

## Privacy Policy

### RESPECTING YOUR PRIVACY AND THE LAW

The privacy of your personal information has always been important to us at TradeEpay. We are committed to respecting your right to privacy and protecting your personal information.

### ABOUT THIS PRIVACY POLICY

This Privacy Policy outlines how we manage your personal information.

It also describes generally the sorts of personal information held and for what purposes, and how that information is collected, held, used and disclosed.

We encourage you to check our website regularly for any updates to our Privacy Policy.

### COLLECTING YOUR PERSONAL INFORMATION

If you are acquiring or have acquired a product or service from TradeEpay, it will collect and hold your personal information for the purposes of:

- Providing you with the relevant product or service (including assessing your application and identifying you).
- Managing and administering the product or service.
- Developing new products and services.
- Verifying your identity.
- Allowing recovery of debt.
- Managing our relationship with you and resolving disputes.
- Conducting marketing and product research.
- Responding to your queries.
- Record keeping and complying with our obligations under applicable laws and agreements.
- Protecting against fraud where it is a banking and finance product or service.

TradeEpay may also collect your personal information for the purpose of letting you know about products or services that might better serve your financial, e-commerce and lifestyle needs or promotions or other opportunities in which you may be interested.

The information collected may include your name, postal or email address, date of birth, financial details, tax file number, details of your dealings with TradeEpay clients or other information TradeEpay considers necessary.

We will, if it is reasonable or practicable to do so, collect your personal information from you. This may happen when you fill out a registration application or an administrative form, or when you give us personal information over the telephone or the TradeEpay website.

In certain cases we collect your personal information from third parties. For example, we may need to collect personal information from a credit reporting agency, your representative (such as a legal adviser), your employer or publicly available sources of information or any of the other organisations identified below under using and disclosing your personal information.

## **USING AND DISCLOSING YOUR PERSONAL INFORMATION**

We may disclose your personal information to the organisations described below. Where your personal information is disclosed we will seek to ensure that the information is held, used or disclosed consistently with TradeEpay Principles, any relevant privacy principles under state legislation and other applicable privacy laws and codes.

The Relevant Organisations Are Those:

- Involved in providing, managing or administering your product or service such as third party suppliers, other TradeEpay organisations, loyalty and affinity program partners, printers, posting services, call centres, lenders mortgage insurers and our advisers.
- Which are TradeEpay organisations who wish to tell you about their products or services that might better serve your financial, e-Commerce and lifestyle needs or promotions or other opportunities, and their related service providers, except where you tell us not to.
- Involved in maintaining, reviewing and developing our business systems, procedures and infrastructure including testing or upgrading our computer systems.
- Involved in a corporate re-organisation.
- Involved in a transfer of all or part of the assets or business of TradeEpay.
- Involved in the payments system including financial institutions, merchants and payment organisations.
- Involved in product planning and development.
- Which are your representatives including your legal advisers.
- As required or authorised by law, for example, to government or regulatory bodies for purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue.
- Where you have given your consent.

## **IN ADDITION, FOR GROUP ORGANISATIONS OFFERING:**

- Banking and finance products or services – other organisations to which personal information is usually disclosed are card producers, card schemes, credit and fraud reporting agencies, debt collection agencies, mortgage insurance companies, your guarantors, organisations involved in valuing, surveying, or registering a security property or which otherwise have an interest in such property, purchasers of debt portfolios, underwriters, re-insurers and other organisations involved in our normal business practices.
- Financial planning or broking services or personal investment products – other organisations to which personal information is usually disclosed are superannuation and managed funds organisations and their advisers, organisations in which you invest and other organisations involved in our normal business practices
- Trustee or custodial services – other organisations to which personal information is usually disclosed are superannuation and managed funds organisations and their advisers and other organisations involved in our normal business practices.
- Life insurance products or general insurance products – other organisations to which personal information is usually disclosed are medical professionals, medical facilities, health authorities, assessors, underwriters, reinsurers and fraud detection agencies and other organisations involved in our normal business practices.

## **KEEPING YOUR PERSONAL INFORMATION ACCURATE AND UP-TO-DATE**

We aim to make sure that the personal information we collect, use or disclose is accurate, complete and up-to-date. We will take reasonable steps to make sure this is the case. This way we can provide you with better service.

If you believe your personal information is not accurate, complete or up to date, please contact us.

#### **PROTECTING YOUR PERSONAL INFORMATION**

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse and loss and unauthorised access, modification or disclosure. Some of the ways we do this are:

- Confidentiality requirements for our employees.
- Document storage security policies.
- Security measures for systems access.
- Providing a discreet environment for confidential and security discussions.
- Only allowing access to personal information where the individual seeking access has satisfied our identification requirements
- Access control for our buildings.
- The security measures described below under the TradeEpay website.

### **Your Privacy on the Internet**

#### **OUR WEBSITE**

We take care to ensure that the personal information you give us on our websites is protected. For example, our websites have electronic security systems in place, including the use of firewalls and data encryption, user identifiers, passwords and other access codes may also be used to control access to your personal information. Please refer to the TradeEpay website with which you transact electronically for more information on our website specific privacy and security procedures.

#### **LINKS TO OTHER SITES**

You may be able to access external websites by clicking on links we have provided. Those other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.

#### **GAINING ACCESS TO YOUR PERSONAL INFORMATION**

You can gain access to your personal information or ask us to correct any information we hold about you which you do not believe is correct. This is subject to some exceptions allowed by law. Factors affecting a right to access include:

- Access would pose a serious threat to the life or health of any individual.
- Access would have an unreasonable impact on the privacy of others.
- A frivolous or vexatious request.
- The information relates to a commercially sensitive decision making process.
- Access would be unlawful.
- Access would prejudice enforcement activities relating to criminal activities and other breaches of law, public revenue, a security function or negotiations with you.
- Legal dispute resolution proceedings.
- Denying access is required or authorised by or under law.

We will give you reasons if we deny access or decline to make any corrections which you request.

Contact us to get a form requesting access (see Contact Us). In some cases we may be able to deal with your request over the telephone.

#### **USING GOVERNMENT IDENTIFIERS**

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

#### **TRANSFER OF INFORMATION OVERSEAS**

TradeEpay does not currently transfer any personal information to countries outside of Australia. If this changes, we will notify you by updating this policy.

#### **RESOLVING YOUR PRIVACY ISSUES**

If you have any issues you wish to raise with TradeEpay, or would like to discuss any concerns about our Privacy Policy, then you are able to do so a number of ways:

- You are always welcome to speak directly to our staff and they will do their best to resolve your issue. If investigation is required we will keep you advised of progress. If our staff are unable to resolve the matter, it will be escalated as appropriate to facilitate resolution.
- You can email us via the Contact Us page.
- We take your privacy seriously, and will endeavour to resolve your concerns as quickly as possible.