

# PRIVACY POLICY

version 1.1

In this Privacy Policy “**we**”, “**us**”, “**our**” or “**Waave**” means Waave Technologies Pty Ltd (ABN 60 642 784 030). Waave offers a new way to pay.

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us when providing our website, mobile application and/or payment services to you (together, our “**Services**”).

## The information we collect

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

During the registration stage for the beta version of our mobile application, the types of personal information we may collect about you include:

- your full name;
- your interest in the beta version of our mobile application;
- your email address;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our online Services, including through the use of Internet cookies, your communications with our online Services, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider; and
- any other personal information requested by us and/or provided by you or a third party.

When you sign-up for and use our Waave product, the types of personal information we may collect about you include:

- your full name;
- your contact details, including address, email and mobile phone number;
- your date of birth;
- details of bank account(s) you link with Waave including BSB, account number, name, balance and type;
- full transaction history for linked bank accounts (including incoming and outgoing transactions, who the transactions are from or to, the dates of the transactions, descriptions of the transactions and the amounts of the transactions);
- your Waave transaction history (including incoming and outgoing transactions, who the transactions are from or to, the dates of the transactions, descriptions of the transactions and the amounts of the transactions);
- any authorisations you provide in connection with making a payment via Waave;
- your driver’s licence and/or passport and/or Medicare details where required for Know Your Customer purposes;
- information you provide to us, including through any feedback mechanism such as customer surveys;

- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our online Services, including through the use of Internet cookies, your communications with our online Services, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.

**Sensitive information:** is a sub-set of personal information that is given a higher level of protection. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.

We do not actively request sensitive information about you. If at any time we need to collect sensitive information about you, unless otherwise permitted by law, we will first obtain your consent and we will only use it as required or authorised by law.

## How we collect personal information

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

- **Directly:** We collect personal information which you directly provide to us, including when you register for an account on our mobile application, when you provide a consent, authorisation or verify your identity in connection with our Services or when you contact us or request our support in connection with our Services.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website or mobile application, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such as details of your use of our online Services from our analytics and cookie providers and marketing providers. See the “Cookies” section below for more detail on the use of cookies.

## Collection and use of personal information

We may collect, hold, use and disclose personal information for the following purposes:

- to provide our Services to you, including to:
  - enable you to access and use our online Services, including to provide you with an account for our mobile application;
  - facilitate payments on your behalf by providing your payment instructions to your bank account provider(s);
  - provide support for our Services;
- to verify your identity for Know Your Customer purposes;
- to contact and communicate with you about our Services;
- for our internal record keeping, administrative, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our Services and any associated applications;

- to run promotions, competitions and/or offer additional benefits to you;
- for advertising and marketing, including to send you promotional information about our products and services and information that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have;
- if you have applied for employment with us; to consider your employment application; and
- if otherwise required or authorised by law.

## Disclosure of personal information to third parties

We may disclose personal information to:

- our third party Know Your Customer verification provider;
- our third party payment processor for the facilitation of direct debit requests;
- other third party service providers for the purpose of enabling them to provide their services to us, including (without limitation) IT service providers, data storage, web-hosting and server providers, maintenance or problem-solving providers, marketing or advertising providers and professional advisors;
- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- sponsors or promoters of any promotions or competition we run;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights, including in the event you fail to pay for products or services we have provided to you;
- third parties to collect and process data; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

**Overseas disclosure:** We store personal information in Australia and we typically require that third parties also store personal information in Australia. However, where we disclose your personal information to third parties listed above, sometimes these third parties may store, transfer or access personal information outside of Australia. We will only disclose your personal information to countries with laws which protect your personal information in a way which is substantially similar to the Australian Privacy Principles or we will take such steps as are reasonable in the circumstances to protect your personal information in accordance with the Australian Privacy Principles.

## Your rights and controlling your personal information

**Your choice:** Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Restrict and unsubscribe:** To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

**Access:** You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information.

**Correction:** If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information.

**Complaints:** If you wish to make a complaint about our handling of personal information, please contact us using the details below and provide us with your name, your contact details, your preferred contact method and full details of your complaint. We will aim to send an acknowledgement of your complaint within 5 business days of receiving your complaint.

We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. If you are unhappy with our response, you have the right to contact the Office of the Australian Information Commissioner.

### **Storage and security**

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

### **Cookies**

We may use cookies on our online Services from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, if and when you choose to provide our online Services with personal information, this information may be linked to the data stored in the cookie. For example, we may use cookies which recognise you as a returning customer so that we can personalise our content for you and remember your preferences, as well as analytical cookies that allow us to recognise and count the number of visitors to our online Services and to see how visitors move around our online Services, and cookies which allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our online Services.

### **Links to other websites**

Our Services may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

## **Amendments**

We may, at any time and at our discretion, update this Privacy Policy by publishing the updated Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy. You can also always ask us to provide a copy electronically or in hard copy.

**For any questions or notices, please contact our Privacy Officer at:**

Waave Technologies Pty Ltd ABN 60 642 784 030

Address: PO Box 789 Rose Bay NSW Australia 2029

Email: [complaints@waave.com](mailto:complaints@waave.com)

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