



## BSD PORTAL - PRIVACY POLICY

**THIS POLICY DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU AND YOUR PATIENTS MAY BE COLLECTED AND USED. PLEASE REVIEW IT CAREFULLY.**

IN RELATION TO INFORMATION WHICH YOU COLLECT FROM YOUR PATIENT AND PROVIDE TO US ON THEIR BEHALF: THERE ARE VARIOUS 'PATIENT CONSENT' CHECKS DURING THE PROCESS OF 'CREATING A PRESCRIPTION'. FOR FULL TRANSPARENCY, PLEASE MAKE YOUR PATIENT AWARE OF THESE TO ALLOW YOU TO PROVIDE THEIR DATA IN THE BSD PORTAL.

### ABOUT US

We operate the 'BSD Connection' portal (Portal) for use by qualified medical practitioners (including their approved medical clinic staff) and other health professionals authorised to write prescriptions for their patients. The 'BSD Connection' Portal offers these 'services':

- enables the creation of prescriptions by prescribers;
- conveys these prescriptions to a Pharmacy which is able to compound the medication;
- produces the requisite documentation for export of the medicine directly to the patient; and
- provides tracking information to patients during the manufacturing and delivery processes.

### WHY DO WE COLLECT INFORMATION?

When you access and use our Portal, we collect and hold information required to fulfill BSD's role as a facilitator of ordering, manufacture and shipping of medicine to your individual patients. We must therefore collect information about prescribers/doctors (and on occasion, staff delegated as 'authorised to represent') and also information about patients, usually obtained by the prescriber during a patient's appointment. At such times, the prescriber is required to seek explicit consent from the patient for the collection and use of the data for the purpose for which it is collected.

Categories of information include contact information, health and medicines information, payment information, and general information to help us fulfill and improve our services – collected in relation to prescribers and/or their patients.

We process the collected information based on legitimate interests—such as fulfilling services, improving services and portal functionality.

If you, or your patient, chooses not to provide the requested information, it may impact our ability to deliver our services fully.

Additionally, we may collect other types of information from you to further tailor and improve our offerings, whilst adhering to requirements under relevant regulations.

## HOW DO WE COLLECT INFORMATION?

In many instances, we collect personal information about you or your patients directly from you. Here are some of the main ways.

- When you register on the portal
- When you authorise a staff member to use the portal on your behalf
- When you create a patient profile
- When you create a prescription
- If you communicate with us through correspondence, phone call, questionnaire/surveys, chats, email or the “Contact Us” form on the portal.

## WHAT DO WE COLLECT & WHEN DO WE DISCLOSE IT?

*We must disclose medical or other information about prescribers or patients if ever mandated to do so by federal, state, or local law or regulations.*

### WHAT WE COLLECT FROM THE PATIENT

This may include information about the patient that is identifiable. For example: name, address, age or date of birth, contact number and email address, and information about physical or medical conditions, history, treatments, medications, allergies and prescriptions.

- *To enable a pharmacy to provide prescription drugs and to have the pharmacy be informed of any medical information which is pertinent to the medicines being supplied:* we collect and pass on to the pharmacy a patient’s personal and medical information, including prescriptions issued by you, and other details about the patient’s medical status/history and other medications they may be taking.
- *For the purpose of generating documents required by Customs/Border Patrol and Shipping company for the personal importation of medicine:* we collect various affirmations as to the intended use of the medicine, the dosage and duration of the medicine, and the condition and treatment details.

- *To notify a patient regarding the status of their medicine in the shipping and delivery process:* we collect the patient's personal contact information including phone number, address/es for shipping or communications, and we may provide this to the pharmacy, shipping company and delivery fulfilment company.
- *To ensure authorised collection of patient information which will enable manufacture of medicine, and which are required by Customs authorities during the (export and) personal importation process:* the doctor is required to seek permission to confirm various patient consents during the creation of a prescription, including permission to enter an electronic signature on behalf of the patient.

### **WHAT WE COLLECT FROM THE DOCTOR/PRESCRIBER**

This may include information about the prescriber that is reasonably identifiable. For example: name, address, age or date of birth, contact number and email address, and information about your physical business location. We may also collect information relating to your qualifications and registrations for the purposes verifying your status as a qualified medical practitioner and verifying your identity through an authentication process for each occasion of login after you have registered. We collect for these purposes:

- *To enable communications required for the provision of our services including tracking of the delivery status of orders:* we may use contact information for each authorised user of the portal and for their patients awaiting product delivery.
- *To bill and receive payment from prescribers for services, or to issue a credit note or refund:* we may use and disclose information including credit card information and bank account details.
- *To improve our service provision and our access to relevant industry information:* we may collect information about the industry organisations and networks of which prescribers are a member/subscriber. To the extent that this information may be required in our dealings with those networks, we will redact identifying details.
- *To inform of possible treatment options or alternatives that we believe may be of interest to prescribers:* we may reference medical information which prescribers have entered into the portal regarding patient conditions and treatments.

