



# **Paytime Privacy Policy**

This privacy policy ('the Privacy Policy') applies to Paytime Holdings Pty Ltd ACN 643 703 879, and its affiliates and related companies, (together, 'Paytime', 'we', 'us' or 'our'), and details how we collect, manage and use Personal Information, including but not limited to Personal Information collected on our websites, mobile applications, via email, cloud-based services, or controlled widgets embedded in communication platforms with a link to this Privacy Policy ("Websites"). By "Personal Information" we mean information that is associated with a specific person and can be used to reasonably identify that person. Personal information does not include information that has been made anonymous, and cannot reasonably identify a specific person. It covers how we collect, use, and share that Personal Information as of the date that this Privacy Policy is posted. Paytime is committed to respecting the privacy of your Personal Information. We appreciate that individuals are concerned about the security of their Personal Information and we are committed to protecting any Personal Information in our custody or control. Paytime is subject to the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). Paytime's third party suppliers and commercial partners (together, 'our Partners') are independent of Paytime and may have privacy policies which differ from ours. Our Partners are responsible for their own privacy policies and privacy practices. Please contact our Partners directly for further information on their privacy policies.

The Website may also contain links to third party websites. These linked sites are not under our control and we are not responsible for content on these sites, nor are these sites subject to this Privacy Policy. Before disclosing your personal information on any third-party website we recommend that you examine the terms and conditions and privacy policy of that site. This Privacy Policy applies when you sign up for, access, or use our services, features, technologies, functions or purchase goods and services offered on our Website (collectively 'Paytime Services') and in relation to Personal Information we may otherwise collect during the course of our business as set out in this Privacy Policy. Paytime may amend the Privacy Policy at any time. The updated version will be available by following the 'Privacy' link on the Website. The revised version will be effective from the time we post it on the Website. Paytime may highlight any material changes to the Privacy Policy that may impact you by notifying you by email or otherwise.





#### **Collecting Personal Information**

Paytime strives to be fair and open about the way we collect information about you and what we intend to do with the information. We receive and store certain types of information from you when you interact with our Websites to deliver the products you request from us, and help improve your overall online experience. For example, like many other websites, we store "cookies" and other web-based files on user devices to get certain types of information when your web browser, mobile phone, or other device accesses our Website. The information sent to us may include data on the pages you access, your computer IP address, device identifiers, the type of operating system you are using, your location, mobile network information, standard web log data and other information. Web log data includes the browser type you are using and traffic to and from our site. When you visit our Websites or use Paytime Services, we may also collect information about your transactions and your activities. Details on our collection of Personal Information through the use of cookies and analytical services is set out below.

In addition, when you utilise the Paytime Services, we may collect the following types of information:

- Contact information, such as your name, address (including your geolocation), phone number and email;
- employee records, including variations to your employment, terminations, leave requests,
- payroll/HRIS systems data;
- financial information, such as bank account numbers that you link to your Paytime account or give us when you use Paytime Services.
  Detailed Personal Information such as your date of birth, employment details or other identification information or documents.

We may also obtain information about you from third parties including our Partners and related companies, as well as credit reporting bodies and identity verification services, and publicly or commercially available sources for the purposes of complying with relevant legislation (eg. antimoney laundering laws).

You may choose to provide us with access to certain Personal Information stored by third parties such as social media sites (e.g. Facebook, Google and Twitter). The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your Paytime account and authorising Paytime to have access to this information, you agree that Paytime may collect, store and use this information in accordance with this Privacy Policy.

We may also collect your Personal Information if you enter a competition or promotion we run (either directly or through our marketing agents or our Partners), or if you apply for employment





with us either directly or through a recruitment or employment agency. We may collect Personal Information about our Partners' staff directly from those staff or from our Partners. The information we collect about our Partners' staff may include your name, position, contact details etc. We may also collect the Personal Information of our suppliers and service providers' staff during the course of our business activities. This information may include your name, contact details and position. We will collect this information directly from you, or from the applicable supplier or service provider.

We may also collect and handle sensitive personal information about you, to deliver our products or services. We will only collect this information where it is reasonably necessary and we have your consent, or where it is required by law.

In order to help protect you from fraud and misuse of your Personal Information, we may collect information about your use and interaction with our Websites or Paytime Services. For example, we may evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

We may also collect additional information from or about you in other ways, such as through contact with our customer support team, suppliers or service providers (whether via mail, email or through telephone enquiries), your responses to a market survey, and from interactions with Paytime's Partners or as otherwise notified to you at the time.

## **Using Personal Information**

Paytime only collects, holds and handles information about you that is necessary for us to perform the services you request from us, that is otherwise reasonably necessary for our business activities or if required by law, court, or tribunal order.

