



solutions

# Privacy Policies

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## Version History

#	Date	Description	Who
0.1	08.08.22	Initial Draft	AS
0.2	10.08.22	Team Review	AS/SP/JH
1.0	17.08.22	Final Release	AS/SP

## 1. Purpose of this policy

This privacy policy aims to provide information about the personal information Digipayment Technology Pty Ltd collects, how that information will be handled, and how we provide access to personal information per the Privacy Act 1988 and other applicable laws and codes.

Digipayment Technology Pty Ltd complies with the Privacy Act 1988, which contains provisions designed to safeguard personal information about their customers. The Privacy Act 1988 requires us to comply with privacy principles set out in that Act. Personal information is any information that we use to identify a living person. This may include names, addresses, date of birth, gender, phone numbers or employment details.

Collecting your information is essential for us to service the relationship and the business operations. Without Personal Information, we would not be able to provide you with the products and services, enter into contracts or undertake transactions with you.

## 2. Information we collect

1. We collect and store all information electronically on Australian-based secured storage per our company's Information security policy<sup>[1]</sup> and take all reasonable steps to protect information from unauthorised access. Still, we cannot accept liability for unauthorised access or use of your personal information.
2. Information that you provide us in the course of using the Services and Products of Digipayment Technology Pty Ltd. We may also collect sensitive information from you, including your bank account number, credit or debit card number and date of birth;
3. To facilitate our Service or Product, we request certain third-party Personal Information from you, such as your Beneficiary or Recipient's full name, mailing address, email address, telephone number, date of birth, nationality etc. We may also collect from you sensitive financial information of a Beneficiary or a Recipient, including bank account numbers;
4. We lawfully obtain information from third parties, such as Service Companies, Document verification service providers, electronic database services, and credit reporting agencies;
5. We may collect the following types of personal information from you:
  - i. Full Name and Alias
  - ii. Address
  - iii. Date of Birth
  - iv. Occupation
  - v. Contact details (mobile number, email)
  - vi. Financial Information such as bank account name and number
6. Any other information we may collect with your approval, as permitted or required by law and in compliance with Australian Privacy Laws. If you are an entity, then, by applying for any services or Products of Digipayment Technology Pty Ltd, you agree and consent to the matters following. If you supply us with Personal Information about an individual, you agree to inform that person:

- i. We hold information about that person, and he or she can contact us at any of our offices.
  - ii. Personal Information collected about that person will be used for the primary purpose of accessing your application for the requested service and, if your application is approved, for the initial establishment of the service and then for the subsequent administration and eventual finalisation of your service and that without that Personal Information, this purpose cannot be fulfilled.
  - iii. Personal Information collected about that person will usually be disclosed to our business partners and us.
  - iv. That person has the right to access and correct Personal Information.
  - v.
7. Digipayment Technology Pty Ltd is committed to protecting the personal information of its Customers. We will never request you to disclose your personal information via unauthorised emails or SMS.

### 3. Use of your personal information

**Your Personal information is not used for any third-party marketing purposes or sold to any other entity. Digipayment Technology Pty Ltd collects, uses, holds and discloses your personal information for the following purposes:**

1. To process and complete your service request/s; our service staff and business partners are known as RRE (Regulated Remittance Entities)
2. To identify you and verify your identity from third parties, such as Service Companies, Document verification service providers, electronic database services, and credit reporting agencies;
3. Check your eligibility to use the services and products offered by Digipayment Technology Pty Ltd;
4. To collect payment for your use of the Service;
5. To reconcile the service payments
6. To troubleshoot problems with the service;
7. To allow our partners to fulfil their promotional obligations to you;
8. To monitor, review and improve the services of Digipayment Technology Pty Ltd;
9. To monitor compliance and comply with AML CTF Act 2006 and AML CTF Rules; and
10. To Prevent money laundering, terrorism financing, fraud and other illegal uses of the service.
11. Digipayment Technology Pty Ltd might use your personal information to
  - Train our staff in risk management and record keeping;
  - Maintain a good relationship with our customers; and
  - Comply with other legal regulations or as permitted by any laws.

## 4. Security and retention

Digipayment Technology Pty Ltd apply technical, physical, and administrative data security measures to protect your personal information from loss, misuse, unauthorised access, modification, alteration or disclosure. Once our dealing with you is completed, we endeavour to take reasonable steps to delete or permanently erase the personal information if not required further. We take all necessary steps to ensure we keep your information secure, for example, by:

1. Encrypting our services via a secure 256-bit SSL encryption and digital archiving;
2. Adequately trained staff on privacy matters and data protection;
3. The database server is only accessible to applications over a secure private network.
4. We maintain the servers at secure locations regularly tested by internal and external technical experts.
5. Digipayment Technology Pty Ltd is obliged to comply with the AML/CFT Act and the Privacy Laws; personal identity information is retained for seven years. Digipayment Technology Pty Ltd will destroy, erase, or make your personal information anonymous when it is no longer required per the Law.

## 5. Loss of personal information

Digipayment Technology Pty Ltd maintains adequate data security measures to protect information against unauthorised access and disclosure; despite our efforts, chances of breach of security cannot be completely ruled out. In the event of loss of personal information, Digipayment Technology Pty Ltd will:

1. Identify and prevent further breaches at the earliest instance possible.
2. Assess the nature and severity of the breach, including the type of personal information involved and the risk of harm to affected individuals.
3. Alert the affected individuals if required.
4. Engage appropriate authorities if criminal activity is suspected
5. Notify the Privacy Commissioner (at the OAIC) if the breach is significant

## 6. Complaints

If you have a complaint about our handling of personal information, we request you to contact us first. We will follow it with our Internal Dispute Resolution team and respond within 30 days wherever possible. If the matter proves to be complex, we may advise you to put the complaint in writing.

To complain, please contact us via our email:

We do our best to resolve the matter in a timely fashion. You will be advised in writing if we cannot resolve the matter promptly due to its complexity.

## 7. Office of Australian Information Commissioner (OAIC)

The Office of the Australian Information Commissioner (OAIC) can investigate privacy complaints from individuals about Australian and private sector organisations covered by the Privacy Act 1988 (Privacy Act). Before you can complain with the OAIC, you will generally need to complain directly to the agency or organisation you are complaining about and allow 30 days for it to respond. If you do not receive a response (after 30 days) or are dissatisfied with the answer, you may complain to the OAIC.

You can contact OAIC by visiting [www.oaic.gov.au](http://www.oaic.gov.au); email to [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au); calling 1300 363 992, If calling from outside Australia call: + 61 2 9284 9749, or write to OAIC, GPO Box 5218, Sydney, NSW – 2001 Or / OAIC, GPO Box 2999, Canberra, ACT- 2601

## 8. Changes

Please be aware that we may change this Privacy Policy in the future. The revised versions will be uploaded onto our website, so please check back from time to time.

## 9. Contact Us

If you have any questions or concerns about our privacy practices, please contact us by email.

Email: [contact@obsolutions.io](mailto:contact@obsolutions.io)