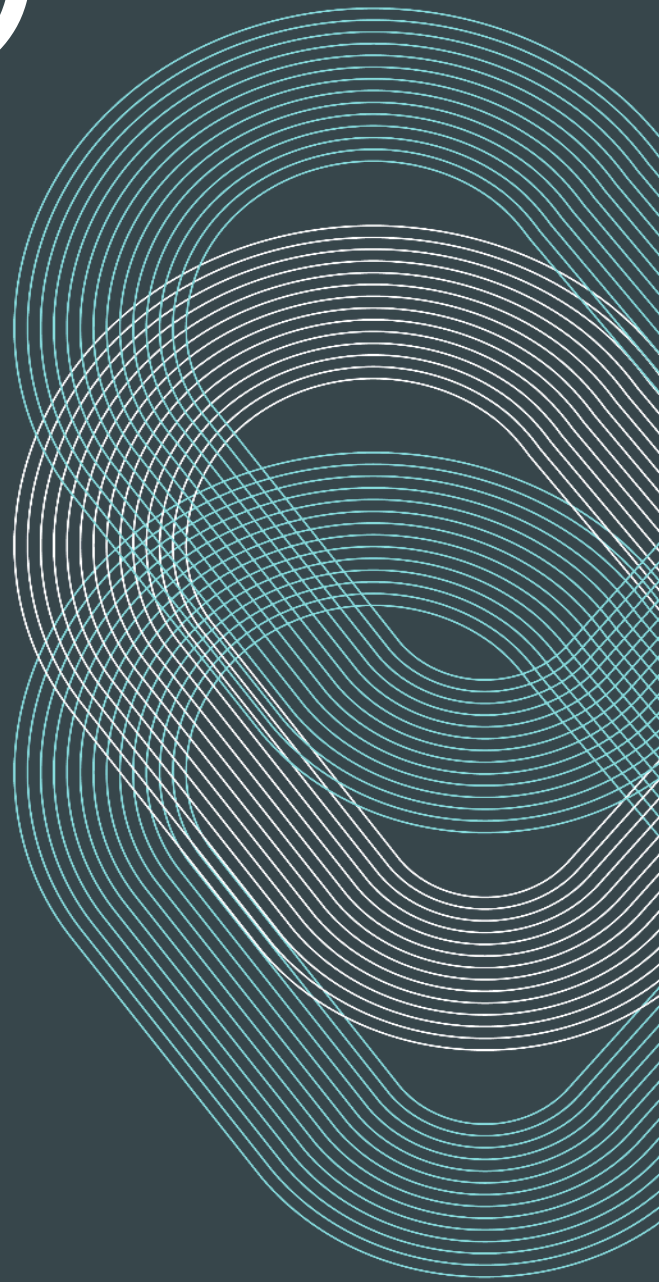


Wpay Privacy Policy (Australia)



27th July 2023



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 is personal information?

As defined by the Privacy Act 1988 (Cth), "personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

Any time we use the term "personal information" in this policy, we are referring to this legal definition of the term.

What kinds of personal information does Wpay collect and hold 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 for:

- **Improvement of our services and customer experience:** To test, review and improve the usability, functionality and effectiveness of our systems, products and services, for example call recordings for quality and training purposes;
- **Analysis and reporting:** To understand transaction preferences and patterns and to produce industry insights for you. Typically this involves grouping, combining and anonymisation techniques to filter customers, merchants and businesses into segments and matching them against other customers, merchants and businesses with similar demographics, market traits, and shopping and transaction behaviours;
- **For other purposes as authorised by you,** or in accordance with your requests or instructions; and
- **Purposes permitted or required by law.**

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 to facilitate payment transactions.

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 that we have engaged to assist us with certain functions, including but not limited to data storage, combining and analysing data and processing data, security and fraud detection.

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 may collect information from your current device using cookies or other technologies, including your online browsers or apps to protect your account security.

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 our Privacy Office 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 Office. 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 you disagree with our decision, you may refer your complaint to the Office of the Australian Information Commissioner (**OAIC**) (whose contact details are as set out [here](#)).

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 Office

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.