

# Privacy Policy

Effective date: 01 March 2023

This website (“Website”) is operated by Mastercard Prepaid Management Services Australia Pty Ltd (ABN 47 145 452 044, AFSL 386837), an indirect fully-owned subsidiary of Mastercard International Incorporated, on behalf of itself and its holding companies, subsidiaries and affiliates (together, “Mastercard”, “we”, “us” or “our”).

## 1. Introduction

We respect the confidentiality and privacy of the consumers that visit our site. This Privacy Policy describes what personal information we collect, how we use the information we collect, with whom we share it, and the choices you can make about our use of the information we collect. We also describe how you can inquire about our privacy practices. We urge you to read our Privacy Policy carefully.

## 2. Information we collect

We may obtain information about you from various sources. For example, we may have a direct relationship with you and obtain information about you directly when you choose to provide personal information to us. We may also obtain information about you in our role as a prepaid program manager. As a prepaid program manager and provider of related services, we may process payment card transactions on behalf of your financial institution and/or distribute prepaid cards to you through our distributor network. In connection with offering these services, we may obtain personal information about you from financial institutions, distributors and other service providers. In addition, you may choose to submit information directly to us. You may do so, for example, on our websites, in connection with ordering or using a prepaid product or service, when you participate in an offer or promotion or in connection with an actual or potential business or employment relationship with us. The types of personal information we may obtain include:

- Contact information (such as name, postal or e-mail address, and telephone or fax number);
- Government identification (such as driver’s licence or passport information);
- Business contact information (such as job title, department and name of organisation);
- Username and password;
- Payment card information;
- Financial information (such as financial account information and information that may be contained in a consumer report);
- Identification number or access code;
- Content you provide (such as photographs, articles and comments);
- Geo-location data; and
- Other information (such as shopping behaviour and preferences, language preference, age, date of birth, gender and family status). The personal information that we collect depends on the products and services that are being provided or requested. If you do not provide us with the information asked, we may not be able to provide the products or services you have requested.

### 3. How we collect personal information from you

Mastercard collects personal information in a number of ways, including:

- directly from you, such as when you provide the information in an application form, by telephone, email or other internet communications, or when you submit your personal details to participate in competitions and promotions;
- from third parties, such as credit reporting agencies;
- from our business partners that sell you Mastercard products or services;
- from Heritage and People's Choice Limited trading as Heritage Bank (ABN 11 087 651 125, AFSL No. 244310 - the issuer of the Multi-Currency Cash Passport, Cash Passport Platinum, Gift Card, Everyday Card and Travel Platinum Card); or
- from publicly available sources of information, such as telephone directories and websites.

### 4. How we use the information we collect

We may use the information we obtain about you for any one or more of the following purposes:

- to process your prepaid card transactions (including authorisation, clearing, settlement, chargebacks and other related dispute resolution activities);
- to protect against and prevent fraud, unauthorised transactions, claims and other liabilities, and manage risk exposure and franchise quality;
- to create and manage your online account and respond to your enquiries, including confirming your identity as required by applicable law;
- to conduct credit checks and to obtain ongoing credit information;
- to manage our prepaid card inventory;
- to provide, administer and communicate with you about Multi-Currency Cash Passport, Cash Passport Platinum, Gift Card, Everyday Card, Travel Platinum Card and similar products, services and promotions (including contests, sweepstakes, programs and other offers), including by way of direct mail and telemarketing (unless you tell us otherwise);
- to send you market commentaries, newsletters or similar materials (which you may advise us that you do not wish to receive);
- to conduct client surveys in order to improve the ways in which we provide you with products and services;
- to operate, evaluate and improve our business (including developing new products and services, managing our communications, determining the effectiveness of our advertising, analysing our products, services and websites, performing and producing data reports and analysis that have been anonymised to ensure that they do not identify you as an individual, facilitating the functionality of our websites and performing accounting, auditing, billing, reconciliation and collection activities);
- to enforce our terms and conditions;
- to comply with applicable legal requirements, industry standards and our policies;
- to consider you for employment role or contact you in the course of a recruitment process;
- to respond to queries, complaints or to provide you with our general customer service;
- to comply with requests made by a court or governmental or other public authority, for example, in connection with legal proceedings or the prevention or detection of fraud and crime;
- to comply with Mastercard's risk management policies and procedures, including our security procedures; and
- to train our staff.