We may use Personal Information we collect about you for a number of purposes including:

- provide (or assess whether to provide) Paytime Services;
- processing transactions for the delivery of third party goods or services available through our Websites;
- customer support;
- process transactions and send notices about your transactions;
- resolve disputes, collect fees, and troubleshoot problems;
- investigate and prevent potentially prohibited or illegal activities;
- learn more about your level of satisfaction, your expectations of us and our Partners, and how we can meet them (for example, in relation to Paytime Services, and the goods offered by Paytime's retailers);



- customise, measure, and improve Paytime Services and the content, layout, and operation of our Websites;
- deliver targeted marketing, service update notices, and promotional offers based on your communication preferences;
- contact you via telephone, text (SMS), email messaging, or other forms of electronic communications, including as authorised by our Terms and Conditions;
- compare information for accuracy and verify it with third parties;
- confirm your identity for the purposes of anti-money laundering and counter-terrorism laws and assess applications and your suitability for Paytime Services;
- to consider you for a position at Paytime for which you have applied;
- to acquire goods or services from you or from your employer;
- for the purpose of performing data analytics including to improve our and our Partners' services;
- for other purposes to which you have consented; and
- as required or permitted by relevant laws and regulations.

You agree that we may use your Personal Information for the purposes for which we collect it and for related purposes which would be reasonably expected by you. If all or some of your Personal Information is not collected or cannot be verified, we may be unable to provide you with Paytime Services or a customised experience, engage with you, or do business with you.

We do not disclose any Personal Information to any overseas recipient.

## **Data Retention & Account Deletion**

We only retain collected personal information for a limited period of time for as long as we need it to fulfil the purposes for which we have initially collected it, unless otherwise required by law.

We will take all reasonable steps as quickly as reasonably possible to destroy or de-identify the personal information we hold once the personal information is no longer needed for the purpose for which the personal information may be used or disclosed.

We will take all reasonable steps as quickly as reasonably possible to destroy or de-identify the personal information we hold about the individual if/when he/she requests for the information to be destroyed or deleted. A user may request deletion of all their data, but certain transaction information must be retained for legal purposes as maybe required by law.

If you would like to inquire as to what, if any, of your personal information we have or what personal information you have submitted to us, please contact us at support@paytime.com.au. In





your request, please note you are writing about "personal information" in the subject or body of the email.

## How we share Personal Information with other parties

We may share your Personal Information with:

- Our affiliates and related companies;
- Our Partners and the suppliers and service providers who help with our business operations including in relation to fraud prevention, identity verification, payment collection, marketing, customer service, and technology services;
- Your Employer and third party suppliers, so that they can provide goods or services to you (or the recipient of third party goods or services) or respond to a complaint by you, or to help them improve the quality and standard of service they provide to you;
- financial institutions that we may partner with to jointly create and offer a product;
- companies that we plan to merge with or be acquired by or who may invest in us;
- law enforcement, government agencies or officials, or other third parties pursuant to a subpoena, court order, or other legal process or requirement applicable to Paytime;
- when we need to do so to comply with law or credit card rules; or
- when we believe, in our sole discretion, that the disclosure of Personal Information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate suspected violations of our User Agreement; and
- Other third parties with your consent or direction to do so.

Please note that these third parties may be in other countries where the laws on processing Personal Information may be less stringent than in your jurisdiction. When we disclose your Personal Information overseas, we will take all reasonable measures to ensure that your information is held, managed and accessed in accordance with appropriate standards for the handling of Personal Information.

In addition, you should note that third party suppliers that you contract with (even if such services are purchased using Paytime Services) have their own privacy policies, and Paytime is not responsible for their actions, including their information protection practices. We will only share your Personal Information with third parties as described in this Privacy Policy or as otherwise notified to you at the time of collection or with your consent.





## **Protecting and Securing Your Personal Information**

Paytime will keep your Personal Information secure by taking reasonable steps to protect it from misuse, loss, and unauthorised access, use, modification, and disclosure. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration.

We also review our security procedures periodically to consider appropriate new technology and updated methods. Only properly authorised people who have a need to access Personal Information to perform their job will be able to see or use that information. Even so, despite our reasonable efforts, no security measure is ever perfect or impenetrable.

Your personal data is held in securely encrypted databases at Amazon AWS Data Center in Sydney, NSW Australia. You can review the full security controls and measures that are applied <u>here</u>.

## Accessing and requesting correction of Personal Information

We will strive to ensure that information about you is accurate when we collect or use it. Subject to some exceptions under privacy law, we will let you see the information we hold about you and correct it if it is inaccurate, incomplete or out-of-date. If we do not grant you access to your Personal Information or do not agree to correct your Personal Information we will tell you why.

If you wish to obtain access to and/or correct your Personal Information held by Paytime, please contact Paytime on: Email: info@Paytime.com.au Phone (Australia): 1300 80 49 60

Unless we do not agree to your request for access to Personal Information, in most cases Paytime will provide you with access as soon as reasonably possible following receipt of your request. If you request corrections to your Personal Information and Paytime agrees with your request, these changes will be made as soon as practicable. If Paytime does not agree to your request for correction, it will notify you of the reasons it does not agree and will note your request on the records it holds about you. If you are dissatisfied with our refusal to provide you with access to, or correct, your Personal Information you may also complain to the applicable regulator in your jurisdiction.

