

# Privacy Policy

Effective Date: 13 February 2020

## About this Privacy Policy

This Policy applies to all the website owned by, and products and services offered by, or on behalf of,

**Meldcx Pty Ltd ACN 621 013 410** and its related bodies corporate including Meldcx USA Inc. ( **we, us and our** ).

We are committed to the protection of your personal information in accordance with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) and applicable US Laws. This Policy sets out how we collect, use, manage and store personal information. It is important that you read this Policy carefully because anytime you use our products or services, you consent to the practices we describe in the Policy. If software or services are provided for use in the United States (“US”), see the specify terms herein related to the US. If you do not agree to the practices described in the Policy, you should not use our products or services.

This Policy should be read in conjunction with, and is subject to:

1. any other privacy or collection statement that we may provide to you when we collect your personal information or provides a particular product or service; and
2. any terms and conditions of use which govern your access to and use of each of our products and services.

We may change this Policy at any time. If we make changes to this Policy we will notify you by publication on our website at [www.meldcx.com/privacypolicy](http://www.meldcx.com/privacypolicy) . The revised version of the Policy will be effective at the time we post it. You can check the “effective date” posted at the top to see when the Policy was last updated.

## Collection and Use of Information

We may collect personal information (which means any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true, and whether or not the information or opinion is recorded in a material form) from you directly or via your use of our products and services. We will only collect personal information which is reasonably necessary for, or directly related to, our functions or activities.

The personal information that we may collect or hold can include your name, your address/es, your telephone number (including mobile phone number), your username and password, internet protocol (IP) addresses, MAC addresses, any other personal information you submit to us, and other personal information that we consider is reasonably necessary to perform our functions and activities.

We collect personal information in a number of ways, including:

1. from you directly, when you provide information on a hard copy form, by email, by phone, in person, or when you submit your personal details, including submitting through our website, online forms or our software;
2. from third parties such as our service providers and business partners;
3. through marketing and business development events; and
4. from publicly available sources of information.

Most personal information will be collected in association with your use of our website or software, an enquiry about our products or services, or generally dealing with us. If you choose not to provide certain information about you, we may not be able to provide you with the products or services you require.

If, at any time, you provide personal information or other information about someone other than yourself, you warrant that you have that person's consent to provide such information for the purpose specified in this Policy.

We collect, use and disclose personal information for the primary purpose of conducting our business, which includes:

1. verifying your identity;
2. verifying your eligibility to register as a user of our website or software;
3. customising the content you see on our website or software;
4. providing you with products and services;
5. administering those services;
6. processing a transaction between you and us on our website or via our software or by other means;
7. delivering our product and service update notices to you;
8. developing and improving our website or software;
9. contacting you;
10. responding to your queries or complaints;
11. direct marketing to you;
12. complying with any legal obligations that we may have under laws that apply to our business; and
13. any other matters that may reasonably be expected in connection with the above matters, where we have obtained consent for other collection activities, or are otherwise required to do so by law.

In conducting our operations, we may share your personal information with third parties such as our contractors, outsourced service providers and business partners where necessary for us to do any of the above things, or for them to offer or provide their services to you.

## Other Uses of Information

We may collect, hold, use, disclose and may share personal information as permitted by law to provide products or services to our customers and to enable you to manage your affairs with our customers. We may disclose your personal information to third party providers of business or administrative services, such as file storage services, database and mailing services, cloud hosting services, marketing services, identity verification services, and other information technology services. We may also disclose your personal information to our professional advisors and agents, which may include:

1. developing and improving our products, client service, and relationships;
2. developing and communicating to customers, current and prospective;
3. investigating into any complaints about our customers or if we have reason to suspect that our customers are in breach of any of our terms and conditions governing access to or the use of Remitter platform or have otherwise engaged in any unlawful activity; and as required by law.

We may use and disclose your personal information for secondary purposes as permitted by law.

## Sensitive Information

Sensitive information is any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information.

We will not ask you to disclose sensitive information, but if you elect to provide sensitive information it will also be captured and stored.

## Information from Third Parties

Our website may also contain links to the websites of third party providers of goods and services ( **Third Party websites** ). If you have accessed Third Party websites through our website and if those third parties collect information about you, we may also collect or have access to that information as part of our arrangements with those third parties.

Where you access a Third Party website from our website, cookie information, information about your preferences or other information you have provided about yourself may be shared between us and the third party.

## Cookies

On our website, “cookies” are generally used to record how people use our website. A cookie is small bits of information that are stored on your computer’s hard drive which records how you have used a website. It helps us improve and upgrade our website based on usage of the website. It also means that when you go back to our website, the site can give you customised options based on the information the cookie has stored about your last visit. You can generally modify the settings of your browser to prevent it from accepting cookies. While cookies do not personally identify you, they do identify your browser.

