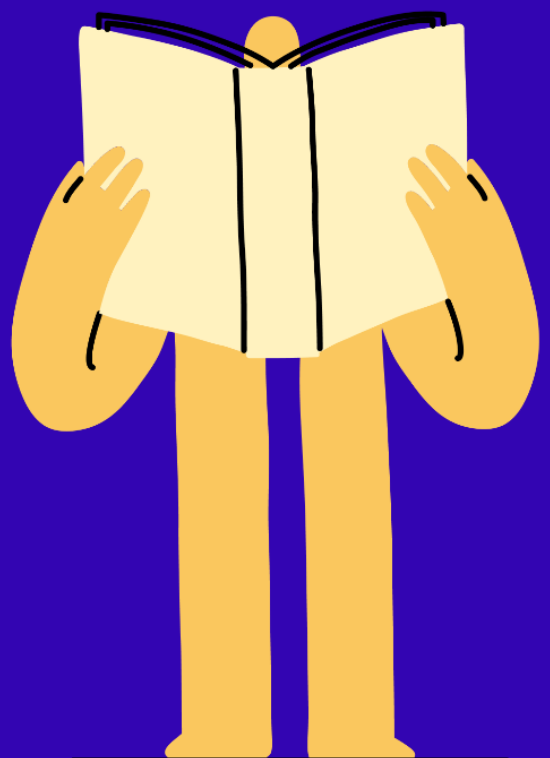


# Privacy Policy

August 2023



# Beem Privacy Policy

## 1. About us

- 1.1. Digital Wallet Pty Ltd (ABN 93 624 272 475) (Australian Financial Services Licence 515270) (**Beem, us, we**, or the **Company**) provides a peer-to-peer payments facility/mobile application called 'Beem' (**services**). This privacy policy applies to products and services provided by us.
- 1.2. The Company is a wholly owned subsidiary of Australian Payments Plus Limited (ABN 19 649 744 203) (**AP+**). AP+ brings together Australia's three domestic payment providers, BPAY, eftpos (which includes Beem) and NPPA (**AP+ Group**). AP+ Group has a group privacy policy which should be read in conjunction with this privacy policy and applies to recruitment, employee and supplier personal information for the general business purposes of the AP+ Group. The AP+ Group's privacy policy is available at <https://www.auspayplus.com.au/privacy-policy/>.

## 2. Your privacy is important to us

- 2.1 We have adopted an approach to personal information handling that is consistent with the Privacy Act 1988 (Cth) (**Privacy Act**), the Australian Privacy Principles (**APP**) and the APP guidelines.
- 2.2 You can find more information regarding how we deal with personal information in our product disclosure statement and terms and conditions which is available at <https://beem.com.au/terms>.
- 2.3 We understand that your privacy is important to you, and we value your trust. We are committed to the protection of your personal information and to compliance with applicable privacy laws.

## 3. Personal information

- 3.1 Personal information and/or personal data (the terms commonly used in applicable privacy laws) is information or an opinion about an identified or reasonable identifiable individual, whether or not the information or opinion is true and whether or not the information is recorded in a material form.

## 4. Types of personal information we collect

- 4.1 We collect and hold personal information about individuals for the provision of the services and purposes connected to those services.
- 4.2 The types of personal information we may collect and hold includes:
  - 4.2.1 **Identity and contact details** – including your full name, gender, address, date of birth, age, telephone number, email address and other contact information and identification information; ;
  - 4.2.2 **Financial information** – information associated with your payment and card details, including (if applicable) digital wallet details about your financial institution and your service providers;
  - 4.2.3 **Digital information** – text of written and oral communications gathered in the course of our interaction with you, including where you comment within our platforms and/or otherwise interact on live-chat, social media and emails, including feedback and online reviews and other information from your interactions with us online, including cookie information, IP address, URL's search histories and other associated information;
  - 4.2.4 **Shopping information** – where you use the Beem app to shop at eligible merchants, loyalty program information, shopping cart details, preferences and habits;
  - 4.2.5 **Other information for recruitment related activities** – if you apply for employment with us, employment history and related records, skills and experience,

