you. We try our best to safeguard personal information once we receive it, but please understand that no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. If you suspect an unauthorized use or security breach of your personal information, please [contact us](#) immediately.

6. DATA TRANSFERS

We are a global business. As such, information we collect may be transferred to, stored, and processed in any country or territory where one or more of our business partners or service providers are based or have facilities which may be a different to your home country. While other countries or territories may not have the same standards of data protection as those in your home country, we will continue to protect personal information that we transfer in line with this Privacy Policy requiring that our business partners or service providers adhere to this Privacy Policy and the applicable privacy regulations in your home country.

7. CHILDREN'S PRIVACY

Our Services are not for children or those under the age of 16. We do not knowingly collect personal information from children or other persons who are under 16 years of age. Individuals who are children or those under the age of 16 should not attempt to provide us with any personal information. If you think we have received personal information from children or those under the age of 16, please [contact us](#) immediately.

8. YOUR CALIFORNIA PRIVACY RIGHTS

We do not share personal information with third parties for their own direct marketing purposes without your consent. California residents under 18 years old, in certain circumstances, may request and obtain removal of personal information or content that you have posted on our Services. Please be mindful that this would not ensure complete removal of the content posted by you on our Services. To make any request pursuant to California privacy law, please [contact us](#).

9. YOUR CHOICES

We offer you certain choices in connection with our Services.

Access to your personal information

You have the right to request access to the personal information that we collect, use, and disclose about you. You also have the right to not receive discriminatory treatment for exercising your access right. To submit a request or designate an authorized agent to make a request, please [contact us](#) using the information below.

Deleting your personal information

You have the right to request that we delete your personal information, subject to some exceptions under applicable law. Once we have received and confirmed your request, we will delete (and direct our partners and service providers to delete) your personal information, unless an exception under applicable law applies. You have the right to not receive discriminatory treatment for exercising your deletion right. To submit a request or designate an authorized agent to make a request, please [contact us](#) using the information below.

Updating your personal information

The accuracy of the personal information we have about you is very important. To submit a request to update or correct your information, please [contact us](#) using the information below.

Email Communications / Direct Marketing

You may have the opportunity to receive certain communications from us related to our Services. If you provide us with your email address in order to receive communications, you can opt-out of marketing emails at any time by following the instructions at the bottom of our emails and adjusting your email preferences. Please note that certain emails may be necessary for the operation of our Services. You will continue to receive these necessary emails, if lawful and appropriate, even if you unsubscribe from our optional marketing communications.

Cookies / Beacons

If you wish to minimize information collected by cookies or beacons, you can adjust the settings of your device or browser. You can also set your device or browser to automatically reject any cookies. You may also be able to install plug-ins and add-ins that serve similar functions. However, please be aware that some Services may not work properly if you reject cookies. In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.

Network Advertising Initiative

Certain websites you visit may provide options regarding advertisements you receive. If you wish to minimize the amount of targeted advertising you receive, you can opt-out of certain network advertising programs through the Network Advertising Initiative (NAI) Opt-Out Page or through the Digital Advertising Alliance Opt-Out Tool. Please note that even if you choose to remove your personal information (opt-out) you will still see advertisements while you're browsing online. However, the advertisements you see may be less relevant to you. For more information or to opt-out of certain online behavioral advertising, please visit <http://www.aboutads.info>.

Additionally, many advertising network programs allow you to view and manage the interest categories that they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The NAI Opt-Out Page provides a tool that identifies its member companies that have cookies on your browser and provides links to those companies.

Do Not Track

Some devices and browsers support a "Do Not Track" (or, DNT) feature, a privacy preference that you can set in certain browsers, which is intended to be a signal to websites and services that you do not wish to be tracked across different websites or online services you visit.

Please note that we cannot control how third party websites or online services you visit through our website respond to Do Not Track signals. Check the privacy policies of those third parties for information on their privacy practices. Our Services do not currently change the way they operate upon detection of a [Do Not Track](#) or similar signal.

10. THIRD PARTY WEBSITES AND APPS

Our website and Services may contain links to other websites or apps operated by third parties. Please be advised that the practices described in this Privacy Policy do not apply to information gathered through these third party websites and apps. We have no control over, and are not responsible for, the actions and privacy policies of third parties and other websites and apps.

