

Privacy Policy

Privacy Statement

UrPay Technologies Pty Ltd trading as Urpay (ACN 654 788 575), an Australian registered company ("UrPay", "we", "our", "us") consider your privacy to be important and we take our responsibility to protect it seriously. We understand that you are concerned about your privacy, along with the confidentiality and security of any personal information that you provide to us.

This privacy policy (**Policy**) sets out how we collect, hold, use and disclose information about individuals who deal or interact with us. We treat all personal information collected by us as required by law in accordance with the *Privacy Act 1988 (Cth)* (**Privacy Act**), the Australian Privacy Principles contained within the Privacy Act and this Policy. If there is any inconsistency between the Privacy Act and this Policy, the Privacy Act will prevail to the extent of the inconsistency.

Anonymity

Due to the nature of the services we provide it is generally impractical for us to deal with you without knowing your name and your contact details. However, where it is practical for us to do so, we shall provide you with the option to deal with us anonymously or by using a pseudonym.

Collecting personal information

Personal Information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. We store a range of Personal Information that is provided as a part of our business and through the use of our products and services. This information is collected from a wide variety of sources including:

- a. through our website www.urpay.com.au (the Site);
- b. through our UrPay Technology applications;
- c. from you conducting business or intending to conduct business with us, whether past, present or future;
- d. by otherwise having some form of contact with us such as such as by mail, telephone, email, internet or intranet, or use of our software application; and/or
- e. through any of our other business activities or events.

Personal Information collected by us may include:

- a. your name, gender or age;
- b. your contact details such as your mobile number, telephone number and email address;
- c. your credit card or banking information;
- d. your physical or residential address;
- e. all logs, which may include information such as your internet protocol (**IP**) address, browser type, browser version, clickstream data, referring URLs, the pages of our Site that you visit, the time spent on any pages of our Site or software application and other log related information relating to your use of our Site or software application.

We endeavour to only collect personal information about you where it is reasonably required.

Use of personal information

We automatically gather information to monitor the use of our Site, technology application, and provision of our services. Much of the data we collect is aggregated, and this information is effectively anonymous to us. In general we use Personal Information for providing, evaluating, improving, personalising and developing our business, our Site, technology applications and our services. More specifically we use Personal Information for:

- a. establishing and maintaining your relationship as a customer of UrPay;
- b. providing the products and services you have requested from UrPay;
- c. administering and managing the products and services provided to you;
- d. to answer your inquiries and provide you support;
- e. improving user satisfaction.
- f. promoting and marketing our services to you (each person may opt-out of marketing and sales communications);
- g. providing such information to third party providers of goods and services to enable them to provide services, including to market to you either through our technology application or directly;
- h. our internal research and statistical purposes (including market segmentation, market analysis, trend identification and customer value analysis); and
- i. enabling us to forward to you other information or material which we believe may be of interest to you (each person may opt-out of our information sharing communications).

Direct Marketing

As set out above, we may use your Personal Information for the purposes of directly marketing our products and services to you. We may also provide your information to third party providers of goods and services to enable them to market and advertise to you through our software application or otherwise directly.

By using the Site or our technology applications you consent to the collection and use of your personal information for direct marketing purposes.

If you do not wish to receive direct marketing communications from us, you can easily opt-out of receiving such communications by following the directions for unsubscribing in the communications that you have received from us.

Disclosure of personal information

Disclosure generally

We do not disclose your Personal Information to any third party without your consent, except where that third party requires the information to assist us in an advisory, technical, marketing or services sense. Any information shared will be imparted under strict obligations of confidence.

Aside from the above, we will only disclose Personal Information as legally required – either upon valid court order, as required under the Privacy Act, or where compelled by a law enforcement or governmental agency.

Protecting your personal information

Steps we take

We take reasonable steps to protect Personal Information we hold from:

- a. misuse, interference, and loss; and
- b. unauthorised access, modification, or disclosure.

The precautionary steps we take to protect Personal Information include:

- a. adopting measures to protect our computer systems and networks for storing, processing and transmitting Personal Information;
- b. adoption of procedural and personnel measures for limiting access to Personal Information by our staff or third-party suppliers to us;
- c. reviewing our information collection, storage and processing practices; and
- d. such other security measures we consider reasonable and appropriate from time to time.

