



E M L
empowering your payments

Privacy Statement

Dated January 2016

Introduction

EML Payment Solutions Limited is committed to protecting your privacy. We maintain robust physical, electronic and procedural safeguards to protect personal information in our care. This Privacy Statement applies to the EML website, products and services and governs data collection and usage.

We are bound by the Privacy Act 1988 (Cth) ('Privacy Act') and will protect your personal information in accordance with the Australian Privacy Principles.

These principles govern how we collect, use, hold and disclose your personal information, as well as how we ensure the quality and security of your personal information.

What is personal information?

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. This may include your name, address, telephone number or email address.

How do we collect personal information?

EML is a payments processor of reloadable and non-reloadable prepaid card products and services in Australia.

EML main functions and activities it performs as a payments processor include:

- Card issuing, payment clearing and settlement;

- Platform Hosting and transaction processing;
- Application support and development;
- Program maintenance and reporting;
- Account management services;
- Cardholder and Card Program Sponsor customer service; and
- Fraud and transaction monitoring.

EML rarely has direct contact with the individual cardholder and we may need to collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from other organisations, who jointly with us, provide products or services to you.

The circumstances in which EML will collect personal information about you, as the cardholder, includes when:

- you contact us; or
- you register or apply for a Card; or
- you use a Card for transactions and balance enquiries.

What personal information do we collect?

EML collects and/or tracks the following types of personal information:

- The personal information you have provided us through our online card activation process including:
 - e-mail address;
 - name;
 - home or work address; and
 - telephone number.
- There is also information about your computer hardware and software that is automatically collected by EML. This information can include:
 - your IP address;
 - browser type;
 - domain names; and
 - access times.

- Information we receive from third parties including card program sponsors, credit bureaus and information services and aggregation businesses, regarding verification of identification details.

Throughout the life of your product or service, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaint you make.

For what purposes do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is to provide you with products and services.

This includes:

- checking whether you are eligible for the product or service;
- providing the product or service; and
- assisting you with your inquiries or concerns.

We may also collect, use and exchange your information so that we can:

- establish your identity;
- manage our risks and help identify and investigate illegal activity, such as fraud;
- contact you;
- comply with our legal obligations and assist government and law enforcement agencies or regulators;
- conduct research and training; or
- provide general statistics regarding use of the EML website.

EML encourages you to review the privacy statements of websites you choose to link to and from EML so that you can understand how those websites collect, use and share your information. EML is not responsible for the privacy statements or other content on websites outside of the EML website.

Is the information disclosed to third parties?

EML may disclose your personal information to third parties:

- who are service providers, contractors or card program sponsors of EML;
- to facilitate the operation of the card and the completion and settlement of transactions using the card;
- for anti-money laundering, counter-terrorism financing, detection of crime, legal compliance and fraud prevention purposes; and
- when required or allowed by law.

When your personal information is shared with service providers or contractors, it will only be to the extent reasonably necessary for the purpose of the services they are contracted to provide.

When your personal information is shared with program sponsors, it will only be to the extent reasonably necessary for the purpose of performing any necessary cardholder customer support, conducting statistical analysis, improving their product, services and practices.

EML may also disclose Personal Information to other third parties in circumstances where:

- We must fulfil our legal obligations (for example, disclosure to Australian (and international) enforcement bodies such as the Australian Securities and Investments Commission (ASIC), the Australian Taxation Office (ATO), the Australian Transaction Reports and Analysis Centre (AUSTRAC), Centrelink or the Courts);
- It is in the public interest (that is, to protect our interests or where we have a duty to the public to disclose, or where it is necessary in proceedings before a court or tribunal) and where a crime or fraud is committed or is suspected; or
- It can be reasonably inferred from the circumstances that the Cardholder has consented to their Personal Information being disclosed to a third party.

EML does not use or disclose the Personal Information for any other purpose unless one of the following applies:

- The individual has consented;
- The individual would reasonably expect EML to use or disclose the Personal Information for a purpose that is related to the primary purpose; or
- Use or disclosure is required under Australian law.

