

Wpay Privacy Policy (Australia)

DATE 8th June 2022

We are Wpay Pty Limited (ABN 86 646 547 908) (**Wpay**), a payments service provider for merchants that is part of the Woolworths Group of Companies. This policy outlines the way in which we collect, hold, secure use and share personal information in connection with Wpay's merchant services business. Please see the 'How to contact Wpay' section below if you have any questions about our Privacy Policy or how Wpay handles your personal information.

What kinds of personal information does Wpay collect and how does Wpay use and disclose that information?

Wpay collects, holds, uses and discloses personal information to help us perform the following functions in order to deliver payments services to our merchant clients:

- *To comply with our legal and regulatory obligations (including Know Your Customer and Anti-Money Laundering obligations) and as part of our internal risk management activities, we may collect:*
 - Contact information
 - Government identifiers
 - Financial information such as your business bank account details and credit bureau report
 - Demographic information such as your age, nationality & gender
 - Business structure information such as trust deeds & business partnership agreements
 - Findings on domestic and international watchlists
- *To provide the Wpay Merchant services, we may collect:*
 - Information about transactions you make
 - Card/payment holder details
- *To respond to sales enquiries made on the Wpay website, we may collect:*
 - Name
 - Contact information
 - Information about your employment
- *To identify and investigate certain transactions, we may collect:*
 - Information about transactions you make
 - Your loyalty status
 - Customer identifiers
 - Shipping information

We may also use or disclose the personal information we hold:

- To analyse, maintain and improve our systems and improve usability, functionality and effectiveness of our services;
- To perform grouping, combining and anonymisation techniques to provide industry insights and never in a way that would identify your business or customers;
- For other purposes as authorised by you, or in accordance with your requests or instructions; and
- to meet any legal obligations.

Without this information we may not be able to provide you with our products or services (or with all of the features and functionality offered by our products or services) or to respond to queries or requests that you submit to us.

How does Wpay collect personal information?

Wpay may collect personal information:

- directly from you (e.g. when you make an enquiry on the Wpay website);
- from third party service providers that provide us with identity verification services, credit reporting and fraud services; and
- from government authorities to confirm the validity of documents provided; and
- from merchants who use our products and services.

Who does Wpay share personal information with and is personal information shared overseas?

We may share personal information with:

- other members of the Woolworths Group, only to provide you with the Wpay merchant services;
- regulators such as AUSTRAC if there is an adverse finding during onboarding or while we are providing services;
- ID verification providers;
- Card payment schemes such as Visa and Mastercard; and
- third-parties service providers.

Some of our service providers, including data storage and technology service providers, may be located or use locations outside of Australia.

Where we share personal information overseas, we take steps to ensure that our service providers are obliged to protect this personal information in accordance with Australian legal requirements and that they are only permitted to use personal information for the purpose for which it is shared.

Our service providers or their data storage servers may be located, and may store your personal information from time to time, in a number of countries, including New Zealand, the United Kingdom, United States, India and Japan.

How does Wpay store and secure personal information?

Your personal information is important to us. We design our systems with your security and privacy in mind.

Any personal information we hold is generally stored electronically in computers or cloud systems operated by us or by our service providers. We implement a range of information security measures and encryption protocols when we handle your personal information to protect it from unauthorised access, loss, misuse or wrongful alteration.

We also use security measures such as physical and technical security access controls or other safeguards, information security technologies, policies, procedures and training programs to ensure the security of your personal information.

How can I access or correct my personal information?

You have a right to request access to the personal information we hold about you and correct your personal information if it is inaccurate, out of date, incomplete, irrelevant or misleading.

However, before we provide you with access or correct your personal information we may require verification of proof of identity. There is no charge to submit a request to correct or access your personal information, however, we may charge a reasonable fee for giving access to your personal information if your request requires substantial effort on our part.

If you would like a copy of the personal information held by us about you, or if you would like to correct your personal information, please contact the Privacy Officer using the details shown in the 'How to contact Wpay' section below.

How can I make a complaint?

If you would like to complain about a breach of the Australian Privacy Principles, you may contact our Privacy Officer. We may ask you to put your complaint in writing and to provide relevant details. We may discuss your complaint with our personnel and our service providers and others as appropriate.

We will respond to your complaint in a reasonable period of time (usually within 30 days).

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved satisfactorily you are also entitled to make a complaint to the Office of the Australian Information Commissioner (**OAIC**). Contact details can be found at the OAIC's website:

www.oaic.gov.au

How to contact Wpay

If you have any questions about our Privacy Policy or the way in which we collect, hold, secure, use or share your personal information, please contact us:

Phone: 1300 908 631

Email: privacy@woolworths.com.au

Post: Privacy Officer

Woolworths Group Limited

PO Box 8000

BAULKHAM HILLS NSW 2153

Will Wpay change this policy?

Wpay may make changes to this policy from time to time, to take into account changes to our standard practices and procedures or where necessary to comply with new laws and regulations. The latest version of this policy will always be available on our website.