- superannuation records, tax information including TFN according to legal requirements information about your personality, preference data;
- 4.2.6 **Verification information** – mobile device ID and types of identification details for verification purposes including driver's licence, Medicare card, Australian passport, ID card issued by a foreign government, personal TFN or birth certificate; and
  - 4.2.7 **Information from your use of Beem** – transaction information, including details you enter in the Beem app, such as the card you have registered for payment to be made and received, as well as your location information, any third party sites you access and other details of your interaction with us.
- 4.3 We may also collect information about you that is publicly available.
  - 4.4 We try not to collect unsolicited information about you but where that is collected, we will not retain it unless it is necessary for a legitimate business purpose and will use and disclose it only as specified in this privacy policy.

## 5. How we collect and hold personal information

- 5.1 We may collect personal information as follows:
  - 5.1.1 Directly from you, including in the course of providing our services and/or when you visit our websites and other online platforms and applications, including through the use of cookies (data files placed on your device or computer);
  - 5.1.2 From third parties where it is unreasonable or impractical to collect the information directly from you, for example, from banks, retailers, merchants, payment service providers and payment processors and from other entities that provide payment processing, disputes, chargeback handling and related services;
  - 5.1.3 From third party retailers for the purpose of designing and administering payment products;
  - 5.1.4 From publicly available sources of information, such as social media; and
  - 5.1.5 By uploading and storing contacts from your phone contact list to our servicer to connect you with other Beem users. You can adjust the contact list permissions within the app.
- 5.2 Personal information is held securely, is subject to various security protections and is held only for as long as the information remains relevant to the purpose for which it was collected, and in accordance with our business needs and legal requirements (which may include holding the personal information with a third-party storage provider).
- 5.3 We will destroy or permanently de-identify your personal information we are holding when it is no longer needed for the purpose for which we collected it. When we destroy your personal information, we will ensure that this is carried out properly and securely.

## 6. Purposes for which we hold, use and disclose personal information

- 6.1 We will not use or disclose personal information for any secondary purpose, unless that secondary purpose is related to the primary purpose for which we have collected that information, and you would reasonably expect the disclosure in the circumstances, or unless you consent to that use or disclosure.
- 6.2 While you are under no obligation to provide us with your personal information, we may, unfortunately, not be able to provide you with the products, services or information which you require if you do not provide us with:
  - 6.2.1 The personal information we ask for; or
  - 6.2.2 Consent to disclose that information to other entities.
- 6.3 We may otherwise use your personal information for purposes, including to:
  - 6.3.1 Verify your identification using a third-party provider, their systems and services which may include the transmitting of your personal information to and from Australia;
  - 6.3.2 Match your identification against an official record holder;
  - 6.3.3 Attend to matters relating to product provisioning, loyalty program support, business analysis or dispute resolution;

- 6.3.4 Minimise risks and identify or investigate fraud and other illegal activities;
  - 6.3.5 Improve our service to you and your experience with us, including through matching and analysing transactions data and creating de-identified and aggregated demographic and behavioural insights;
  - 6.3.6 Communicate information about our products or services or third party products or services we believe may be of interest to you;
  - 6.3.7 Where you have consented, provide you with information or advertising relating to our products or services (including targeted advertisements) or marketing communications we believe may be of interest to you;
  - 6.3.8 Collaborate on projects in respect of our products and services with our related bodies corporate;
  - 6.3.9 Facilitate our internal administrative, research, planning, marketing and product development purposes;
  - 6.3.10 Comply with laws and assist government or law enforcement agencies;
  - 6.3.11 Contact your card provider to help resolve a chargeback concern; and
  - 6.3.12 For other reasons incidental to the above, but only to the extent permitted or required by law.
- (primary purpose)**

6.4 We may also disclose personal information to:

- 6.4.1 Users;
- 6.4.2 Parent companies, other affiliates and related bodies corporate;
- 6.4.3 Government and law enforcement agencies where we are required or authorised to do so by law, including in response to a lawful request by any government, regulatory body or enforcement agency;
- 6.4.4 Service providers (including those overseas), but only for the purpose of providing goods or services to us, including direct marketing and communication agencies, identification verification agencies and entities that help us meet our regulatory compliance obligations;
- 6.4.5 To entities involved in connection with a corporate merger, consolidation, restricting, the sale of substantially all of our interests and/or assets, or other corporate change requiring the transfer of assets, including during the course of any due diligence process, to the purchaser or surviving entity; and
- 6.4.6 Other banks, financial institutions and relevant organisations – for example if we have to process a claim for mistaken payment or help resolve a chargeback concern.

