



RoyalPay

Privacy Policy

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1. About this policy

- 1.1 At Tunnel Show Pty Ltd (trading as **RoyalPay**), we understand the importance of each customer's privacy, and will put our best effort to protect your personal information. Your trust is of the upmost value to us, thus we want to make it clear about how we collect, process, disclose and exchange your personal information.
- 1.2 This Privacy Policy (**Policy**) is bound by the requirements and obligations stated in the *Privacy Act 1988 (the Privacy Act)* and Schedule 1 of the Privacy Act, which is also known as the Australian Privacy Principles (**APPs**). This Policy explains how we take appropriate measures to handle the personal information we collect.
- 1.3 This Policy applies to RoyalPay and all its related bodies corporate owned by Global R Financial Group Pty Ltd (together the **RoyalPay Group**), including:
- Global R Financial Group Pty Ltd
 - National Australia Payment Pty Ltd
 - Rpay Plus Pty Ltd
 - Rpay Services Pty Ltd
 - Rpay Pty Ltd (New Zealand)
 - Upay Pty Ltd
 - AZpay Pty Ltd
 - R Financial Holdings Group Pty Ltd
 - R Payment Pty Ltd
 - R Financial Service Pty Ltd
 - R Global Tech Pty Ltd

2. Scope of personal information being collected and held

2.1 In order to effectively service every customer and meet regulatory requirements, RoyalPay will collect a range of personal information from you. The personal information we collect and hold varies based on the different products and services we offer. Most personal information will be collected directly from you, while some personal information may be collected from third parties.

Personal Information

2.2 The personal information we may collect and hold includes, but is not limited to:

- personal identification information such as your full name, previous name, date of birth, gender, passport and driver licence number;
- contact details such as residential and postal addresses, telephone number, email address and social media handles;
- system information when you interact with RoyalPay, such as how you use your devices (mobile apps, internet) to complete transactions, cookies, and website statistics;
- location information such as your IP address; and
- other personal information, such as details of your interactions with us.

2.3 In addition, RoyalPay will have access to information of your transactions and account details or credit/debit card information. We will always keep the information private and secure, but may use the information to assist RoyalPay to further improve our products and services..

2.4 If we receive personal information about you that we do not request directly from you or from another party, we will decide whether that personal information falls within the types of personal information for which we've obtained consent from you and we could have collected the information in accordance with this Policy and applicable laws. If we decide that the personal information falls within one of these categories, we'll handle it in accordance with this Policy and applicable laws. If not, we will destroy or de-identify the information if it is lawful and reasonable to do so.

3. How personal information is collected

- 3.1 Personal information can be collected in many ways. We may collect your personal information when you are requested to complete a RoyalPay form, when you are giving us a call, or when you use our websites or mobile applications.
- 3.2 Under Anti-Money Laundering and Counter Terrorism Financing (**AML/CTF**) legislation, we are required to comply with 'know your customers' (**KYC**) obligations. This requires RoyalPay to ensure that its customers' personal information is correct.
- 3.3 RoyalPay may collect information about your IP address, location or activity, and may use electronic means, such as email or SMS, to communicate with you to verify your details, including identity verification using e-KYC methods.
- 3.4 RoyalPay will never ask you for your security details by email or SMS. If you are unsure, please contact us.
- 3.5 RoyalPay will usually collect personal information directly from you unless it is unreasonable or impracticable to do so.
- 3.6 RoyalPay may also collect personal information about you from other sources, including information that is publicly available or information made available by third parties, including:
- brokers;
 - service providers where we have information sharing agreements;
 - government agencies; and
 - other related entities of the RoyalPay Group.
- 3.7 We may also collect information from our websites and our apps. However, you will not be identified with the information we collect (that is, we will not be able to know the exact customer who holds the information). Any use or disclosure of the information will be in accordance with this Policy

4. Use and disclosure of personal information

4.1. RoyalPay may need to use or disclose your personal information in order to better provide you with our products and services. These may include:

- confirming your identity;
- providing you with information about products and services;
- processing your application, including determining your eligibility;
- responding to your requests and complaints, varying products and services, and managing our relevant product portfolios; and
- complete or achieve any other purpose for which you have given your consent.

4.2 We may also use or disclose your personal information for the purpose of:

- conducting marketing related activities;
- guiding internal practices and performing operational or administrative tasks, which includes, but not limited to, system development, risk management, staff training, and market analysis;
- overseeing customer activities to detect and take timely actions to prevent any misconduct, fraud or unlawful activities; and
- fulfilling regulatory, legal and tax-related obligations.

4.3 You will be able to opt-out if you no longer wish to receive direct marketing materials or offers from us by either changing your preference on our mobile application or directly contacting us. See section 11 for ways to contact us. Your request will be processed as soon as practicable.

4.4 Occasionally, we may need to share your personal information with others for the purposes as prescribed in section 4.1 and 4.2 or where the law otherwise allows. We may share information with other related entities of the RoyalPay Group for the purpose of improving our products and services to you.

