

# SQID

## PRIVACY POLICY

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At SQID we are committed to ensuring that your personal information is protected. Our Privacy Policy details how we collect use and disclose your personal information so that you are confident that any of your personal information entrusted to us is treated with the appropriate degree of privacy.

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### Who is SQID?

- SQID is SQID Payments Pty Ltd – an Australian registered Company.
- Our ABN is 44 166 730 130
- We provide the ability for you to buy things simply by using your mobile phone for a variety of Merchants.
- We may also provide you information from time to time from our merchants/sellers. This comes as an SMS – or may come via Email

### What does "personal information" mean?

Personal information is any information that identifies you or by which your identity can be reasonably determined.

### Why we collect your personal information

The collection, use and disclosure of your personal information by SQID is essential to enable us to conduct our business of offering and providing our mobile phone payment capability.

By collecting your personal information we can generally administer our relationship with you which may include,

- establishing and administering products and services;
- determining your requirements and providing the appropriate product or service;
- knowing where to deliver purchases you have made;
- understanding things you like to buy so we can let you know of specials and discounts which are likely to be of interest to you;
- identifying you and protecting you from unauthorised access to your personal information, accounts or services;
- satisfying our legal obligations in respect to customer identification.

Without collecting and making use of your personal information, SQID and our Merchants may not be able to interact or do business with you.

## **How do we collect your personal information?**

Where possible we collect your personal information directly from you.

Collection may take place in a number of ways such as when you register with SQID or request a product or service over the telephone or Internet.

Often personal information is collected during the course of our relationship with you. Examples of personal information collection during our relationship may be when you advise us of a change in your contact details, make a purchase, pay a bill, make a donation or buy a discount voucher. Sometimes personal information may be collected about you from other sources. Examples of where we may receive personal information about you from another source and why this may happen are,

- publicly available sources of information such as telephone directories in the course of identification verification;
- market research organisations for the purpose of product development or marketing;
- social media where you give us permission.

In most cases we will require you to specifically acknowledge any collection, use or disclosure of your personal information by SQID. Your acknowledgment will usually be required in writing or by a specific act such as when you click an acknowledgment on our Internet sites however verbal acknowledgment may also be appropriate in certain circumstances.

Sometimes however your consent or acknowledgment may be implied through your conduct such as,

- when you continue a telephone call to our Call Centre after you have heard a recorded message that tells you that the call may be recorded;
- when you provide us with information that we have not specifically requested;
- when you provide us information via an automated computer generated call;
- when you provide us information via SMS, email or via our website.

However, no matter how your personal information is collected it is dealt with by SQID in accordance with this Privacy Policy.

## **How we use your personal information**

We use the personal information that we collect so that we can conduct our business of providing financial products and services and to administer and enhance the relationship we have with you.

## Direct marketing

From time to time we may use your personal information to provide you with information or offers containing savings and discounts that we deem will be of more interest to you.

***SQID does not disclose your personal information to a party outside SQID for the purposes of allowing that party to direct market its products or services to you.***

Often the law requires us to provide you with certain information about the product or service that you receive from us. You will continue to receive this type of information from us even if you have decided not to receive information about our products and services generally.

## Do we disclose your personal information to anyone?

SQID may disclose your personal information in certain circumstances.

Sometimes we are required or authorised by law to disclose your personal information. For example, we may disclose your personal information to a Court in response to a subpoena or to the Australian Taxation Office following a direction issued under taxation laws.

We may also disclose your personal information where you have consented to us doing so. Where you make a purchase using SQID that requires a delivery, we will disclose your name, mobile phone number and address to our merchant. Whenever we disclose information to a merchant it is similar to the information the merchant would otherwise get from you if you were to pay by other means. If for example, you were to pay for something over the counter by cash, the merchant would not have any information about you, only about what they sold you. If you were to make the same purchase by SQID, we would not give the merchant any information about you. If, however, you purchased something you saw on a TV advertisement by credit card, you would have to give the merchant your name, address and phone number so they can deliver the item to you. So too, if you made that purchase using SQID, we would give the merchant your name, address and mobile phone number. We will give out the same information about you to a merchant reasonably required for any other purchase mechanism. We will not however, give out your credit card, debit card or banking information to a merchant or any third party.

Your consent to the disclosure of your personal information may be given explicitly either in writing or verbally or it may be implied from your conduct such as when you discuss details of the relationship you have with us publicly with the media.