Please also refer to our <u>Terms and Conditions</u> for more information.





#### Consent

We may require your consent to use and/or disclose your Personal Information if we need to use your information for a purpose that is not related to the purpose for which it was collected. If you do not consent to Paytime collecting, using and/or disclosing your Personal Information for such other purposes, this may affect Paytime's ability to deliver and improve our products and services, or to engage or do business with you.

When you provide us with or we access, via your payroll data, your name, date of birth, phone number and residential address in establishing your profile with us, you consent to us disclosing that information to credit reporting bodies and requesting an assessment of whether it matches personal information held by the body to assist in verifying your identity under anti-money laundering laws, should it be required, by law. The body may provide us with that assessment and use your personal information, and the names, residential addresses and dates of birth of other individuals, to prepare that assessment. Such information shall not be published anywhere, nor made public nor have an effect on your credit profile.

#### **Marketing and Privacy**

Paytime may send marketing materials from time to time to those who have provided Paytime with Personal Information about products and services offered by Paytime and our Partners. If you signed up to receive newsletters or other marketing communications from us, you can optout any time by clicking the unsubscribe link at the bottom of the message. You can also where possible, log-in to your account to opt-out and update your marketing preferences at any time.

Even after you opt-out or update your marketing preferences, please allow us sufficient time to process your marketing preferences. Unless otherwise required to process your requests earlier by law, it may take up to 5 days to process your opt out requests in relation to receipt of electronic marketing materials such as emails and SMS, and up to 30 days for all other marketing-related requests.

Even after you've opt-out of receiving marketing communications from us, we may still contact you for transactional or informational purposes. These include, for example, customer service issues, payment or access inquiries, surveys or other.

You may also contact us on: Email: info@Paytime.com.au Phone (Australia): 1300 80 49 60 Mail: PO Box H317, Australia Square, NSW 1215





## **Controlling Our Tracking Tools**

Your browser may give you the ability to control cookies. How you do so, however, depends on your browser and the type of cookie. Certain browsers can be set to reject all browser cookies. If you configure your computer to block all cookies, you may disrupt certain web page features, and limit the functionality we can provide when you visit or use our Websites. If you block or delete cookies, not all of the tracking that we have described in this policy will stop. If you continue without changing your settings, we will assume that you are happy to receive all cookies on this Site. You can change your cookie settings at any time. Some browsers have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. These browser features are still not uniform, so we are not currently set up to respond to those signals.

## **Cookies and Third Party Analytical Services**

We may use cookies and track IP addresses via our Websites so we can improve our services provided by our Websites and enhance your user experience.

When you access our Websites or use Paytime Services, we (including our Partners and companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively 'Cookies'). We use Cookies to ascertain which web pages are visited and how often, to make our Websites more user friendly, to give you a better experience when you return to a website and to target advertising to you that we think you may be interested in.

For example, Cookies allow us to save your password so you do not have to re-enter it every time you visit our site.

Most web browsers automatically accept Cookies. You can find information specific to your browser under the "help" menu. You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our Websites and Paytime Services.

## **Controlling Online Interest-Based Ads**

We sometimes work with online advertising vendors to provide you with relevant and useful ads. This may include ads served on or through our Websites. This may also include ads served on other companies' websites. These ads may be based on information collected by us or third parties. For example, your postal code may be used to target an ad for people in your area.





These ads may also be based on your activities on our Websites or on third party websites, as well as other criteria like date of birth, etc.

Our Websites also use Google Analytics, a web analysis service of Google Inc. ('Google'). Google Analytics uses Cookies to monitor traffic to, and use of, the Websites. Google uses this information on our behalf to evaluate your Website usage, to compile reports on the Websites activities, and to provide additional services connected with the Websites. We will not identify you to Google, and will not merge personal and non-personal information collected through this service.

You can prevent the use of Google Analytics Cookies by adjusting the settings on your browser software, however, you may not be able to fully use all of the functions of the Websites if you do so. In addition to Google Analytics, we may also use other third-party analytics tools to monitor, analyse and collect information about your use of the Websites.

## **Resolving your concerns**

If you have a complaint regarding Paytime's management of your Personal Information, please prepare your complaint in writing and email it to us at info@Paytime.com.au Paytime will provide written acknowledgement of your complaint within 7 days of receipt. We will investigate and advise you of the steps we have taken to resolve your complaint within 30 days of receipt of your complaint.

If you consider your concerns have not been dealt with satisfactorily, we can arrange a meeting with you to discuss the matter further.

If you are not satisfied with our response to your complaint within 30 days from our meeting, you can refer your complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992, or using an online form which you can download <u>here</u>.

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