## **HOW DO WE PROTECT YOUR INFORMATION?**

Data protection is fundamental to our operations. We take a number of measures to keep your information safe.

Our measures include robust encryption, stringent access controls, and continuous threat monitoring. Privacy impact assessments are conducted regularly to ensure potential risks are identified and mitigated.

We implement de-identification techniques to ensure personal and health data are stripped of identifiable markers to prevent re-identification by outsiders.

We may de-identify your general personal information or your patients', and use it in aggregate form to conduct analysis on how our Portal and services are being used, to help us improve our services and provide benefits to our users. When we refer to 'de-identified' information, we mean information that has undergone a process of removing all personal identifiers that can reasonably identify you or your patients, so that there is no reasonable likelihood of re-identification occurring.

We generally hold personal information in our electronic database. We use a combination of techniques and measures to maintain the security of our portal and to protect your account and your information.

## USING OUR PORTAL

To track your portal usage and remember your preferences, our portal includes pages that use cookies - which are small files that store information on your computer, mobile phone or other device. We may use them to recognise you across devices and browsing sessions.

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. If you refuse the use of cookies in this way you may not be able to access the full functionality of our portal. Please refer to your internet browser's instructions or help screens to learn more about these functions.

We may also use third-party analytics tools to help us gather and analyse information about your use of our portal. These tools assist us in understanding usage patterns, improving user experience, and optimizing the performance of our services. For the avoidance of doubt, no Protected Health Information (PHI) or sensitive health information is shared with or transmitted to third-party analytics tools for these purposes. Any information collected through these tools is limited to non-sensitive data and does not include any details that could identify patients or relate to their health conditions, treatment, or care.

## WHAT ARE YOUR RIGHTS IN RELATION TO YOUR INFORMATION?

You have rights in relation to your personal information. You can contact us to exercise any of your rights in relation to your information.

You can ask us about:

**Access**

You can request a copy of your information.

**Correct / Erase**

You can ask us to correct, update or erase your information. Please note that updates and erasures may impact the ability of your prescriber and the portal to provide services to you.

**Complaint**

You can express your concerns or complaints to us about your privacy or the way we are handling your information. We take your concerns seriously and will seek to fix any problem as soon as possible.

If you believe that your privacy rights have been violated, or you have a concern, you may make an enquiry or file a complaint via [info@bsdconnection.com](mailto:info@bsdconnection.com) or through the “Contact Us” form on the portal.

When you contact us regarding a request for access, correction, erasure, or to make a complaint, please include your name and contact details (such as email address and phone number) and clearly describe your request. We are committed to addressing your enquiries promptly and will acknowledge receipt of your correspondence swiftly. We aim to formally respond to all requests within 30 days. If we are unable to fulfill your request due to legal or other reasons, we will explain why. Verification of your identity may be required to protect your information and ensure it is not disclosed improperly.

If you are not satisfied with how we handle your query or manage your patient’s information, you have the right to lodge a complaint with the Office for Civil Rights (OCR) at the U.S. Department of Health and Human Services (HHS). The OCR enforces the Health Insurance Portability and Accountability Act (HIPAA), which protects patient health information.

**How to File a Complaint:**

1. Online: Submit a complaint through the OCR Complaint Portal  
[https://ocrportal.hhs.gov/ocr/cp/complaint\\_frontpage.jsf;jsessionid=9EAFCDCEFA DC1DECE7092DF979E4C7DF9](https://ocrportal.hhs.gov/ocr/cp/complaint_frontpage.jsf;jsessionid=9EAFCDCEFA DC1DECE7092DF979E4C7DF9)
2. Mail or Fax: Download the complaint form from the HHS website  
[https://ocrportal.hhs.gov/ocr/cp/wizard\\_cp.jsf](https://ocrportal.hhs.gov/ocr/cp/wizard_cp.jsf) and send it to the listed address or fax number.
3. Email: Send the completed complaint form to [OCRComplaint@hhs.gov](mailto:OCRComplaint@hhs.gov).

If a complaint relates to a privacy breach, it must be filed within 180 days of that breach, though extensions may be granted for good cause.

**Right to Notification of Breach.** In the event of a breach which is beyond our control, we may be obligated to notify you (and your patient) if we become aware that the patient’s

medical information has been improperly disclosed or otherwise subject to a “breach” as defined in and/or required by applicable law.

## CHANGES TO THIS POLICY

If we need to change this policy in a way that affects the way we handle yours or your patient’s information, we will communicate this with you. We encourage you to check our portal periodically (see the main menu - **FAQs: Legal & Compliance**) to ensure that you are aware of our current Privacy Policy.

We reserve the right to change this Notice at any time, along with our privacy policies and practices. We reserve the right to make the revised or changed Notice effective for medical information we already have about you as well, as any information we receive in the future. We will post a copy of the current notice, along with an announcement that changes have been made, as applicable, on our portal. When changes have been made to the Notice, you may obtain a revised copy by writing to [info@bsdconnection.com](mailto:info@bsdconnection.com).

**Effective:** March 2025