

# Privacy Policy

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## What is this Privacy Policy?

Australian Payments Network Limited (ABN 12 055 136 519) (“**AusPayNet**”, “**we**” and “**our**”) is committed to protecting and maintaining the privacy, accuracy and security of an individual’s personal information.

This Privacy Policy describes how AusPayNet manages the personal information that we may collect, hold, use or disclose for the purposes of our functions and activities.

We may modify or amend this Privacy Policy from time to time. This Privacy Policy was last updated on 30 June 2023.

## AusPayNet’s Role in the Payments Industry

AusPayNet exists to create confidence in payments including by:

- setting enforceable industry standards for a safe, reliable and effective payments system;
- leading transformation in payments to drive efficiency, innovation and choice; and
- being the home for ecosystem collaboration and strategic insight.

As Australia’s leading payments industry representative organisation, it is our role to promote:

- thought leadership;
- industry collaboration;
- self-regulation; and
- system-wide standards.

We work with government and public regulators and undertake our activities with transparency, fairness, rigour and integrity.

AusPayNet is bound by the private sector provisions (other than the credit reporting provisions) of the *Privacy Act 1988* (Cth) (“**Privacy Act**”).

Our policy is to comply with those provisions of the Privacy Act. This policy is made in accordance with Australian Privacy Principle 1, and describes AusPayNet’s policies for handling personal information that we may collect, hold, use or disclose for the purposes of our functions and activities.

## What personal information does AusPayNet collect and hold?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

The personal information we collect and hold may include your name, title, address, IP addresses, email address, phone number, any interactions you have with us, other contact details, and other information that we consider is reasonably necessary so we can perform our functions and activities.

We may collect information about you which is considered sensitive under the Privacy Act. For example, sensitive information may be collected and held by us to prepare, display and/or publish speaker biographies for events we may hold. If you apply for a job with us, we may collect sensitive information if it is relevant to the role you are applying for and you consent to share it, such as criminal history. We may also collect sensitive information of our employees in the ordinary course of the employment relationship.

## **How is personal information collected?**

As well as collecting personal information from you directly when you visit our website or when you otherwise interact with us, we may collect personal information from other channels, including:

- from initial membership applications;
- from cookies on our website and extranet site and via forms presented on certain secure sites;
- when you interact with us by any method (such as telephone, email, post or in person);
- from correspondence and other written material sent to us;
- from publicly available sources of personal information such as newspapers, electronic media, records of proceedings and public registers; or
- in limited circumstances, third parties.

Where possible, we will allow you to interact with us anonymously or using a pseudonym.

However, for most of our functions and activities we usually need your name and contact information.

## **Our website**

When you visit our website, your domain name is recorded in our logs. This information is used for statistical and web development purposes only. Our web servers may automatically collect other information when you visit our website, including your IP address, the date and time of your visit, the parts of our website you access during your visit, your actions on our website, and the browser you are using. AusPayNet also collects personal information from this website through receiving subscription applications and emails.

Further, AusPayNet uses external service providers, such as Google Analytics, Mailchimp and Mimecast, to analyse traffic on this website or on AusPayNet's email system, and improve the services provided by AusPayNet. Generally, information collected through such analysis is anonymous.

External service providers such as Google Analytics collect information about your use of our site by using cookies to analyse a (anonymous) user's behaviour and generating what type of users visit a webpage and what a user does once they get there. Further information about how Google Analytics uses information collected from sites that use Google Analytics can be found on <https://policies.google.com/technologies/partner-sites>.

## **Purposes of using and disclosing personal information**

In general, AusPayNet will use and disclose your personal information for the following purposes:

- to conduct AusPayNet's business;
- to provide, manage and enhance AusPayNet's services (including provision of the website and extranet);
- to communicate with you;
- to facilitate communication between members, as well as between members and other participants in the payments industry;
- to collect ideas and views for the purposes of representing the interests of our members; and
- marketing activities.