Notwithstanding that we use our best endeavours to protect all Personal Information we collect and hold, please be aware that we unfortunately cannot guarantee its complete security and will not be

responsible where it is obtained by illegal third party actions.

Deleting your personal information

When personal information is no longer required to be kept by us, we will take reasonable steps to destroy or delete the Personal Information in a confidential manner.

Cookies

Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive.

We use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some features of our products and services.

Web beacons

Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users or to access cookies.

Unlike cookies which are stored on the user's computer hard drive, web beacons are embedded invisibly on web pages (or in e-mail). Web beacons may be used to deliver or communicate with cookies, to count users who have visited certain pages and to understand usage patterns.

Like many sites, we use web beacons to collect information which is done in accordance with this policy.

Overseas disclosure

No overseas disclosure

We store all personal information that we collect on servers located in Australia and do not disclose this information overseas, unless otherwise specified in this Policy.

Disclosure for analytics

We may use Google Analytics to track your usage of our website. Google Analytics is a web analysis service provided by Google. Google utilises the data collected to track and examine the use of the website, to prepare reports on the site's activities and share them with other Google services.

Google may use the data collected to contextualise and personalise the ads of its own advertising network. Personal data collected by Google includes cookie and usage data, which is processed in the USA. You can find Google's privacy policy here:

<https://www.google.com.au/policies/privacy/>.

Consent to overseas disclosure

Other than as contemplated in this clause, we will only disclose your personal information to an overseas recipient if:

- a. you consent to the transfer; or
- b. the disclosure of the information is required or authorised by or under an Australian law, other applicable law or a court/tribunal order.

We will take reasonable steps to ensure such overseas recipients do not breach the Australian Privacy Principles (APP's) or are subject to laws or a scheme substantially similar to the APP's.

Third parties

Our Site, software application, products and the services we provide may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third party sites, products or services whatsoever.

You should be aware that your ability to opt-out of a third party tool or platform will depend on the conditions governing your agreement with that third party.

Accessing and updating your personal information

Access to Personal Information

We will provide you with access to your Personal Information held by us unless:

- a. giving access would be unlawful; or
- b. denying access is required under the Privacy Act or any other applicable law in our reasonable opinion.

Request for Access

If you would like access to your personal information aside from your account information, you must contact us in writing making such a request. You may contact us via email at support@urpay.com.au.

Following receipt of your request, we will contact you and either provide you with the information you have sought, or return to you with an explanation detailing why we will not provide you with the information.

Amending your personal information

If you wish to amend personal information that we hold, please contact us to request the amendment. You may contact us via email at support@urpay.com.au. If we elect not to correct your information, we will notify you, within a reasonable time, of the reason for our refusal, the mechanisms available for you to complain about our refusal and such other matters required by the Privacy Act.

If you wish to have your personal information deleted, please let us know and we will take all reasonable steps to delete it, unless we need to keep it for legal reasons.

International users

If you are located outside of Australia and choose to provide your personal information to us, your personal information will be transferred to Australia and processed in accordance with this Policy. •

Data breaches

If we suspect that a data breach has occurred, we will undertake an assessment into the circumstances of the suspected breach within 30 days after the suspected breach has occurred. Where it is ascertained that a breach has actually occurred and where required by law, we will notify the Privacy Commissioner and affected customers as soon as practicable after becoming aware that a data breach has occurred. •

Complaints

We strive to ensure our compliance with this Policy and to regularly review our practices against it.

If at any time you have a complaint against us regarding our Policy, including a breach of the Privacy Act, we invite you to make a complaint at support@urpay.com.au. All complaints made will be dealt with in confidence. We endeavour to respond within 30 days of receipt of a complaint with a resolution or proposed resolution to the issue raised.

Please note that you may also make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of your personal information. Information on making a privacy complaint can be found on their website at <https://www.oaic.gov.au/privacy/privacy-complaints/>

Variations

We reserve the right to vary this Policy from time to time. Any variations made will be updated on our website. It is your responsibility to check our Policy periodically to ensure you are aware of any changes made to it.

Further information

For any further information about this Policy please contact us.