4.5 We may also share your personal information with other third parties, including:

- service providers involved in providing, managing or administering your product or service;

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- authorised representatives of RoyalPay;
- credit reporting bodies or other approved third parties who are authorised to assess and verify the of your identification information;
- brokers or referrers who refer your application or business to us;
- other financial institutions, such as Authorised Deposit-taking Institutions;
- debt collection agencies;
- fraud reporting agencies;
- companies that are authorised to distribute RoyalPay's products or services;
- any party involved in securitising your facility, including the Reserve Bank of Australia (sometimes this information is de-identified), underwriters, trust managers, loan servicers, and security trustees;
- service providers that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems;
- payments systems organisations including merchants, payment organisations and organisations that produce cards and statements for us;
- our joint venture partners;
- mailing houses, media entities and telemarketing agencies who assist us in communicating with you, including social media channels;
- other organisations involved in our normal business practices, including our agents and contractors, as well as our accountants, auditors or lawyers and other external advisers (e.g. consultants and any independent customer advocates);
- government or regulatory bodies as required or authorised by law; and
- any other parties where you've given your consent or at your request.

4.6 We operate our business in Australia and New Zealand. We may need to share some of your personal information with organisations outside Australia. These countries include: New Zealand, China and the United States. If we do so, we make sure there are arrangements in place to protect your personal information.

5. Store your personal information

- 5.1 We may store your personal information in cloud or other types of networked or electronic systems. Service providers of these electronic or networked systems may be domiciled in other countries. In such cases, we will make sure there are arrangements in place with these providers to protect your personal information.
- 5.2 If your personal information is stored in this way, disclosures unintended by us may occur in countries which stores your personal information. For example, overseas organisations may be required to disclose information we share with them under a foreign law, in those instances, we will not be responsible for that disclosure.
- 5.3 We aim to keep your personal information only for as long as we need it. We take reasonable steps to destroy or permanently de-identify any personal information after we no longer need to hold or use it for any purpose under this Policy.

6. Access and correct your personal information

- 6.1 You will be able to access your personal information unless there are certain legal impediments preventing us from doing so. If we are unable to give you access, we will let you know in writing.
- 6.2 If you need to correct your personal information, you can usually do it through our mobile application, see section 11 for other ways to contact us. If you are not able to do so, or are concerned that the incorrect information may be held or used against you, you can contact us.

7. Security

- 7.1 The security of your personal information is very important to us. We encrypt certain information and follow generally accepted standards to protect the personal information submitted to us, both during transmission and after it is received.
- 7.2 Your account information is protected by a password. It is important that you protect against unauthorised access to your account and information by choosing your

password carefully and by keeping your password and computer or mobile devices secure, such as by signing out after using the services.

7.3 However, you need to be aware that no method of transmission over the internet or method of electronic storage is 100 per cent secure. Therefore, while we strive to protect your personal information, we cannot guarantee its absolute security.

7.4 We train our staff in how to keep your personal information safe and secure.

8. Withdrawing consent

8.1 You can choose to withdraw your consent for RoyalPay to collect and process your personal information at any time by contacting us or by changing the preference setting in our mobile application to enable you to withdraw consent. This process may take up to approximately five business days for the changes to take effect.

8.2 Depending on which of our products or services you have used, we may be required to retain certain information for legal, regulatory, tax, security, or compliance reasons for a limited period of time, after which it will be deleted.

8.3 If you choose not to authorise RoyalPay to collect your personal information, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service you have with us;
- personalise your experience with us;
- verify your identity and/or protect against fraudulent activities; or
- notify you about other products or services that might better meet your financial, e-commerce and lifestyle needs.

9. Making a complaint

9.1 If you have a complaint about how we handle your personal information, you are always welcome to contact us. We are committed to resolving your complaint and

doing the right thing by our customers. Most complaints are resolved quickly, and you should hear from us within five business days.

- 9.2 If we are not able to resolve your issue within five business days, we will let you know how long it will take.
- 9.3 If you still feel your issue has not been resolved to your satisfaction, you can escalate your privacy concern to either Australian Financial Complaints Authority (**AFCA**) or with the Office of the Australian Information Commissioner (**OAIC**). Contact details are as follows:

AFCA

website: www.afca.org.au;

email: info@afca.org.au;

telephone: 1800 931 678

OAIC

website: www.oaic.gov.au/privacy;

email: enquiries@oaic.gov.au;

telephone: 1300 363 992

10. Availability and Changes of this Policy

- 10.1 This Policy is available on our website at <<https://www.royalpay.com.au/>> where you can download a copy. You can also request a copy of this Policy to be provided for free or if you want to discuss your special needs, please see section 11 for ways to contact us.
- 10.2 We may make changes to this Policy from time to time. We will let you know of any changes to this Policy by posting a notification via our mobile application so you will be notified the next time when you open the application.
- 10.3 If you are being prompted to changes of this Policy, we recommend that you review the revised Policy so you understand the changes that may affect your rights and obligations.
- 10.4 You will be required to accept the changes before proceeding continuing use of our products and services.

11. Contact us

11.1 If you have any questions relating to the privacy of your personal information, you can contact us by:

- Using the 'Contact us' feature within our mobile application
- Sending an email to: compliance@royalpay.com.au
- Writing to us at: Level 11, 15 William St, Melbourne VIC
- Calling us on 1300 107 750