



# AFTG Customer Privacy Policy

**Policy Level: 1**

Accountability: Legal and Risk

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# AFTG Privacy Policy

## 1 Introduction

This Privacy Policy (**Policy**) sets out the requirements for privacy compliance across the AFT Group of companies (**AFTG Member**). This Policy applies to all employees, contractors and suppliers of AFTG and any third party with a commercial relationship with any AFTG Member.

For EU Residents, AFTG complies with the European Data Protection Directive 95/46/EC and that Directive will apply.

This document explains:

- a) What personal information or data We collect.
- b) How and why We collect Your personal information or data.
- c) How We store Your personal information or data.
- d) Your personal information or data protection rights.
- e) How We use cookies and how You can manage cookie options.
- f) Updates to our privacy terms and conditions.
- g) How to contact Us and appropriate privacy authorities.

## 2 Definitions

**AFTG** and **AFTG Member** means Alpha Payments Cloud Holdings Pte Ltd, Alpha Payments Cloud Pte Ltd and each wholly owned subsidiary and related bodies corporate, and AFTG Member means any single AFTG entity.

**AFTG Personnel** means for the purpose of this Policy, all AFTG director, officers, employees, contractors and third party service providers.

**AFTG Third Party** means any service provider engaged by any AFTG Member to provide a service to or support a service provided by any AFTG Member.

**You and Your** means a customer or end user of any of Our services or Our website.

**Us, We and Ours** means AFTG.

## 3 Your consent and agreement

When You use Our services or access our website, You consent to Us collecting personal information or data during Your dealings with Us. This includes when You register for any of Our services or request to open an online user account with Us.

Your personal information or data may be shared with AFTG Third Parties where an AFTG Third Party is part of a service We provide to You. This means We may match data held by Us and the AFTG Third Party (for example this may be a merchant/payment processor or financial institution) involved in providing a part of Our service to You.

Your personal information or data may also be used in any claim to recover a loss because of suspected fraud where We provide certain financial processing services to You, or where We are required to comply with a legal or regulatory obligation.

Our website may contain links to other non-AFTG websites. We are not responsible for the privacy policies of those other websites and We recommend You review the privacy policies of each non-AFTG website that You visit.

## 4 What personal information or data do We collect?

When You use any of Our services including our portal or browse Our website, We collect information about Your dealing with Us, including:

- a) details about any payment transaction You caused while using Our service(s);

- b) the domain and host You access the Internet from;
- c) the IP address of the mobile device or computer You are using and the ISP You are accessing;
- d) the geo-location of Your computer or device;
- e) Your name;
- f) Your address;
- g) Your email address; and
- h) Your telephone number.

We do not collect or store primary forms of identification such as Your passport or Your driver's licence, birth certificate or Your bank account log-in credentials. If these primary identification forms are requested by Us to provide a service to You, We will let You know when this data is required to fulfil a regulatory obligation before providing a service to You.

## **5 How and why We collect and use Your personal information or data**

The personal information or data collected by Us will be used for the purpose(s) consistent with the reason You provided it to Us, or for another related purpose where We are required or permitted by law to do so, including:

- (a) used to identify You;
- (b) check that You are eligible to receive a product or service from Us;
- (c) help You with a product or service enquiry;
- (d) to comply with a legal or regulatory obligation.

Information collected while You are using our service may also be used to analyse trends, administer the service, improve site performance, gather broad demographic information, and for security purposes.

In some cases We may receive data or personal information about You from AFTG Third Parties and this may happen without Your direct involvement, for example:

- a) publicly available sources of information such as public registers;
- b) Your nominated representative (where You have elected to allow another person to act on Your behalf);
- c) other organisations who together with any AFTG Member provide products and services to You;
- d) commercial information bureaus and service providers that offer fraud or credit checking and protection reporting and verification services.

We will collect personal information from You by lawful and fair means. If You choose to not provide Your personal information when requested, We may not be able to offer or deliver Your selected product or service. We will tell You when this occurs so You can decide if You wish to receive the product or service from Us.

In some cases, where it is lawful and practicable to do so, You may interact with Us by using a pseudonym (an alias) but in most cases, it will not be practicable to do this as Your identity may require validation or verification in order to receive selected services from Us.

