

# Privacy Policy



## 1. COMMITMENT TO PRIVACY

Ezidebit Pty Ltd and its related entities (**"Ezidebit", "we" or "us"**) are committed to protecting the personal information of our customers. We understand that our customers are concerned about their privacy and the confidentiality and security of information. Ezidebit collects, holds, uses and discloses personal information in accordance with this Privacy Policy.

You may choose not to give us your personal information. However, if we do not collect your personal information, we may not be able to provide you with our services.

## 2. COLLECTION OF PERSONAL INFORMATION

### 2.1 What kinds of personal information do we collect and hold?

- The types of personal information that we collect and hold may include:
  - Information identifying you – such as your name, date of birth, driver's license number (or the number and details of other types of identification, such as a passport or proof of age card).
  - Contact details – such as your address, telephone number, fax number, email address.
  - Billing details – such as the billing name and address.
  - Financial details – such as credit card and bank account details.
  - Information about your business or which identifies the people who work for or are associated with your business (for example, employees, directors, authorised representatives, partners or trustees).
  - Information we are required or authorised by law to collect.

### 2.2 How do we collect and hold the personal information?

If you are a merchant, or applying to Ezidebit for merchant services, we collect personal information in connection with our services when:

- you register or complete an application for payment services;
- you enter details through the Ezidebit website;
- you exchange information through our Application Interface;
- a third party engaged by you (such as a website developer or software provider) contacts Ezidebit on your behalf;
- you use software or any other electronic application which has been integrated with Ezidebit to enable us to provide you with merchant services;
- you communicate with us via phone or email;
- you make changes on your account with us; and
- we engage a third party provider (such as an identity or risk verification service) to perform checks on you.

If you are a payer, sources of personal information may include:

- you, when you communicate with us via phone or email, conduct an online transaction or complete an authority to process a debit to your account;
- recipients of your payments;
- providers of software or any other electronic applications which have been integrated with Ezidebit to enable us to process payments for users of that software or application; and
- your financial institution.

Ezidebit also collects personal information in relation to our business partners and suppliers. In these circumstances sources of personal information may include:

- you, when you communicate with us in person or via phone or email;
- tender responses or other material you submit to us; and
- third party providers we engage (such as an identity or risk verification service) to perform checks on you.

Regardless of whether you are a merchant, payer, business partner or supplier, we may also collect personal information in relation to you when:

- you enter into an Ezidebit promotion;
- you accept or follow links to our website and mobile apps; and
- you follow us through social media or post to one of our social media sites.

Ezidebit may also receive personal information from third parties (such as business partners) who have agreed to share their customer or marketing lists with us.

We may monitor and record your telephone calls to us for quality, training, dispute resolution and security purposes.

## **2.3 Cookies**

Cookies are small pieces of information, stored in simple text files, placed on your computer by a website. Some cookies can be read by the website on your subsequent visits. The information stored in a cookie may relate to your browsing habits on the webpage, or a unique identification number so that the website can 'remember' you on your return visit. Other cookies are deleted when you close your browser and only relate to the working of the website.

Cookies may be set when you first visit our website.

Most browsers allow you to turn off cookies or to customise your settings for cookies. To find out how to do this, see the 'Help' menu on your browser. Please note that if you turn off cookies or change your settings, some features of our website may not work correctly.

In many cases, the tools used on our website record information in a way that does not identify you as an individual. In other cases, information may be personal information in which case this Privacy Policy will apply. Section 2.2 of this Privacy Policy provides examples of when personal information may be collected through our Website.

## **3. USE AND DISCLOSURE**

### **3.1 What are the main reasons we collect, hold, use and disclose personal information?**

If you are a merchant or applying for merchant services, or if you are a payer, we collect your personal information that is necessary for the purpose of operating our business and providing our services to you, including confirming your identity, confirming accuracy of information provided to us, confirming your authority to act on an account, processing payments, sending notices about transactions, resolving disputes, collecting fees, minimising risks and helping detect, prevent and remedy fraud and other illegal activities (including in the course of investigations conducted by government bodies), providing access to the Ezidebit website, enabling us to contact you in the course of providing our services and/or providing you with a bill for using our services.

If you are a merchant or applying for merchant services, we may also collect personal information required by the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

When we share your information with third parties whom we partner with to provide our services (for example, providers of software or any other electronic applications which have been integrated with Ezidebit to enable us to process payments for users of that software or application), those third parties may use that personal information to provide marketing communications and targeted advertising to you.

If you are a supplier or business partner, we collect we collect your personal information that is necessary for the purpose of operating our business and providing our services to merchants and payers, as well as receiving products or services from your and conducting due diligence on you and your products or services.

### **3.2 How we share your personal information with other parties**

We may disclose your personal information to your bank or financial institution and other financial institutions involved in the payment process. If you are a payer we may disclose your personal information to the recipient of your payment and if you are a merchant, we may disclose your personal information to the payer.

We may disclose your personal information to third party contractors of Ezidebit to facilitate the delivery of our services or improve the quality of our services to you, to confirm your identity, diagnose technical problems, administer the Ezidebit website and carry out maintenance, repairs and develop our computer software and hardware.

Your account, financial and billing information (including any changes to or corrections of such) may also be made available to providers of software or any other electronic applications which have been integrated with Ezidebit to enable us to process payments for users of that software or application or to our intermediaries to manage accounts processing.

We may also disclose your personal information to third parties, such as advisors, lawyers, accountants, or resellers who sell our services, including to debt collection agencies for the purposes of collecting debts, to third parties for fraud prevention and risk management, to law enforcement agencies or to government bodies. We disclose personal information to our related companies for services they provide to us, for oversight of our operations and where it is of relevance to their own operations. We may also disclose your personal information to acquirers (or potential acquirers) of all or any part of our business, or in order to run the business or part of the business acquired.

