

eftpos Digital Identity Pty Ltd Privacy Policy

eftpos Group and related entities

The eftpos group ("eftpos Group") consists of the parent company, eftpos Payments Australia Limited (ABN 37 136 180 366) and its related entities, Digital Wallet Pty Ltd (ABN 93 624 272 475 AFSL 515270) (trading as "Beem It") and eftpos Digital Identity Pty Ltd (ABN 80 648 970 101) (offering the "connectID" solution).

The eftpos Group has policies, practices, procedures and systems controls designed to comply with the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles*. The eftpos Group privacy policy available www.eftposaustralia.com.au sets out how the eftpos Group collects, uses, keeps secure and discloses personal information collected by any means and by any technology, including through the "eftposaustralia" or "beemit" or "connectID" websites, except through use of the Beem It app or use of the connectID solution.

This Privacy Policy is issued on behalf of eftpos Digital Identity Pty Ltd (referred to in this policy as connectID) and applies to use of the connectID solution. References in this policy to "we", "us" and "our" are to connectID.

connectID is a 100% owned subsidiary of eftpos and is a digital identity broker or exchange service that makes it easy to share, store and receive your digital identity information online. connectID does not collect personal information (as defined in the Privacy Act) about the individuals whose digital identity information is transmitted using the service but does log digital identity sharing messages between users of the connectID digital identity solution.

However, what personal information we collect differs according to our interaction with you. This policy should be read in conjunction with the eftpos Group Privacy Policy (which applies to recruitment, employee and supplier information for general business purposes) and any privacy collection statement made available to you related to your interaction before, at or as soon as practicable after the time of collection of your personal information for specific interactions related to the connectID solution. The eftpos Group Privacy Policy and any privacy collection statement relevant to our specific interaction with you prevails to the extent of any inconsistency with this policy for recruitment, employee and supplier information.

What personal information do we collect

The personal information we collect differs according to our interaction with you. The categories of interaction and the types of personal information collected and held by us may include:

For business interactions:

- Contact information such as your name, company you work for, business address, business email address, business phone number (this could be a mobile phone number) and social media contact information which include LinkedIn business profile and Twitter handle. In the case of sole trader suppliers, we will also collect billing and bank account details. Refer to the eftpos Group Privacy Policy (available www.eftposaustralia.com.au) for how your business interaction information is handled, knowing that the personal information listed here is used for business purposes on terms governed by agreements with our suppliers.

Where possible, we will give you the option to deal with us anonymously. However, this may not always be possible, depending on the nature of your interaction with us. We will explain to you if information that identifies you is necessary for the relevant interaction. This will be done either directly or by us asking the person giving us information about you to pass on the details that allow you to access our privacy policy. If you choose not to provide certain personal information (e.g. your billing and bank account details), we may not be able to provide you with the services you request.

Occasionally, we may collect personal information about other individuals from you (e.g. your colleague's contact details). If so, we rely on you to inform those individuals that you are providing their personal information to us and to advise them that they can view this policy via our website to see how we handle their information (refer to our contact details below).

For use of the connectID solution

connectID does not retain in a record the digital identity information that passes through the connectID broker solution. However, connectID does retain the metadata related to such information message exchanges for the purposes required under legislation applicable to digital identity services and to verify that an exchange of identity information has occurred. (Note: Metadata is data providing information about one or more aspects of data, such as basic information about data which can make tracking and working with specific data easier. An example includes the identity scopes, identity profile and attribute matching metadata and means of creation of the data. While this will include a description of the nature of the identity information exchanged IT DOES NOT INCLUDE THE IDENTITY DATA ITSELF and it is not possible to identify an individual based on the connectID exchange transaction logs alone). Users of the connectID digital identity broker service may use your personal information which is passed through the service for various purposes. Please refer to the websites of your authorised identity service provider (eg bank, utility provider, government entity etc) and authorised relying party (anyone you have authorised to seek access to your personal information from your identity service provider) for their privacy policies which will explain how they handle your personal information.