Generally however we do not disclose your personal information to a party outside SQID, unless that party is providing administrative or technical services or activities to SQID, or on its behalf, and that party is bound by the same privacy rules we follow.

If you are a merchant you have consented in your merchant application to SQID sharing limited transactional information for the purpose of fault finding and verification that the Transactional Platform for your merchant service is operational.

## Ensuring your personal information is up-to-date

SQID, the card issuing banks, the card schemes and our Merchant rely on the personal information we hold about you to efficiently administer our relationship and conduct our business of providing financial products and services.

For this reason, it is very important that the personal information we collect from or about you is accurate, complete and up-to-date.

During the course of our relationship with you we will ask you to tell us of any changes to your personal information however you can contact us at any time to update your personal information or to tell us that the information we hold about you is inaccurate or incomplete.

## **Is my personal information secure?**

The protection of your personal information is a priority for SQID.

This is why we take all reasonable precautions to safeguard your personal information from loss, misuse, unauthorised access, modification or disclosure.

We employ a number of means to protect your personal information including,

- external and internal premises security;
- restricted access to personal information;
- entering into confidentiality agreements with all employees, contractors and third party organisations that may have access to your personal information;
- having in place stand-by systems to deal with major business interruptions;
- maintaining technology products to prevent unauthorised computer access;
- regular reviewing and testing of our technology in order to improve the level of security;
- the use of technology to capture your PIN, secret answer and payment details.

Furthermore, when we no longer require your personal information it is our practice to securely destroy or delete the information from our systems.

SQID may be required by law to retain your personal information for a period of time after you have ceased your relationship with us. After the required time has passed we attend to the secure destruction or deletion of your personal information.

## **Can I access the personal information SQID holds about me?**

You may request access to any of the personal information we hold about you.

In most cases, a summary of personal information such as your name and address details, contact telephone numbers and the products and services you have with us is freely available for you to view by logging in to our website using your username and password or by calling SQID on +61 7 3393 9187.

For more detailed requests for access to personal information, for example, access to information held in archives, a fee may be charged to cover the cost of retrieval and the supply of this information to you.

All requests for access to personal information will be handled as quickly as possible and we shall endeavour to process any request for access within thirty (30) days of having received the request. Some requests for access may take longer than thirty (30) days to process depending upon the nature of the personal information being sought.

## **Can my request for access to my personal information be denied?**

SQID is not always required to provide you with access to your personal information upon your request.

We may refuse you access to personal information in a number of circumstances such as where the information may relate to existing or anticipated legal proceedings with you, where denying access is required or authorised by law, statute or industry standards, or where the request for access is regarded as frivolous or vexatious.

If we deny your request for access to, or refuse your request to correct your personal information, we will explain why.

## **What is a Commonwealth identifier?**

A Commonwealth identifier is a Commonwealth Government or Commonwealth Government agency designated identification number such as your Tax File Number (TFN) or Medicare number.

SQID does not use Commonwealth identifiers as a means of identifying the personal information that we may have collected about you.

We only use Commonwealth identifiers as a means by which you may prove your identity, for example when you are establishing a new account with us or for purposes required by law such as if we are required to supply your TFN to the Australian Taxation Office.

## **Do I have to be identified at all?**

It may not always be possible for us to do business with you unless we have identified you and in some cases, such as when you wish to open a new account with us, the law may require that you identify yourself to us.

Wherever it is lawful and practicable to do so, we may offer you the opportunity to deal with us anonymously. For example, when making an inquiry about SQID fees or the type of products or services we offer or when you are browsing our Internet sites.

## **Does my personal information leave Australia?**

SQID may send personal information outside Australia in circumstances that may include where,

- you have requested that we do so;
- we outsource an activity or function to an overseas contractor with whom we have a contractual arrangement;
- it is necessary in order to facilitate a transaction on your behalf.

SQID does not send personal information outside Australia unless it is authorised to do so by law.

## **EU Users**

We operate in and use service providers located in Australia. If you are located outside Australia, your Personal Data may be transferred to Australia. Australia does not provide the same legal protections guaranteed to Personal Data in the European Union. Accordingly, your Personal Data may be transferred to Australia in accordance with merchant and card processing guidelines outside of the EU. SQID Payments PTY LTD is committed to protecting the privacy of our EU users when we collect, process, and transfer Personal Data collected from EU citizens. Contact us if you require more information regarding protection of data subject to EU Law and scope within Australia.