We may disclose your personal information to our related companies or to third parties located outside of Australia, including:

- The United States;
- New Zealand;

- Philippines;
- The United Kingdom; and
- Hong Kong.

Ezidebit may also use or disclose any of your personal information for other purposes and/or to other persons as required or permitted by law.

#### 4. USE OF PERSONAL INFORMATION FOR DIRECT MARKETING

We may provide marketing communications and targeted advertising to you on an ongoing basis by telephone, electronic messages (e.g. email), online (including websites and mobile apps), by mail and other means, unless or until you opt out or we are subject to legal restrictions. See the marketing materials for details of how to opt out, or contact us as set out below. We may also disclose your personal information to market research agencies, who may contact you in a similar manner to conduct market research in relation to products and services you have acquired from or are offered by us and related matters (unless or until you tell us not to).

#### 5. USE OF INFORMATION FOR GOOGLE PRODUCTS & ADVERTISING PLATFORMS

To enable us to deliver more relevant and targeted content to visitors to our website, Ezidebit has enabled Google Products and Advertising Platforms on our website. These features enable us to collect anonymous data about website visitors via Google Advertising cookies and anonymous identifiers, in addition to data collected through a standard Google Analytics implementation. These features may include but are not limited to:

- YouTube;
- Adwords;
- Google display network;
- DoubleClick Digital Marketing;
- Google Analytics; and
- Integrated services that require Google Analytics to collect data via advertising cookies and anonymous identifiers

Visitors to Ezidebit's website can opt of the Google Analytics Advertising Features we use by installing the Google Analytics Opt-out Browser Add On, available from: <https://tools.google.com/dlpage/gaoptout/>.

Further information about Google Analytics can be found at [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners).

#### 6. INTEGRITY OF PERSONAL INFORMATION

We take reasonable steps to ensure that your personal information collected is accurate, complete, relevant and up to date. If you believe that any of the personal information we hold about you requires correction, please inform us using the contact details set out below.

If you establish that the information we hold about you is inaccurate, incomplete, not up to date, irrelevant or misleading ("**Requires Correction**"), we will, after considering the

purpose for which the information is held, take reasonable steps to correct any errors and if practicable notify any third parties that Ezidebit had previously disclosed the information to of the correction. If we are not satisfied that the information Requires Correction we will, at your request, keep with your personal information a statement apparent to users of the information noting your request that the information Requires Correction.

If at any time we refuse or deny you access to your personal information or refuse to correct your personal information we will provide you with reasons for such denial or refusal.

## 7. SECURITY OF PERSONAL INFORMATION

We take reasonable steps to protect your personal information within our office and computer systems from misuse, interference, loss, unauthorised access, modification or disclosure. Depending on the circumstances, these measures may include staff authentication, access controls, encryption, records management protocols and secure premises. We store personal information in both physical and electronic form, sometimes with the assistance of third parties such as specialist data hosting providers or data centres.

## 8. ACCESS TO YOUR PERSONAL INFORMATION

### 8.1 Access to Personal Information

We will provide you with access to the information held by us in relation to you, except in circumstances where refusing you access is permitted or authorised by law.

### 8.2 Request for Access

To request access to the information held by us about you, please complete and send the completed Request Form, which is annexed to this Policy, to us using the contact details listed below. We will respond to your request within a reasonable time after the request is made and provide you your personal information in the manner requested by you, provided it is reasonable and practicable to do so. We will advise you if we will not or cannot provide you access, together with the reasons for denying you access.

### 8.3 Costs

We reserve the right to charge you for providing access to your personal information. We will notify you of those costs prior to providing you access to the information. We may require those costs to be paid prior to providing you with access.

## 9. RESOLVING YOUR PRIVACY ISSUES

### 9.1 Complaint

If you have a complaint about how we have used or disclosed your personal information, or if we have not corrected or provided you access to your personal information, then you may contact our **support team** and we will endeavour to answer your query by telephone. If we are unable to resolve the matter this way, we will provide you with a form to enable you to notify us of the details of your complaint in writing, by **email** or by post. Our contact details are provided below.

### 9.2 Our Response

Within 30 days of receipt of your complaint form, we will notify you in writing as to what action we propose to take in relation to your complaint and will provide you with details of what further action you can take if you are not satisfied with our response. If you are not satisfied with the manner in which we have dealt with your complaint, you may contact the Office of the Australian Information Commissioner. The Financial Ombudsman Service can also consider most complaints involving financial services providers.

## 10. CONTACTING US

**If you wish to contact us, please contact our Support Team:**

**Telephone:** (07) 3124 5500  
**Email:** [legal@ezidebit.com.au](mailto:legal@ezidebit.com.au)  
**Fax:** (07) 3124 5555  
**Post:** **Att: Support Team**  
**Ezidebit Pty Ltd**  
**Address: PO Box 3277**  
**Newstead QLD 4006**

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## 11. ANNEXURE

### REQUEST FOR ACCESS TO PERSONAL INFORMATION

1. Name: \_\_\_\_\_

2. Address: \_\_\_\_\_

3. Date(s) you provided us with the personal information:

\_\_\_\_\_

4. Nature of personal information provided to us:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. Please provide with me access to all personal information held by you about me. Dated this \_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_

.....

Signed

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

OFFICE USE ONLY

Proof of identity of person making request

Is proof of identity satisfactory? Yes / No

Was access provided? Yes / No

If Yes – the date was: \_\_\_\_\_

If access refused, reasons for refusal.

Date on which the individual was advised of the reasons for refusal.