## **6 How we store and protect your personal information or data**

We are committed to:

- (a) Safeguarding all personal information that is provided to Us;
- (b) Ensuring that all personal information is maintained in confidence;
- (c) Ensuring that all personal information and data is stored in a secure environment both electronically and on Our physical premises;
- (d) Taking all reasonable steps to ensure We comply with the privacy requirements of the regions that We operate in.

AFTG maintains physical, electronic and procedural safeguards to protect personal information and data from misuse, interference, unauthorised access, modification or disclosure, and loss or corruption by computer viruses and other sources of harm. Access to personal information and data is restricted to AFTG Members, AFTG Personnel and AFTG Third Parties who have a need to know that information.

In accordance with the Privacy Act, We are required to notify You and the Australian Information Commissioner if We become aware of a data breach (such as an unauthorised disclosure of or unauthorised access to personal information, or a loss of data) where that breach is reasonably likely to result in serious harm. This will apply even if Your personal information or data is being held offshore.

## **7 Your personal information or data protection rights.**

**Right to access.** You have the right to request copies of Your personal information by making a request in writing to Us. You can use the contact Us section below to submit a request to Us in writing by email or mail. We will then review Your request and respond within 28 days of receiving Your request.

**Right to rectify.** You have the right to request that We correct any data or personal information that You believe is inaccurate or out of date or incomplete.

**Right to erasure.** You have the right to request that We permanently de-identify or remove/erase Your personal information or data from Our records, under certain conditions not subject to any legal or regulatory retention obligation.

**Right to restrict processing.** You have the right to request Us to restrict the processing of Your personal information or data, under certain conditions including where the restriction does not disrupt Our ability to provide You with the services.

**Right to data portability.** You have the right to request Us to transfer Your data or personal information that We have collected to another organisation.

**Exceptions.** Your right to access Your data or personal information is not absolute. In some circumstances, the law permits Us to refuse Your request to provide You with access to Your personal information.

## **8 How We use cookies and how You can manage cookie options.**

A "cookie" is a packet of information stored on Your computer that allows Us to identify and interact more effectively with Your computer. Two types of cookies can be used, a temporary/session cookie or a persistent cookie.

Cookies are used by Us to collect information, where available, about a computer or mobile device for system administration purposes, such as IP address, operating system and browser type. Information collected by Us through the use of cookies will only be used by Us to evaluate the effectiveness of Our website and to improve the user experience.

Cookies are not used to identify an individual or to send targeted advertising and You can disable cookies by adjusting Your browser settings. Refer to the help menu in Your browser to learn how to change Your cookie preferences. Please note that if You disable all cookies, You may not be able to receive or access either some or all services from our website.

## **9 Websites**

Our website may include hyperlinks to other websites that are entirely owned and controlled by others outside of the AFTG. We are not responsible for the privacy practices of these websites. By accessing or using Our website, You consent to the collection, use and disclosure of personal information as described in this Policy under clause 3 above.

## **10 Updates to our privacy terms and conditions.**

We will update this Policy from time to time so please check Our website for updates. This document was last updated in August 2019.

## 11 AFTG Privacy Officer contact details

By Email: [privacy@alphafin.tech](mailto:privacy@alphafin.tech)

By Post: The Privacy Officer, Level 7, 76 Flinders Street, Melbourne, Victoria, 3000

We will respond to requests to correct personal information within a reasonable time but no later than 30 days from receiving Your request.

## 12 Complaints

If You have a question, concern or complaint about how Your personal information or data is handled by Us, or You believe that We have not complied with this Policy, You can make a complaint in writing to Our Privacy Officer at the details above.

We will review and respond to Your complaint as soon as possible, and generally within 30 days of receiving it. If You remain unsatisfied after You have received Our response, Your complaint can be referred to the following data protection offices depending on your location as set out in the table below if Your Complaint about a concern regarding mishandling of Your personal information or data:

Location	Link
Australia	Office of the Australian Information Commissioner (OAIC) W   <a href="https://www.oaic.gov.au/about-us/contact-us">https://www.oaic.gov.au/about-us/contact-us</a>
European Union Member States	Data Protection Office in your country of residence: W   <a href="https://edpb.europa.eu/about-edpb/board/members_en">https://edpb.europa.eu/about-edpb/board/members_en</a>
Singapore	Personal Data Protection Commission W   <a href="https://www.pdpc.gov.sg/Individuals/Complaints-and-Reviews">https://www.pdpc.gov.sg/Individuals/Complaints-and-Reviews</a>