## **Sensitive information**

If personal information concerns particular topics it is regarded as sensitive information. Sensitive information can be information about your,

- racial or ethnic origin
- political opinions
- membership of a political association
- religious beliefs or affiliations
- philosophical beliefs

- membership of a professional or trade association
- membership of a trade union
- sexual preferences or practices
- criminal record
- health

SQID only collects, uses or discloses sensitive information in circumstances that include where,

- we have received your consent to do so;
- it is necessary for our business purposes and is allowed by law;
- it is necessary for the establishment, exercise or defence of a legal claim.

## **Access to our services via the Internet**

We understand that you may have concerns about the personal information collected about you online or the security of your personal information that may be exchanged between us online.

### **Information collected about you online**

The only personal information SQID collects from you online, either via SQID's Internet sites or through e-mail transmission is your IP address and also personal information that you choose to submit to us in this manner.

SQID does not collect personal information from you online without your knowledge.

SQID's Internet sites rely on "cookies" to provide a number of services to you and for security reasons.

A cookie is a piece of data that an Internet site can send to your browser, which may then be stored on your computer. Cookies generally allow the Internet site you are browsing to interact more efficiently with your computer.

Usually you can set your browser to notify you before you receive a cookie so that you can decide whether to accept it however sometimes not accepting a cookie may affect your use of an Internet site.

If your computer does not accept SQID cookies, you may not be able to make full use of our Internet sites. For example, to use the SQID Login, your computer must accept SQID's cookies.

The cookies used by SQID are not used to track your browsing habits and SQID does not seek to identify any person browsing its Internet sites.

When you are browsing a SQID Internet site a cookie is placed onto your computer. This cookie does not collect any personal information about you, but it may collect information such as the type of operating system on your computer. SQID uses these cookies to collect statistical information such as how many visitors our Internet sites receive and how these users interact with the site. SQID gathers this information to maintain and improve upon the operation of our Internet sites.

If you logon to a SQID Internet site (for example, SQID Login), a different type of cookie is placed onto your computer that is necessary to identify you throughout your session. Once you have logged out, the cookie is no longer active.

## **Security of your personal information online**

SQID maintains technology and procedures no less than industry standard in respect to its information management and provision of online services. These measures are revised and updated to ensure we continually maintain and improve our level of security.

Transactions involving the submission of personal information over the Internet to SQID using one of our online forms via SQID's Internet sites use encryption technology to ensure the security of that personal information transmission.

Once received by SQID your personal information is stored and protected by a range of security controls including system firewalls and user identification requirements and audit trails. SQID's systems and information technology infrastructure are regularly audited by internal experts. Unless our e-mail transmission is made via SQID's "Secure Messages" or otherwise secured using encryption techniques, SQID does not transmit your personal information by e-mail externally unless you have consented to such transmission either expressly or impliedly through your interaction with us.

An example of where you may impliedly consent may be when you e-mail us your personal information and require a response using the same medium or when you raise no objection to our advised, intended communication with you or a third party in this manner.

## **Our Privacy Policy may change from time to time**

SQID constantly reviews all its policies and procedures to keep up to date with changes in the law, technology and market practice.

As a result we may change this privacy policy from time to time.

This Privacy Policy was last amended on 29 April 2018.

## **Concerns or requests for access?**

If you have a question about this Privacy Policy or wish to lodge a request to access your personal information you can contact us in any of the following ways,

- By visiting our website at <http://www.sqidpayments.com.au>.
- By telephoning +61 7 3393 9187
- By writing to SQID Payments Pty Ltd  
Privacy Information  
63 Westgate Street Wacol QLD 4076

## **Can I complain about a breach of my privacy?**

If you believe that SQID has not protected your personal information as set out in this privacy policy you may lodge a complaint with us in any of the following ways,

- By visiting our website at <http://www.sqidpayments.com.au>.
- By telephoning +61 7 3393 9187
- By writing to SQID Payments Pty Ltd  
Privacy Information  
63 Westgate Street Wacol QLD 4076

## **What if I am not satisfied with SQID's response?**

If you are not satisfied with the result of your complaint to SQID you can refer your complaint to the Federal Privacy Commissioner.

You can contact the Federal Privacy Commissioner,

- By telephoning 1300 363 992

By writing to Director of Complaints  
Office of the Federal Privacy Commissioner  
GPO Box 5218