11. CONTACT US

If you have questions about our Privacy Policy or privacy practices, wish to provide feedback about this Policy or would like to access or correct your personal information held by Innovatus, please contact our Chief Compliance Officer at:

Email: DataSecurityandPrivacy@eye.space

12. CHANGES

We may change this Privacy Policy. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on this page. Your use of the EyeSpace website following these changes means that you accept the revised Privacy Policy. We recommend that you regularly review the Privacy Policy when you visit the EyeSpace website. This policy was last updated in June 2022

California Privacy Law Appendix

This appendix seeks to provide additional information to residents of California and supplements the information provided in the Privacy Policy above.

To learn more about the categories of personal information we collect, how we collect it, why it is collected, with whom we share the information, and how long we retain it, please see the chart below.

Category	What we collect	How we collect it	Why we collect it	With whom we share it	How long we retain it
Identifiers	Name, mailing address, email address, phone number, payment information, and other contact information. For more information please see the Types of Information We Collect section above.	Collected online or offline when you directly provide it to us, through your use of our Services, or from third parties.	We collect this information for the purposes listed in the How We Use Information section above.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Information section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the How We Use Information section above.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, mailing address, email address, phone number, payment information, and other contact information. For more information please see the Types of Information We Collect section above.	Collected online or offline when you directly provide it to us, through your use of our Services, or from third parties.	We collect this information for the purposes listed in the How We Use Information section above.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Information section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the How We Use Information section above.
Protected classification characteristics under California or federal law	Not collected.	N/A	N/A	N/A	N/A
Commercial information	Transactional information such as the products or services purchased. For more information please see the Types of Information We Collect section above.	Collected online or offline when you directly provide it to us, through your use of our Services, or from third parties.	We collect this information for the purposes listed in the How We Use Information section above.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Information section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the How We Use Information section above.

Biometric information	Eye and retinal scans. For more information please see the Types of Information We Collect section above.	Collected online or offline when you directly provide it to us, through your use of our Services, or from third parties.	We collect this information for the purposes listed in the How We Use Information section above.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Information section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the How We Use Information section above
Internet or other similar network activity	IP address, browser type and version, browser plug-in types and versions, operating system and platform, device type and device identifiers For more information please see the Types of Information We Collect section above.	Collected online when you directly provide it to us, through your use of our Services, or from third parties.	We collect this information for the purposes listed in the How We Use Information section above.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Information section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the How We Use Information section above
Geolocation data	IP address. For more information please see the Types of Information We Collect section above.	Collected online when you directly provide it to us, through your use of our Services, or from third parties.	We collect this information for the purposes listed in the How We Use Information section above.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Information section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the How We Use Information section above
Sensory data	Images and videos. For more information please see the Types of Information We Collect section above.	Collected online or offline when you directly provide it to us, through your use of our Services, or from third parties.	We collect this information for the purposes listed in the How We Use Information section above.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Information section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the How We Use Information section above
Professional or employment-related information	Eye care provider-related information. If you apply for a position with us, we may collect employment history and other resume-related information. For more information please see the Types of Information We Collect section above.	Collected online or offline when you directly provide it to us, through your use of our Services, or from third parties.	We collect this information for the purposes listed in the How We Use Information section above.	Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Information section above.	We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the How We Use Information section above
Non-public education information	If you apply for a position with us, we may collect	Collected online or offline when you directly provide	We collect this information for the purposes listed in	Shared with our affiliates, partners,	We retain information for as long as necessary for

	<p>information about your educational history.</p> <p>For more information please see the Types of Information We Collect section above.</p>	<p>it to us, through your use of our Services, or from third parties.</p>	<p>the How We Use Information section above.</p>	<p>vendors, and service providers as described in the How We Share Information section above.</p>	<p>the purpose for which it was initially collected, including the purposes listed in the How We Use Information section above</p>
<p>Inferences drawn from other personal information</p>	<p>Information generated from your use of our Services reflecting your preferences</p>	<p>Collected online or offline when you directly provide it to us, through your use of our Services, or from third parties.</p>	<p>We collect this information for the purposes listed in the How We Use Information section above.</p>	<p>Shared with our affiliates, partners, vendors, and service providers as described in the How We Share Information section above.</p>	<p>We retain information for as long as necessary for the purpose for which it was initially collected, including the purposes listed in the How We Use Information section above</p>