



# PRIVACY POLICY

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At MuliPay Pty Ltd and MuliPay Operations Pty Ltd (“MuliPay”, “we”, “us”, “our”) safeguarding your privacy is our top priority. Our Privacy Policy (“Policy”) aims to provide clarity on how we collect and utilise information, as well as the options available to you regarding your personal data. This Policy is applicable to all platforms under MuliPay’s operation, including websites such as [www.mulipay.com](http://www.mulipay.com) and [www.mulipay.com.au](http://www.mulipay.com.au) (“Sites”), as well as MuliPay’s suite of services, encompassing our web service and APIs, including as outlined in our [Terms and Conditions](#) (collectively, “Services”). We are committed to transparency and ensuring that your data remains secure and protected.

We collect information pertaining to you and your interactions with our platform, including when you request or use our products or services, register on our Sites, make a purchase, subscribe to our newsletter, participate in a survey, or fill out a form. Rest assured, any collection, storage, and utilisation of your personal data adhere strictly to the regulations outlined in the Australian Privacy Act 1988 (Cth) and, where applicable, the European Union General Data Protection Regulation (GDPR).

## **I. Information we collect**

Throughout your interactions with our Services or during any communication with us, we may collect various types of personal information about you, including

- Full name
- Contact details including phone number, email address, or address.
- Your age and/or date of birth
- Credit card, bank account, and/or financial details
- Tax file number
- Demographic information
- Your preferences and/or opinions
- Information you provided to us through feedback and/or customer surveys
- Details of products and services we have provided to you and/or that you have enquired about, along with our response to you
- Your support requests submitted to us and our response to you
- Information about browser sessions, geo-location, device and network details, page view and session statistics, acquisition sources, search queries, and browsing behaviour
- Details regarding your use of our site and services, including information collected through cookies, your interactions with our site, and the browser and operating system you use.
- Any additional personal information you provide directly or that we obtain indirectly through your use of our site, services, associated applications, affiliated platforms, and/or linked accounts.
- Any other personal information deemed necessary by us, whether requested directly from you or provided by a third party.

These categories of personal information may be collected directly from you or obtained from third-party sources. We handle this information with the utmost care, ensuring compliance with relevant privacy regulations and safeguarding your data privacy and security at all times.

You have the choice to provide information to us. However, please note that certain essential information is required to access and use our Services. If you do not agree to our collection, use, storage, or disclosure of your information in accordance with this Policy, you may not be able to utilise our Services.

## **II. How we use your information**

The information we collect may be utilised for various purposes, including but not limited to:

- Provision, maintenance, and operation of our Services
- Providing technical support and assistance
- Addressing and responding to your enquiries
- Enhancement of Services and the development of new features and Services
- Service-related communications, updates on new products or features, and soliciting feedback about our Services
- Sending marketing communications in accordance with local laws and your preferences
- Addressing enquiries from other financial institutions or service providers where involved in processing through our services
- Handling inquiries from our customers if you are an end user of one of our customers
- Conducting analysis, research, and generating reports regarding the use of our Services
- Safeguarding and securing our Services and our users
- Asserting, exercising, or defending our legal rights, including enforcing compliance with our terms of service and privacy policy
- Compliance with applicable laws, regulations, codes, subpoenas, governmental requests, or legal processes, including requirements under anti-money laundering, and counter-terrorism financial laws
- Prevention, detection, and investigation of any actual or suspected fraud, crime, or non-compliance with laws
- Fulfilling our legal obligations towards our payment infrastructure providers and licence holders
- Processing your information for additional purposes upon your consent

Rest assured, we handle your information responsibly and in compliance with relevant laws and regulations, prioritising the security and privacy of both our Services and our users.

## **III. When and with whom we share your information**

We may share your personal information with our internal team members, officers, insurers, professional advisors, agents, suppliers, or subcontractors as required for the purposes outlined in this Policy.

In certain circumstances, we may disclose your personal information to fulfil legal obligations, such as complying with laws, regulations, court orders, subpoenas, warrants, legal proceedings, or requests from law enforcement agencies.

In the event of a significant change in ownership of our business, where either all or a substantial part is transferred, your information may be transferred to the new owner. Throughout this transition, your information will continue to be bound by the assurances and commitments outlined in this Policy until such time as it is revised or amended by the new owner,

following notification to you. If additional mandatory restrictions apply under relevant laws during such transfers, we will adhere to these regulations accordingly.