If you do not want us to use cookies in your browser, you can set your browser to disallow cookies or to let you know when a website attempts to put a cookie on your computer. However, you may not be able to use some aspects of our website without cookies.

We use cookies for different purposes such as:

- to allocate a unique number to your internet browsers;
- to customise our website for you;
- for statistical purposes;
- to identify if you have accessed a Third Party website; and
- for security purposes.

## IP Addresses

Your IP address is the identifier for your computer when you are using the internet. It may be necessary for us to collect your IP address for your interaction with various parts of our website, product or services.

## Overseas Disclosure

We may disclose your personal information to recipients located outside Australia who provide services to us (for example, we may disclose your personal information to third parties who provide website hosting services to us). This will include, for example, the USA and the EU.

When we disclose personal information overseas we will take reasonable steps to ensure that the overseas entity complies with the Australian Privacy Principles, unless an exception applies under those principles such that we are not required to do so. We will take reasonable steps to put in place suitable confidentiality protections in relation to personal information we provide to an overseas entity.

## Storage and Security of Personal Information

Where we hold your personal information, we will take reasonable steps to ensure that the information is secure and may only be accessed by authorised persons.

Where we store personal information electronically, we endeavour to secure that information, using both physical and technical means, in accordance with industry practice, including the use of secure servers with password protection and strict access controls. We endeavour to review and update our security procedures from time to time, in order to renew and improve those procedures.

In limited situations, where a customer has requested our assistance, our technical staff or outsourced technical service providers may have access to customer data, which may include personal information, for troubleshooting and technical assistance, but only to the extent necessary for the completion of those services and subject to applicable confidentiality and privacy restrictions.

Although we take reasonable measures to ensure the security of personal information stored by us, we cannot guarantee that they are absolutely secure from malicious third party circumvention of security measures on our electronic resources (including our website and app), whether those resources are at any of our premises or those of our services providers.

Please note that third party recipients of personal information, including our service providers that provide the information, may have their own privacy policies and we are not responsible for their actions, including their handling of personal information.

We cannot control the actions of other users with whom you share your information. Further, we cannot guarantee that only authorised persons will access your personal information. Please notify us immediately if you believe there has been any unauthorised access to your information.

If any personal information that we hold is no longer required for the purpose for which it was collected and no applicable law requires us to retain that information, we will take reasonable steps to de-identify or destroy the information in accordance with applicable law.

## **Access To and Correction of Personal Information**

We will use reasonable steps to ensure the personal information we hold is complete, up-to-date and accurate, so far as it is practicable for us to do so.

You may request access to the personal information we hold about you by contacting us using the details set out below. We may, at our discretion, provide you with access to your personal information and we reserve the right to charge you a reasonable fee for giving such access.

Subject to the paragraph below, if personal information we hold about you is incorrect, we will, on your request to correct it or where we are satisfied that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, take such steps as are reasonable in the circumstances to ensure that the information is corrected.

If you request us to correct personal information that we hold about you and we refuse to do so, we will, to the extent reasonable, provide you a written response as to our reasons.

## **Direct Marketing**

From time to time, we may use your personal information for marketing purposes (for an indefinite period, including after you cease using our services). This includes sending you updates about new products and services we are offering. When we contact you, it may be by mail, telephone, email, SMS or through any other means. When we use or disclose your personal information for the purpose of marketing, we will:

1. allow you to 'opt out' or in other words, allow you to request not to receive further direct marketing communications of the relevant type; and
2. comply with a request by you to 'opt-out' of receiving further communications of that type within a reasonable timeframe.



You may ask to be removed from our marketing lists for any or all types of direct marketing at any time by contacting us using the details set out below.

## How We Protect Your Information

We take all reasonable steps to protect your personal information from unauthorized access, modification or disclosure, including misuse, interference, and loss. We secure such information in accordance with industry standards.

We use encryption to transfer personal information; however, the security of online transactions and communications sent electronically and by US Mail cannot be guaranteed. Our customers provide information to us at their own risk.

If you suspect any misuse or loss of, or unauthorized access to their personal information, please let us know immediately by contacting our Privacy Officer using the information provided below

## Consumer Choice and Your Rights

We strive to ensure that any personal information that we collect and hold is accurate, complete, and up to date.

If you believe that the personal information that we hold is inaccurate, incomplete, or outdated, please our Privacy Officer using the information provided below.

## Privacy Notice Changes

The continued use of this website by you constitutes agreement with this Privacy Policy, as amended from time to time. This Privacy Policy was last updated in February 2020. We encourage you to periodically review this page for the latest information on our privacy practices.

## Questions and Complaints

If you have a question about how we handle personal information, or wish to lodge a complaint about our management of personal information, you may contact our Privacy Officer by email to [privacy@meldcx.com](mailto:privacy@meldcx.com) .

Our Privacy Officer will coordinate the investigation of any complaint and any potential resolution of a complaint. We will aim to resolve all complaints as soon as practicable.