As a matter of course, EML does not disclose personal information to overseas recipients.

If this position changes, we will only send your personal information outside Australia where, for example:

- You have requested or consented that we send your Personal Information;
- We outsource a function or service to an overseas contractor with whom we have a contractual relationship; and
- It is necessary to investigate or facilitate a transaction on your behalf.

We will not send your personal information outside Australia unless it is authorised by law and we are satisfied that the recipient of the Personal Information has adequate data protection arrangements in place.

EML will continue to keep your personal information as is reasonably necessary, for the purposes mentioned above, after the expiry of the Card.

EML does not collect, use or disclose sensitive personal information, such as race, religion, or political affiliations.

Your consent is important

EML may require your consent to use and/or disclose your information in particular ways.

We need your consent if we use your information for a purpose that is not related to the purpose for which we collected your information in the first place.

Depending on the circumstances, this consent may be express (for example, you expressly agree to the specific use of your information by ticking a box) or implied by some action you take or do not take (for example your agreement is implied by the fact that you have agreed to your product terms and conditions which contains information about the use of disclosure).

Do we collect personal information electronically?

Each time you visit our website, we collect information about your use of the website, which may include the following:

- The date and time of visits;
- Which pages are viewed
- How users navigate through the site and interact with pages;
- Location information about users
- Information about the device used to visit our website; and
- IP addresses.

This information is obtained through the use of google analytics. The EML website does not use cookies or collect personal information or data.

Security of your Personal Information

EML protects your personal information from unauthorised access, misuse and disclosure.

Our security safeguards include:

Security Safeguard	Details
Physical Security	We have protection in our buildings against unauthorised access such as alarms, cameras and 24/7 monitored building access. We maintain physical security, such as locks and security systems over our paper and electronic data stores and premises
Staff education	We train and remind our staff of their obligation with regard to your information
System security	When you transact with us we encrypt data sent from your computer to our systems. Where appropriate, we have firewalls, password protection, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses accessing our systems. When personal information is transmitted to other websites, it is protected through the use of encryption, such as the Secure

	Socket Layer (SSL) protocol. We also limit access by requiring use of passwords.
Destroying data when no longer required	Where practical, we keep information only for as long as required (for example, to meet legal requirements or our internal needs).
Payment Card Industry (PCI) Data Security Standard (DSS)	<p>The PCI Data Security Standard represents a common set of industry tools and measurements to help ensure the safe handling of sensitive information.</p> <p>The standard provides an actionable framework for developing a robust account data security process – including preventing, detecting and reacting to security incidents.</p> <p>We have achieved the highest level of PCI DSS accreditation ensuring our customers are afforded the upmost protection and reliability of our implemented processes, systems and environment.</p>

Protecting your privacy

You can help us to protect your privacy by observing our security requirements and contacting us immediately if your contact details change.

We require you to keep your personal identification number (PIN), passwords and access codes confidential and secure at all times. This means that you should not disclose you PIN, passwords or access codes to any other person. You should contact EML immediately, if you believe that your PIN, passwords or access codes may have been disclosed to another person or if you would like to change your PIN or password.

Access to your personal information

You are entitled to ask us to supply you with any personal information that we hold about you. You must submit your request in writing to the appropriate address as below:

Privacy Officer
EML Payment Solutions Limited
Level 12, 333 Ann Street
Brisbane
QLD 4000

We maintain the quality of your personal information by taking reasonable steps to ensure that the information collected, used and disclosed is accurate, complete and up-to-date.

You may also update your personal information at any time by contacting EML on 1300 739 889 or emailing support@emlpayments.com.au.

How to make a complaint

EML welcomes your comments regarding this Privacy Statement. Should you wish to make a complaint about the way in which EML has handled your personal information or if you believe EML has breached the Australian Privacy Principles, please contact us at support@emlpayments.com.au or on 1300 739 889.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you're not satisfied with our handling of your matter, you can refer your complaint to external dispute resolution.