How we collect personal information

We collect personal information in a number of ways, including:

- directly from you (if it is reasonable and practicable to do so) for example, when you provide information by phone, in application forms or other agreements, or when you submit your personal details through our website (refer below for details on information collected through use of our websites) or, for business contact information, through the project management tool used by us in conjunction with our service providers;
- from third parties, in circumstances where it is unreasonable or impractical to collect the information directly from you, for example, from our connectID participants and from other entities that provide digital identity services;
- from publicly available sources of information, such as business social media services.

How we use your personal information

Your personal information may be used for any of the following (in addition to specific uses notified to you in a separate privacy collection statement provided at or about the time of collection):

- verification of your identity;
- providing you or, where you work for a participant entity, your employing entity, with documents and information relevant to your or your entity's participation in the connectID digital identity scheme;
- providing you with information about or delivery of our products or services or such services ancillary to or necessary for those products or services (including in accordance with marketing campaigns);
- providing you with information promoting our products and services if you choose to receive that information and for marketing campaigns, if you have expressly informed us of your desire to receive such information;
- administration of our business, business analysis or to meet any legal obligations imposed on us;
- statistical or other analysis or similar research purposes, whether or not for product development;

- maintenance and development of our business systems and infrastructure, including monitoring performance, testing and upgrading of these systems,

(each a Purpose).

If we receive personal information about you that we did not ask for, then we will take reasonable steps, in a reasonable time after receiving the information, to determine whether the information is required for any legitimate business purpose involving you and if not, to lawfully destroy the information.

Your privacy and personal information is important to us and we will do each of the following:

- undertake privacy impact assessments as we design any new or changed product or service or if there are any changes to the personal information we collect or the way we use it, to determine the impact of the *Privacy Act 1988 (C'th)* and the government's Trusted Digital Identity Framework on the product or service and design for compliance;
- take reasonable steps to ensure the personal information that we collect, use or disclose is accurate, complete and up-to-date and relevant to the use or disclosure;
- facilitate anonymity or pseudonymity where possible, unless it is impractical in the circumstances;
- take reasonable steps to protect your personal information from misuse, loss and unauthorised access, modification or disclosure. This includes physical and logical security measures such as premises, infrastructure and database access restrictions, de-identification of data where possible and encryption of data in transit and at rest;
- take reasonable steps to destroy or permanently de-identify personal information if we no longer need it for any legitimate business purpose.

When we disclose your information

We will disclose your information:

- where you have consented to that disclosure, including where you have authorised a third party to seek information about you for the provision by them of products and services to you;
- for a Purpose to our service providers, including:
 - website hosting in Australia in respect of "cookie" information;
 - internal business process database hosting and support services in Canada.

We have entered into agreements with each of these entities which require compliance with the *Privacy Act 1988 (C'th)* and include provisions designed to give your personal information at least the same level of protection as we provide;

- for a Purpose to:
 - eftpos payment system members (which are banks, independent acquirers and retailers and their aggregator service providers), as necessary, to enable us to provide any of our products or services to you or answer enquiries and administer governance activities related to our rules; and
 - participants in the digital identity broker solution for the purposes you have authorised them to seek or provide your personal information.

These entities are also bound by the *Privacy Act 1988 (C'th)* and have their own privacy policies, and will observe these when using your personal information;

- where we are required or authorised to do so by law, including in response to a lawful request by any government, regulatory body or enforcement agency;
- where it is necessary in order to investigate an unlawful activity;
- where it is necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety;
- from time to time, we may inform you that your information including personal information, has been shared between eftpos Group entities for the same primary purpose for which it was disclosed to the eftpos Group entity, primarily for day-to-day business and operational purposes, and we will seek your consent to any secondary purposes; and

- if required to entities involved in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets, or other corporate change requiring the transfer of assets, including during the course of any due diligence process, to the purchaser or surviving entity.

