



# EU Privacy Policy

Last updated: 18th August, 2021

## European Union Privacy

### 1. Your Rights

This policy addendum is made on behalf of Paytron Holdings Pty Ltd ABN 26 645 735 155 ("Paytron"). All references to "Paytron", "we", "us" or "our" in this policy are references to Paytron Holdings Pty Ltd and its subsidiaries.

In addition to the principles detailed in the Paytron Privacy Policy ('the policy'), Paytron is committed to protecting your privacy under legislation and best practice requirements across all jurisdictions in which it operates.

In offering its services to EU based individuals, Paytron complies with, amongst other legislation, the General Data Protection Regulation ('GDPR') (EU Regulation 2016/679).

This addendum sets out the specific requirements for the processing of personal information under the GDPR requirements. Where no specific differences are detailed, 'the policy' provides the default approach and overriding principles. The addendum is designed to inform customers in relation to the following principal rights:

- Right of Access: the right to be informed of and request access to the personal data we process about you,
- Right to Rectification: the right to request that we amend or update your personal data where it is inaccurate or incomplete,
- Right to Erasure: the right to request that we delete your personal data,
- Right to Restrict: the right to request that we temporarily or permanently stop processing all or some of your personal data,
- Right to Object:
  - the right, at any time, to object to us processing your personal data on grounds relating to your circumstances, the right to object to your personal data being processed for direct marketing purposes,
- Right to Data Portability: the right to request a copy of your personal data in electronic format and the right to transmit that personal data for use in another party's service, and
- Right not to be subject to Automated Decision-making: the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

The Addendum further informs EU based individuals of:

- What information we collect and the purposes for which we collect it;
- Use and disclosure of information collected;
- Security of your personal information;
- Gaining access to information we hold about you;
- What to do if you believe information we hold about you is inaccurate;
- Complaints in relation to privacy; and
- How to contact us.

### 2. Personal Information

As mentioned in 'the policy', information generally collected by Paytron includes (but is not limited to) the following (depending on the nature of the service provided):

- Your name, address, email and other contact details;
- Relevant financial information;
- Transaction purpose;
- Identification and verification information;
- Tax file numbers
- Bank account information

This information is collected solely from you and will not be obtained from third-party sources.

### 3. Communicating

Paytron will not communicate your personal data to third parties, except in the following limited circumstances:

1. Communication by Paytron to any third party that is involved in the processing of your transaction, including its suppliers, subcontractors or other parties with whom Paytron has a contractual relationship and that provide services for / assistance to Paytron in the framework of:
  - (a) the performance of the agreement between you and Paytron, and/or
  - (b) fraud prevention or the prevention of criminal acts.
2. To comply with its legal obligations, namely if Paytron is required by law to communicate certain information or documents to national regulators, law enforcement authorities or any judicial authority in the countries and territories in which it operates. Communication of personal data to those entities will be limited to the extent necessary or required under the applicable regulations.

Paytron will not communicate your personal data to any organisation without your consent and where it is not used for the purposes specified. Paytron will also not provide you with direct marketing without your explicit consent and will not provide your personal data to any other direct marketing organisation.

### 4. Retention

Paytron will keep your personal data only as long as necessary to provide you with legitimate and essential business purposes or for complying with our legal obligations and resolving disputes.

If you request, we will delete or de-identify your personal data, unless we are legally required to maintain it, in which case we will let you know.

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### 5. Transfer to other countries

Paytron may transfer your data outside of the EU and Switzerland to group companies, to provide you with effective services and support our contractual obligations to you. Paytron's platform uses best in class encryption algorithms and protocols to secure your data, as well as strong multi-layered password protection.

To maintain continuity of service and effective contingency, Paytron data is hosted in multiple overseas locations managed by Amazon Web Services (AWS). AWS is also compliant with our requirements under the GDPR regulations. It is policy for Paytron to ensure that all existing or prospective partners, that may host personal data, are similarly compliant.

Paytron is committed to protecting personal data. We implement appropriate technical and organisational measures to help protect the security of your personal data; however, please note that no system is ever completely secure. We have implemented various policies including pseudonymisation, encryption, access, and retention policies to guard against unauthorised access and unnecessary retention of personal data in our systems.

Your password protects your user profile and we encourage you to use a unique and strong password, limit access to your computer and browser, and log out after having used the Paytron platform.

### 6. Children's Data

Paytron does not knowingly collect from children under 16 years. If you are under 16 years of age, please do not use Paytron and do not provide any personal data to us.

If you are a parent or guardian of a child under 16 years of age and become aware that your child has provided personal data to Paytron, please contact us through the support contact details in this addendum.

If we learn that we have collected the personal data of a child under the age of 16 years, we will take reasonable steps to delete the personal data.

### 7. Access to your Personal Data

You are entitled to access your data. If you would like to do so, please contact:

Paytron  
Level 4, 11 York Street  
Sydney  
NSW, 2000  
Australia  
Email: [riskcompliance@paytron.com.au](mailto:riskcompliance@paytron.com.au)

Principal contact: Chief Risk Officer  
[www.paytron.com.au](http://www.paytron.com.au)

### 8. Privacy Complaints

If you have a complaint relating to our compliance with privacy laws or our treatment of your personal information, please contact us at the above address or email.

We will investigate your complaint and endeavour to resolve the issue to your satisfaction. If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

If you are located in Australia, where you have made a privacy-related complaint, we will respond to your complaint by no later than 45 days after receipt. If you are not satisfied with our response to your complaint or your concerns are not satisfactorily resolved, you may contact the Australian Financial Complaints Authority:

Australian Financial Complaints Authority  
GPO Box 3  
Melbourne  
VIC 3001  
Tel: 1800 337 444  
Fax: +61 3 9613 6399  
Website: [www.afca.org.au](http://www.afca.org.au)  
Email: [info@afca.org.au](mailto:info@afca.org.au)

Should your dispute with the Australian Financial Complaints Authority fail to reach a satisfactory outcome, you may wish to contact the Office of the Australian Information Commissioner on 1300 363 992 or by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

### 9. Changes to this Notice

This addendum will be reviewed annually or as required under changes to the GDPR regulation.