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner by calling them at 1300 363 992, online at www.oaic.com.au or writing to the Office of the Australian Information Commissioner, GPO Box 5218 Sydney NSW 2001.

Changes to this Statement

From time to time it may be necessary for EML to review and revise our privacy policy to reflect company and client feedback. EML encourages you to periodically review this website to be informed of how EML is protecting your information.



PBI Benefit Solutions Privacy Policy

This policy covers Smartgroup Corporation Ltd and its related bodies corporate ("Smartgroup", "we" or "us"). We understand how important it is to protect your personal information. This policy our commitment in respect of personal information we hold about you and what we do with that information. Our commitment is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act 1988 (Cth).

1. Collection of personal information

When we refer to *personal information*, we mean information about you from which your identity is reasonably identifiable. This may include information or an opinion about you whether true or not.

The kinds of personal information we may collect about you include:

- name;
- date of birth and age;
- address;
- contact details including telephone number, fax number and email address;
- bank account details;
- occupation, employment history and employment details, including financial information (including your payroll and employer details) and employee number; and
- Tax File Number;
- any other information we made need to identify you or to administer our services;
- if you are applying for a position with us, credit history, visa or citizenship status.

We may also collect the following information about you depending on the products and services provided:

- if you apply for finance or a lease – age and number of your dependants, how long you have lived at your current address, your employment details, proof of earnings and expenses, details of income, assets, liabilities, expenses, credit history and credit worthiness,
- if you apply for insurance, we may collect some information regarding your health (see below).

We may collect your *sensitive information* only to the extent it is necessary to administer our products or services to you, and only with your consent. Sensitive information includes membership of professional or trade associations or unions, or health information, or if you are applying for a position with us, your criminal history.

Where reasonable and practical we will collect your personal information directly from you. Depending on the product or service provided or your relationship with us, we may also collect your personal information from third parties, for

example, your employer or your employer's outgoing salary packaging service provider.

If you are applying to work for us, we may collect personal information through recruitment companies and websites and from other organisations and referees with your consent.

2. Use of personal information

We collect your personal information for the following purposes:

- to verify your identity;
- to enable us to establish and administer our products and services;
- for the purpose of managing our relationship with you, including dealing with your enquiries;
- to provide you with, monitor, and develop our website services;
- to deal with any enquiries or communications with you or any agency or representative, including any application for employment;
- to comply with our legal and regulatory obligations including any recommendation, request, rule, order or direction of any regulatory, governmental authority, securities exchange, court or tribunal;
- to conduct marketing activities, so for example, on occasion we may offer you other products and services;
- if you are applying to work for Smartgroup, to carry out the recruitment process, or assess your suitability for future roles with your consent;

and for any other purpose related to or ancillary to any of the above.

3. Disclosure of personal information

Depending on the product or service or your relationship with us, we may disclose your personal information:

- to your employer;
- to third party suppliers and vendors to the extent necessary for the establishment, provision, and administration of the applicable products or services (this may include car dealers, intermediaries, financiers, valuers, insurers, credit reporting agencies or lawyers/debt collectors). For example:
 - if you are an Autogenie client, we will disclose your personal information to your chosen car dealership;
 - if you are applying for or have a novated lease, we will disclose your personal information to, and otherwise deal with, the applicable financier and car dealership in setting up and administering your lease;
 - if you are applying for or have an insurance policy, we will disclose your personal information to the applicable insurer; or
 - if you have a salary packaging arrangement with us, we may disclose your personal information to applicable suppliers, for example, mechanics, fuel companies, statutory authorities in relation to vehicle registration/insurance, and superannuation funds for the purpose of processing your superannuation contributions.
- to our personnel, agents, contractors and service providers that are involved in providing, managing or administering the applicable products or services (eg printing and postal services and call centres);
- to those companies who provide information and infrastructure systems to us;
- to anyone acting on your behalf;

