



Privacy Policy

1. INTRODUCTION

Your privacy and security is our absolute priority. This policy explains what kind of data may be shared with us as well as how we collect, store, use and disclose that data. By using any of our websites, services or apps detailed below, you agree to the collection and use of information in accordance with this policy.

2. ABOUT US

Satisfy Holdings Australia Pty Ltd ABN 31 632 974 880 ('us, we, or the Company') operates the websites www.satisfy.app, www.satisfy.work, www.satisfy.business, www.satisfy.support, ('the websites, our websites') and provides a platform 'service' called Satisfy ('the app') where users can send money ('tips') from their VISA, MasterCard or American Express to verified employees of Australian businesses.

3. YOUR PRIVACY IS OUR PRIORITY

- a. We have adopted an approach that is consistent with the Privacy Act, the Australian Privacy Principles (APPs) and the APP guidelines.
- b. We protect your information and aim to be open and clear about what we do with it, so you can make well informed decisions about how you share your data with us.
- c. If you decide to share any personally identifiable information with us, we appreciate your trust in us and respect your privacy.

4. WHAT INFORMATION WE COLLECT

- a. We may collect 'personal information' including but not limited to your name, address, email address, mobile number, bank account details, and tax file number.
- b. We may collect 'employment information' at your discretion relating to your employment at a verified Australian business including but not limited to the nature of work, your role, and employment status.
- c. If you register as a business, we may also collect 'business information' relating to your business including but not limited to the business ABN, business trading name, the type or nature of business, and business contact information including email address, physical address and contact phone number.
- d. 'Log data' may be information including but not limited to your computer's IP address, browser type, browser version, the pages of service that you visit, the time and date of your visit, the time spent on those pages and other usage statistics. When accessed via a mobile device, this log data may be information including but not limited to the type of device in use, your mobile device unique ID, the IP address of your mobile device, the mobile operating system, the type of mobile internet browser in use and other statistics.
- e. Location information.

5. WHERE YOUR INFORMATION IS COLLECTED

- a. You have the option to share your personal information described in 4.1 while using our sites or app so you can access our services.
- b. Any of your employment information will be collected from you within the app or may be shared by your employer when inviting you to use the app.
- c. Any business information you choose to share with us will be in a secure online portal accessed by clicking either Sign Up or Log In at www.satisfy.business.
- d. The Log data detailed in Section 3.3 may be shared with us at any time using any of our sites or app according to the settings of your device, or browser when you use any of our websites.
- e. You may be asked while using the app to enable location services. You can enable or disable location services when you use the app at anytime, through your mobile device settings.

6. HOW WE USE YOUR INFORMATION

6.1 We use your personal information:

- a. To verify your contact details.
- b. To manage our relationship with you.
- c. To facilitate the relationship between you and anyone you choose to interact with on the app.
- d. To minimise risks and identify or investigate fraud and other illegal activities.
- e. To improve our service to you, and your experience with us.
- f. To comply with privacy laws.
- g. To improve and manage our business, products and services.

6.2 We use your employment information:

- a. To verify your employment at a verified Australian business.
- b. To provide our service to you.
- c. To facilitate the relationship between you and any user who wants to tip you.
- d. To minimise risks and identify or investigate fraud and other illegal activities.
- e. To improve our service to you, and your experience with us.
- f. To comply with privacy laws.
- g. To improve and manage our business, products and services.

6.3 We use your business information:

- a. To verify the business you own, or manage, as a registered Australian business.
- b. To provide our service to you.
- c. To facilitate the relationship between app users, your business, and the verified employees of your business.
- d. To improve our service to you, and your experience with us.
- e. To comply with privacy laws.
- f. To improve and manage our business, products and services.

6.4:

We may also collect, use and exchange your information for other reasons where the law allows us or require us.

6.5:

In addition, we may use third-party services, such as Google Analytics & Hubspot, that collect, monitor and analyse this type of information in order to increase our Service's functionality. These third-parties may use cookies to help us analyse how our users are using the Service and they have their own Privacy Policies addressing how they use such information.

7. OUR INTERACTION WITH YOU

7.1

We may use your information to contact you, to give you advice on how to make the most out of the Satisfy platform, and to tell you about products and services we think you might be interested in using, or interested in sharing with others.

7.2 We may contact you by:

- a. Email
- b. Phone
- c. SMS
- d. Social Media
- e. Within the App
- f. Live Chat on our Websites

7.3

You may opt out of any direct marketing messages by contacting team@satisfy.support.