We may use your personal information for additional purposes related to the purposes listed above and will provide specific notice at the time of collection. We will not, however, use your personal information other than for:

- a purpose made known to you;
- a purpose you would reasonably expect;
- a purpose required or permitted by law; or
- a purpose otherwise authorised by you.

## **5. Disclosure of information**

We do not sell or otherwise disclose personal information we collect about you, except as described herein or otherwise disclosed to you at the time the data is collected. We share information to fulfill our role as a prepaid program manager, including perform payment card transactions and other activities that you request. We may share the personal information we collect with our affiliates, financial institutions that issue payment cards or process payment card transactions, entities that assist with payment card fraud prevention, and distributors. For example, in this context we provide financial institutions with information about their cardholders' transactions that we process. We may share your personal information with credit reference agencies and fraud prevention agencies to (i) make enquiries when you ask for a Multi-Currency Cash Passport, Cash Passport Platinum, Gift Card, Everyday Card, Travel Platinum Card or any of our products or services or to assist us in managing the Multi-Currency Cash Passport, Cash Passport Platinum, Gift Card, Everyday Card, Travel Platinum Card or other products and services; (ii) share information about you and how you manage the Multi-Currency Cash Passport, Cash Passport Platinum, Gift Card, Everyday Card, Travel Platinum Card or other product or service; (iii) if you give us false or inaccurate information or we suspect fraud. These agencies keep a record of our enquiries (whether or not you proceed with your application, and whether or not your application is successful) and may record, use and give out information we give them to lenders, insurers and other organisations to make assessments on you and members of your household, and to assist with identity verification, for debt tracing and to prevent fraud and money laundering.

We also may share the information with our service providers who perform services on our behalf. We do not authorise these service providers to use or disclose the information except as necessary to perform certain services on our behalf or comply with legal requirements. For example, your personal information will not be provided to any third party for their own marketing purposes unless you have provided your express consent to such activities. We require these service providers by contract to appropriately safeguard the privacy and security of personal information they process on our behalf. We also may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We also reserve the right to transfer personal information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information you have provided to us in a manner that is consistent with our Privacy Policy. Following such a sale or transfer, you may contact the entity to which we transferred your personal information with any enquiries concerning the processing of that information.

## **6. Data transfers**

We may disclose your personal information to overseas recipients including in the United Kingdom and United States of America for the purposes set out above. Such recipients may include affiliates of Mastercard including other companies of the Mastercard group as well as partners and service providers. When personal information is disclosed to such recipients, we will ensure that the information will be protected by a law, contract or other mechanism which upholds privacy principles and requirements similar to those under the Australian Privacy Act 1988 (Cth), as amended from time to time, and the Australian Privacy Principles ("APPs") or similar principles, as applicable. We will take such steps as are reasonable in the circumstances to ensure the overseas recipient does not breach the APPs. Also, by applying for and activating your Multi-Currency Cash Passport, Cash Passport Platinum, Gift Card, Everyday Card or Travel Platinum Card you consent to Mastercard disclosing your personal information to overseas recipients as described above.

## **7. How we protect personal information**

We maintain appropriate administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. We use SSL encryption on a number of our websites from which we transfer certain personal information.

## **8. Keeping your personal information accurate**

We take reasonable steps to maintain the accuracy of your personal information for as long as it is being used by us for the purposes set out in this Privacy Policy, and you play an active role in keeping us up to date. Prompt notification of any changes, for example to your postal or email address or telephone number, will help us provide you with the best possible service. Should you discover, upon review of your personal information, that amendments are required, please advise us. We will use our best efforts to advise others of any important amendments to your personal information which we may have disclosed to them.