Trans-Border Data flow

It is possible that the overseas entities which we share your personal information with may not be subject to foreign laws that provide the same level of protection of information as in Australia or may not be subject to any privacy obligations. Overseas entities may be required or compelled to disclose your personal information to a third party such as an overseas authority. You may not be able to seek redress in the overseas jurisdiction against the overseas entity. If we ask and you consent to us disclosing your personal information to an overseas entity and that overseas entity breaches the Australian Privacy Principles, we will not be accountable for that breach under the Privacy Act and you will not be able to seek redress in respect of that breach under the Privacy Act. Therefore, if we transfer or provide access to your personal information to a recipient outside Australia, we will conduct a privacy impact assessment to assess the gaps to meet the Australian Privacy Requirements and impose, and review compliance with, obligations on that recipient to comply with the *Privacy Act 1988 (C'th)* and include provisions designed to give at least the same level of protection for your personal information as we provide.

Information collected from any eftpos Group entity website

We collect information about the websites and the services, including the number of visitors, when the visits occur, how many pages are viewed and navigation patterns. We may also collect and store your Internet Protocol (IP) address. We get this information from 'cookies', which are a website tool commonly used to identify website users' computers. In these circumstances, it is impractical for us to collect the information directly from you. Knowing this information allows us to ensure that the information and services available through the website are relevant. We may use this information to obtain statistical information, which helps us evaluate and enhance the website. We may also send session numbers and keys as cookies to ensure that your connection, when using our online services, is kept as secure as possible.

It is the eftpos Group's policy not to sell or pass on any information recorded about your visit to the website for commercial purposes unrelated to any Purpose, unless we have your express consent.

If you decline to provide us with certain personal information when requested (for example, refusing cookies in your browser), the website may not operate optimally or at all.

We also use your IP address as metadata for your use of the connectID solution and to help diagnose problems with and to administer our website. No attempt is made to link any IP address with any individuals.

Where our website contains links to other sites, we are not responsible for the information handling practices or content of these external sites.

We also maintain several email lists to keep you informed about areas of specific interest. You may request to join our mailing lists by signing up through our website or by contacting us. You may also unsubscribe from any email list at any time.

Any personal information collected from emails to the whistleblower contact address on an eftpos Group entity website is used for purposes required by law in respect of those emails, the relevant eftpos Group entity published Whistleblower Policy and for statistical purposes.

We do not sell, rent, loan, trade, or lease any addresses or other information on our lists, or any other personal information that we may collect or hold, to anyone, unless you have provided express consent.

User express consent is required to be obtained by your identity service provider and authorised relying party to any exchange of digital identity information between those parties using the connectID solution.

Access to your personal information

You can request access to the personal information we hold in a record about you. Your request must be in writing and we will ask for proof of identity. We may charge a fee for the staff time and any expenses incurred to

respond to your request and provide the requested information to you. If it is not possible for us to provide you with access as requested, we will tell you why.

If you think that any personal information we hold about you is not accurate, complete and up-to-date, you may ask us to amend your details. We will take reasonable steps to amend your personal information as you direct, unless we reasonably consider that your information is already accurate, complete and up-to-date, in which case we will tell you why.

If you believe that we have failed to comply with this privacy policy, we encourage you to tell us how and to be as specific as possible so that we can resolve any misunderstanding or dispute between you and us. We will do our best to resolve your complaint as quickly as possible and will in any event respond within 5 days of receiving details from you.

If you are not satisfied with our response to your complaint, you can refer the matter to:

Director of Complaints,
Office of the Australian Information Commissioner,
Level 3, 175 Pitt Street, Sydney 2000
GPO Box 5218, Sydney NSW 2001.
Telephone: 1300 363 992
Facsimile: +61 2 9284 9666
Email: enquiries@oaic.gov.au

You can contact us by writing to us at Level 11, 45 Clarence St, Sydney NSW 2000 or by email at privacy@eftposaustralia.com.au or by contacting us at 0419 577 096 and asking for the Privacy Officer.

Approved by the Board of Directors of eftpos Digital Identity Pty Ltd on: [insert]