8. SHARING YOUR INFORMATION

8.1

We may also share your information with third parties for the reasons in Section 5 or where the law otherwise allows. These third parties can include:

- a. Our Service Providers - for example, direct marketing and communication agencies, identification verification agencies;
- b. Government and law enforcement agencies and regulators; and
- c. Organisations that help identify illegal activities and prevent fraud.

8.2

Sometimes we may send your information overseas, including to:

- a. Service providers or third parties who store data or operate outside Australia; and
- b. Comply with laws and provide assistance to law enforcement or government agencies.

8.3

Where your information is sent overseas, it is likely to be the USA. If we send your information overseas, we make sure that there are appropriate arrangements in place to protect your information.

9. KEEPING YOUR INFORMATION SAFE

9.1

We aim only to keep your information as long as we need it.

9.2

Here are some of the ways we ensure the handling of your data is secure and protected at all times:

- a. We only use reputable and trusted third parties to store and manage your personal, work, business and log data.
- b. Your privacy and security is our priority, and we train our staff to act in accordance with this policy at all times.

- c. When you login to our websites or app, we encrypt data sent from your computer/device to our systems so that no-one else can access it. When we send your electronic data to other organisations, we use secure networks or encryption. We use passwords to stop unauthorised parties gaining access to your information.
- d. We aim to keep personal information for only as long as we need it for business or legal reasons. When we no longer need your information, we take reasonable steps to destroy or de-identify it.

9.3

While we are committed to your privacy and security, please be aware that there is no method of transmission over the internet, or method of electronic storage that is 100% secure and we are unable to guarantee the absolute security of any of the information we have collected from you.

10. ACCESSING, UPDATING OR CORRECTING YOUR INFORMATION

- a. You can view your information, including transaction history in the Satisfy app.
- b. If your details in the app are not correct, and you are not able to update it yourself, you can contact us at team@satisfy.support to edit and modify your details.

11. MAKING A PRIVACY COMPLAINT

11.1

This is not something we expect to be required, however, if in the unlikely situation that something goes wrong, it is our priority to resolve it.

11.2

If you wish to lodge a complaint or discuss with us any of your concerns about the collection, storage and use of your personal, employment, business or log data, please contact us at team@satisfy.support.

11.3 We will:

- a. Keep a record of your complaint/concern
- b. Give you a support ticket reference, as well as a staff member's name and contact details so you can follow up with them if needed
- c. Respond to the complaint within 21 days, or tell you if we need more time to complete our investigation or resolution;
- d. Give our final response within 45 days; and
- e. If we cannot complete our investigation within 45 days, we will let you know why.

11.4

If you are not happy with how we handled your complaint, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA is a free and independent dispute resolution service.

12. OTHER IMPORTANT INFORMATION

12.1 Google Analytics

Google Analytics service is provided by Google Inc. You can opt-out from Google Analytics service from using your information by installing the Google Analytics Opt-out Browser tool: <https://tools.google.com/dlpage/gaoptout>. For more information on the privacy practices of Google, please visit the Google Privacy web page: <http://www.google.com/policies/privacy/>

12.2 Cookies

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and transferred to your device. We use cookies to collect information in order to improve our services for you. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The Help feature on most browsers provide information on how to accept cookies, disable cookies or to notify you when receiving a new cookie. If you do not accept cookies, you may not be able to use some features of our Service and we recommend that you leave them turned on.

12.3 Do Not Track Disclosure

We support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

12.4 Business Transaction

If Satisfy is involved in a merger, acquisition or asset sale, your Personal Information may be transferred as a business asset. In such cases, we will provide notice before your Personal Information is transferred and/or becomes subject to a different Privacy Policy.

12.5 External Sites or Services

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third-party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

12.6 Children's Privacy

Only persons age 16 or older have permission to access our Service. Our Service does not address anyone under the age of 16 ('children'). We do not knowingly collect personally identifiable information from children under 16. If you are a parent or guardian and you learn that your child or children have provided us with Personal Information, please contact us. If we become aware that we have collected any personal or other information from a child or children under age 16 without verification of parental consent, we will take prompt steps to remove that information from our servers.

12.7 Changes to this Privacy Policy

This Privacy Policy is effective as of the date shown on the Front Page of this document and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page. We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, be assured that we will notify you either through the email address you have provided us, via a push notification within the app, or by placing a prominent notice on our website.

13. CONTACT

Contact Satisfy

You can ask us any question, provide feedback, or lodge a complaint by visiting www.satisfy.support or emailing us at team@satisfy.support.

Contact Australian Financial Complaints Authority

AFCA
GPO Box 3 Melbourne VIC 3001
Phone: 1800 931 678 (free to call)
Web: www.afca.org.au

Contact the Privacy Commissioner

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Web: www.oaic.gov.au