6.5 Where your information is sent overseas, it is likely to be because our service providers use servers and databases located in the United States of America, Singapore, Malaysia, the United Kingdom, Ireland, Germany, Romania and Turkey. Regardless of the location of our processing, we will impose adequate data protection safeguards and implement appropriate measures to ensure that your personal data is protected in accordance with applicable data protection laws.

## 7. Keeping your information safe

- 7.1 We aim to only keep your information for as long as we need it.
- 7.2 We store your electronic records in secure buildings and systems or use trusted third parties. We also take the following measures, among other things, to protect your information:
  - 7.2.1 **Staff training** - We train our staff in how to keep your information safe and secure;
  - 7.2.2 **Secure handling and storage** - When we send information overseas or use third parties that handle or store data, we put arrangements in place to protect your information;

- 7.2.3 **System security** - When you log into our websites or apps, we encrypt data sent from your computer to our systems so no one else can access it. We have firewalls, intrusion detection and virus scanning tools to stop viruses and unauthorised people accessing our systems. When we send your electronic data to other organisations, we use secure networks or encryption. We use passwords to stop unauthorised people getting access;
- 7.2.4 **Building security** - We use a mix of secure card access, cameras, and other controls in our buildings to prevent unauthorised access;
- 7.2.5 **Destroying or de-identifying data when no longer required** - We aim to keep personal information only for as long as we need it – for example for business or legal reasons. We retain your personal information used to verify your identity and transaction information while you continue to be a user of the Beem app and for seven years after you have stopped using our services. When we no longer need information, we take reasonable steps to destroy or de identify it; and
- 7.2.6 **Service Providers and other counterparties** - where we engage with service providers and others to help us provide the features of the Beem app to, we contractually require those service providers to comply with the Privacy Act and other relevant privacy laws.

## 8. Changes to this privacy policy

- 8.1 We review and update this privacy policy from time to time. We recommend that you review the terms of this policy periodically to make sure that you are aware of how we collect, hold, store and use personal information. The date this policy was last updated will be set out at the start of this policy as well as in the footnote.

## 9. Accessing, updating and correcting your information

- 9.1 You can view your information, including your transaction history in the Beem app or Beem web wallet.
- 9.2 If your details in the Beem app or Beem web wallet are not correct, and you are not able to update it yourself, you can contact our Privacy Officer by emailing [privacy@auspayplus.com.au](mailto:privacy@auspayplus.com.au).

## 10. Making a privacy complaint

- 10.1 If you consider a breach of the Privacy Act (including the Australian Privacy Principles) has occurred, you may direct your query to our Privacy Officer using the details set out in the contacting us section below and we will attempt to resolve your complaint. If you make a complaint to us, we will:
  - 10.1.1 Keep a record of your complaint;
  - 10.1.2 Give you a reference number and a staff member's name and contact details so you can follow up with them if needed;
  - 10.1.3 Respond to the complaint within 21 days or tell you if we need more time to complete our investigation;
  - 10.1.4 Give our final response within 45 days; and
  - 10.1.5 If we cannot complete our investigation within 45 days, we will let you know why.
- 10.2 If you do not consider our response satisfactory, you may contact the Australian Privacy Commissioner (**APC**) at its website [www.oaic.gov.au](http://www.oaic.gov.au) or by telephone on 1300 363 992. The APC also has a mailing address at GPO Box 5218, Sydney NSW 2001.
- 10.3 You may also lodge a complaint with the Australian Financial Complaints Authority (**AFCA**). AFCA is a free and independent dispute resolution service. AFCA also has a mailing address at GPO Box 3, Melbourne 3001.

## 11. Contact Details

- 11.1 If you have any questions about this privacy policy and would like further information, please contact us [privacy@auspayplus.com.au](mailto:privacy@auspayplus.com.au).