#### **V. How we secure your personal information**

We implement multiple security measures to safeguard your information against loss, misuse, unauthorised access, disclosure, alteration, and destruction. Nevertheless, since no internet transmission method is entirely secure, we cannot assure the absolute security of your information.

When creating an account via our services, it is crucial to choose a robust password and refrain from sharing it with others. If you suspect any unauthorised activity on your account, please notify us promptly.

#### **V. How long we keep your personal information**

We retain your personal information for varying durations based on the objectives for its collection and utilisation, as described in this Policy. Once information ceases to be necessary for these objectives, we will either delete it or de-identify it, unless extending the retention period is necessary to adhere to relevant legal obligations.

#### **VI. Your right and choices**

Depending on your place of residence, you may have specific rights concerning your information, such as the right to rectify, modify, or delete it. If you wish to exercise your rights under applicable laws, kindly reach out to us via email at [privacy@mulipay.com](mailto:privacy@mulipay.com). Please include your name, the email address associated with your MuliPay account, and a brief description of your request. We may require further details to confirm your identity and will adhere to the response timelines mandated by the laws of your jurisdiction. Your patience is appreciated as we strive to address your inquiries and requests in a timely manner. We may not always be able to fulfil your request if we have a legitimate basis to refuse it. If we are unable to fulfil your request, we will inform you of the reason, as permitted by applicable law. For instance, we may deny a request to erase your personal data if it would prevent us from complying with our legal obligations.

#### **VII. International data transfers and hosting**

The information we gather may be stored, processed, or transferred between parties or sites situated in countries beyond Australia. These may encompass, but are not confined to, Australia, the United States, Philippines, and Indonesia.

We, along with other affiliated entities, maintains offices or facilities in Australia, the Philippines, and Indonesia. Transfers to these countries will be safeguarded by appropriate measures.

The hosting infrastructure for our website spans across Australia, the Philippines, and Indonesia. Transfers to these countries will be fortified by suitable safeguards.

Our suppliers and contractors are based in Australia, the Philippines, and Indonesia. Transfers to these countries will be shielded by appropriate safeguards.

### **VIII. Third-party sites**

Occasionally, our website may include links to external sites that are not owned or managed by us. These links are provided solely for your convenience. Please note that such links do not imply sponsorship, endorsement, or approval of these websites. It's important to recognise that we do not govern the privacy practices of these external websites. We encourage our users to exercise caution and review the privacy policies of each website they visit, particularly those that collect personally identifiable information, upon leaving our site.

### **IX. Children's privacy**

Our services cater to general audiences and are not targeted at children. If we discover that we have gathered data from children without legally valid parental consent, where such consent is necessary, we will promptly take appropriate measures to delete the data.

### **X. Cookies and web beacons**

At times, we may utilise cookies on our website. Cookies are small text files placed in your browser to store preferences. While cookies themselves do not reveal your email address or other personally identifiable information, they enable third parties like Google and Facebook to display our advertisements on your social media and online feeds through retargeting campaigns. When you opt to provide personal information on our website, it may be associated with the data stored in the cookie.

Additionally, we may employ web beacons on our website. These are small code snippets embedded in web pages to track visitor behaviour and gather information about their page views. For instance, web beacons can tally the number of users visiting a page or deliver a cookie to the browser of a visitor viewing that page. We may also utilise Google Analytics for data collection and processing.

### **XI. Privacy complaints**

Should you have any concerns regarding our privacy procedures, please don't hesitate to share the details of your complaint with us at [privacy@mulipay.com](mailto:privacy@mulipay.com). We prioritise the handling of complaints and commit to providing a prompt response upon receiving written notification of your concerns.

**XII. Updates to Privacy Policy**

Kindly note that our Privacy Policy may undergo revisions in the future. We reserve the right to modify this Policy at any time, exercising our discretion, and all changes will take effect immediately upon being posted on our website or notice board. We encourage you to periodically revisit our Privacy Policy to stay informed about any updates.

**XIII. Contact**

If you have any inquiries, concerns, or complaints regarding our Privacy Policy or our practices in handling information, please feel free to reach out to us:

Via email at [privacy@mulipay.com](mailto:privacy@mulipay.com)