- to our professional advisors and consultants, accountants, lawyers and auditors;
- to anyone else in relation to whom you have provided us consent;
- to any company within Smartgroup;
- if you are applying to work for Smartgroup, your referees, the Australian Federal Police (to undertake criminal history checks), educational and professional obligations (to verify academic qualifications, licences and memberships), to organisations that conduct competence and psychometric tests, and the Department of Immigration and Citizenship (to verify your right to work in Australia);
- where we are required to do so by law.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- (a) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- (b) if required, that you have consented to us doing so.

One of the ways we store and manage information (including personal information) is by using cloud computing, where servers are based overseas including in Japan and the USA. We take reasonable steps to maintain the security of your information and to ensure your information is treated in accordance with the standards that apply in Australia.

4. Direct marketing

For some customers (depending upon our agreement with your Employer), we may from time to time use your personal information to provide you with current information about loans, insurance products, special offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company we are associated with.

If you do not wish to receive marketing information, you may at any time decline to receive such information by contacting us. Contact details are set out at section 10 of this policy.

If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

5. Accessing, updating and correcting your personal information

You can request to access your personal information we hold at any time. Depending on the volume or difficulty in obtaining the information, we may charge a fee that covers our costs.

An initial response will be provided to you within 7 days from your request, and the outcome of the investigation given in 30 days. There may be situations where we are not required to provide you with access to your personal information, and we will set out the reasons for this. An example of this would be where the information related to existing or anticipated legal proceedings, or if your request was vexatious.

You may also request to correct any of your personal information we hold if it is incorrect, inaccurate or out of date. We will generally rely on you to assist us in informing us if the information we hold about you is inaccurate or incomplete.

Depending on the request we may update your personal information immediately, or we may provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal or credit information within 30 days from your initial request.

We may have to consult with external entities as part of your request to access or correct your personal information.

6. Using government related identifiers

If we collect government related identifiers, such as your Drivers Licence Number or Tax File Number, we do not use or disclose this information other than to the extent required by law. For instance, we will never adopt your Tax File Number as your account number to identify you.

7. Doing business without identifying you

In most circumstances it will be necessary for us to identify you in order to successfully do business with you. However, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without you providing us with personal information.

When we are requested to obtain quotes from dealers for you, we do not release any information that would identify you. Once you select a quote from a dealer, we will then provide your contact details to that dealer so they may get in touch with you.

8. How safe and secure is your personal information that we hold?

We will take reasonable steps to protect your personal information by storing it in a secure environment, and when the information is no longer needed for any purpose for which the information may be used or disclosed, it will be destroyed or permanently de-identified. We store your personal information in paper and electronic form. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure. We do this by:

- installing security and access requirements for all our IT systems, such as passwords, firewalls and virus scanning software;
- having document storage and destruction policies;
- only providing you your personal information where we are satisfied as to your identity; and
- encrypting data and other personal information during internet transactions (if any).

9. Complaints

If you are dissatisfied with how we have dealt with your personal information, or have a complaint about our compliance with the Privacy Act, you may contact us using the details in clause 10.

We will acknowledge your complaint within seven days and provide you with a decision on your complaint within 30 days.

If you feel your complaint is still not resolved adequately after discussion with us, you may then take the complaint to the Credit Ombudsman Service (COSL) if it relates to our role as a financial services provider, or contact the Office of the Australian Information Commissioner on <http://www.oaic.gov.au/privacy/privacy-complaints>.

10. Further information

If you have any questions about how we handle your personal information, contact our Privacy Officer by phone on 1300 476 278, via email at privacy@smartsalary.com.au, or at:

Privacy Officer

Smartgroup Corporation Ltd

GPO Box 4244, Sydney NSW 2001.

11. Changes to our privacy policy

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. As a consequence we may change this privacy policy from time to time or as the need arises.