## **Disclosure of personal information**

We may disclose personal information to:

- our members;
- comply with legal process, law enforcement and other government and regulatory authorities as required or authorised by law, or where you may otherwise consent;
- external parties such as your representatives, including your legal advisers;
- our representatives, such as our legal advisers;
- our service providers who help us conduct our business and improve services, such as printing and posting services, event registration services, and third party IT providers and other organisations involved in the provision and maintenance of our business systems and infrastructure;
- include it in, and maintain, our public registers;
- provide business contact lists for the public to make certain enquiries, including in our publications and on our website; and
- those organisations where you have consented.

AusPayNet works closely with other payments industry representative organisations and associations in other countries. If required, we may disclose your personal information to these organisations and associations. We may also disclose your personal information to our service providers who are based overseas or need to access, store or transfer personal information overseas. Where information is shared with these third parties, we will observe the applicable Australian Privacy Principles.

In connection with any specific occasion on which such a disclosure may occur, at or before the time we collect your personal information, due to circumstances which change from time to time it is not practicable for us to specify the countries in which these recipients are likely to be located.

Where your personal information is disclosed, we will seek to ensure that the information is held, used or disclosed consistently with the applicable Australian Privacy Principles.

### **Management and protection of personal information**

We hold and store your personal information securely, including in archives maintained by a third party information storage provider domiciled in Australia, having regard to its nature and source. Arrangements are in place to safeguard the information against unauthorised access, modification, disclosure and interference and from loss and misuse. These security arrangements include a range of physical, electronic and network security controls such as password protection, multi-factor authentication, firewalls, regular security audits and penetration testing. These controls are supported by internal policies and processes, and also training for our team members.

We train our staff about the requirements of the Privacy Act and the need for compliance with the Privacy Act. Additionally, we have a designated person within our office, the General Counsel, who oversees our overall compliance with the Privacy Act and this policy.

If you would like more information about how we manage your personal information, please contact us (see “Contact details” below).

### **Accessing and correcting your personal information**

You may request access to your personal information that we are holding. If you require access to your personal information, please contact our General Counsel as described in “Contact details” below. Before giving you access, we may need to establish your identity by sighting some form of identification or asking you some questions.

You may ask us to correct your personal information that we are holding if you believe it is incomplete, inaccurate, irrelevant, out of date or misleading.

This access is subject to some exceptions allowed by the Privacy Act. For example, we can deny you access where access would:

- be unlawful;
- pose a serious threat to the life, safety or health of an individual or to public health or safety;
- have an unreasonable impact on the privacy of others;
- involve disclosure of a commercially sensitive decision making process;
- prejudice enforcement activities such as criminal proceedings or negotiations with you; or
- reveal certain information relevant to legal dispute resolution proceedings.

We may also deny your request for access if it is frivolous or vexatious.

We may charge a reasonable fee to fulfil your request.

If we refuse to provide you with access to the information, we will provide you with reasons for the denial of your request and inform you of any exceptions relied upon under the Australian Privacy Principles (unless it would be unreasonable to do so).

We take reasonable steps to ensure that your personal information is accurate, complete, and up to date whenever we collect or use it. If the personal information we hold about you is inaccurate, incomplete, irrelevant or out-of-date, please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

### **Complaints and queries about privacy**

If you have any queries with regards to our collection, use or management of your personal information or believe AusPayNet has breached its obligations under the Privacy Act, you may contact the General Counsel at AusPayNet.

Your query or complaint may be made by email (see “Contact details” below).

We will acknowledge receipt of your complaint as soon as possible and will attend to your complaint and endeavour to resolve it as soon as possible.

If you are not satisfied with our response, you are entitled to complain to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

We are unable to handle or assist you with a privacy complaint involving a financial institution which is an AusPayNet member.

If you have a privacy complaint about an AusPayNet member, you should make your complaint directly to the financial institution concerned.

### **Contact details**

Email: [info@AusPayNet.com.au](mailto:info@AusPayNet.com.au)

Please note in subject title: “Att: General Counsel re Privacy”

### **Need more information?**

If you would like more information about privacy and the Privacy Act (including the Australian Privacy Principles), you can access the Office of the Australian Information Commissioner’s website at <https://www.oaic.gov.au/>.