## **9. Retention**

We only keep your personal information for as long as and to the extent that we need it to reasonably meet the purposes set out in this Privacy Policy. The length of time we retain your personal information is also affected by: (i) the type of product or service you have with us; (ii) any legal requirements we are subject to with respect to your personal information; and (iii) any consent given by you to retain such personal information.

## **10. Your rights and choices**

You may have certain rights regarding the personal information we maintain about you. We offer you certain choices about what personal information we collect from you, how we use that information, and how we communicate with you. You may choose not to provide personal information to us by refraining from conducting a transaction using one of our prepaid cards. You also may refrain from submitting information directly to us. You may withdraw any consent you previously provided to us, or object at any time on legitimate grounds, to the processing of your personal information. We will apply your preferences going forward. In some circumstances, withdrawing your consent to our use or disclosure of your personal information will mean that you cannot take advantage of certain of our products or services. You may direct us not to share your personal information with third parties, except (i) with service providers we have retained to perform services on our behalf, (ii) in the event we sell or transfer all or a portion of our business or assets, (iii) if disclosure is required by law or legal process, (iv) with law enforcement authorities or other government officials, or (v) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraud or other illegal activity. As a matter of law and good practice we will use your personal information only for the purposes indicated in this policy unless we have a legal basis, such as consent, to use it for other purposes. Where required by law, we obtain your prior opt-in consent at the time of collection for the processing of (i) personal information for marketing purposes and (ii) personal information deemed sensitive pursuant to applicable law.

You may request: (i) access to and receive the personal information we maintain about you, or (ii) the updating and correction of inaccuracies in your personal information, and have the information blocked or deleted, as appropriate. The right to access personal information may be limited in some circumstances by legal requirements. Subject to the limited circumstances set out below, we will endeavor to process your request within 30 days of receiving your request. In order for us to process your request, we will need to verify your identity and, in some circumstances, we may need to charge an administrative fee, which will be advised in advance. In the event that we refuse you access to your personal information, we will provide you with an explanation for that refusal. These reasons may include:

- an unreasonable impact on the privacy of other individuals;
- the information relates to legal proceedings relating to you;
- the information would reveal our commercially-sensitive decision-making process; or
- we are prevented by law from disclosing the information or providing access. To update your preferences, ask us to remove your information from our mailing lists or submit a request, please contact us as specified below.

## **11. How a privacy complaint may be made**

If you wish to complain about any breach or potential breach of this Privacy Policy or the APPs, please contact us via the contact details below and we will make every effort to resolve your complaint internally. If we do not resolve the complaint to your satisfaction, you may apply to the Federal Privacy Commissioner to have your complaint investigated. For more information on how you may lodge a complaint with the Federal Privacy Commissioner, please contact the Commissioner's hotline service on 1300 363 992.

## **12. Changes to the Privacy Policy**

Any changes we make to our Privacy Policy in the future will be posted on this page. Please do check our Privacy Policy from time to time to take notice of any changes made. By using the Website and/or any service offered on the Website or by placing orders after we have changed these terms, you will be accepting these changes.

## **13. Use of cookies**

We may collect activity information on this Website through the use of cookies. A cookie is a small text file placed on your computer hard drive by a webpage server which can then be accessed by our web servers. You may configure the web browser to not accept the cookies, however this may mean that you would not be able to make full use of our Website. We use cookies to ascertain information such as the number of users who visit our Website, the date and time of visits and the pages viewed. The cookies on their own do not identify an individual but they provide us with statistics to analyse and improve our Website.

## **14. Contact us**

If, at any time, you have questions, concerns or comments about this Privacy Policy or our privacy practices, please contact us at the following addresses:

**Mail:** Mastercard Prepaid Management Services Australia Pty Ltd  
72 Christie Street, St Leonards NSW 2065  
Attention: The Privacy Officer.

**Email:** prepaidmgmt\_globalcomplaints@mastercard.com