

# PRIVACY POLICY - EXTENDED

## About this Policy

Our Quest Payment Systems Pty Ltd (Quest) Privacy Policy outlines:

- How and why we collect your personal information;
- How your personal information is used and protected;
- When and with whom we share your personal information; and
- What choices you can make about how we collect, use and share your information.

## What to read first

The best place to start is by reading the Privacy Policy Highlights which can be found [here](#). It is a great way to get an understanding of how we collect, use, disclose and store your personal information. This full Privacy Policy will give you a more comprehensive explanation of how your data is handled by us. If there's anything that is not clear from this privacy policy, please feel free to email us at [info@questps.com.au](mailto:info@questps.com.au).

## Our commitment to protect your privacy

At Quest, we are committed to protecting your privacy. To ensure that you can make informed decisions and feel confident about supplying your personal information to us, this policy outlines our practices and the choices that you have concerning how your personal information is collected and used by us.

We have a simple approach to data protection and privacy which adheres to the 13 Australian Privacy Principles and the requirements of the *Privacy Act 1988 (Cth.) (Privacy Act)*.

## Personal information

Personal information is information that may identify you or by which your identity may be reasonably determined. In this privacy policy, 'personal information' has the same meaning as defined by section 6 of the Privacy Act.

We request information from you in several areas of our website, application forms and other channels that may be used to identify you. This personal information includes but is not limited to:

- Your name, gender, date of birth, passport or other personally identifiable number and information;
- Your contact information such as your telephone numbers, mailing addresses, email addresses, and fax numbers;
- Your credit or debit card information and billing information, including name of cardholder, card number, billing address and expiry date;
- Your business information such as company name, business title and associated contact information.

Over the course of our relationship with you, we may collect and hold additional personal information about you, including transactional information, account or policy information, or records of complaints or enquiries about your product or service.

Sometimes we need to collect sensitive information about you. Sensitive information includes information about your health, membership of professional or trade associations or a criminal record. Unless required by law, we will only collect sensitive information with your consent.

## Collection of Personal Information

We collect your personal information so that we can provide you with the products and services that we supply. Some of the various ways that we collect your personal information are outlined below.

### User contact forms

When you fill out a contact form wishing to get in touch with us, we will collect that information and use it to get in touch with you in response to your query. We may use the information to reach out to you to inform you of some of the services we provide, provided it is in line with your original query.

### Product or service applications

When you sign up or apply for a Quest product or service using your personal or company details, we will collect personal information to provide the Quest services to you. If you have applied for a product then this information will be used to process your application and where appropriate to debit and credit your nominated bank accounts.

Quest are required to collect some personal information prior to or as part of the provision of a specific service. If you fail to supply such personal information, we may be unable to deliver you the services in full.

## **Contacting Support**

If you contact us for any technical, product or other application or website related support, we will retain that information on record so as to process your request, as well as for training purposes. Such information includes the transcript, emails or other information which was relayed by you throughout the support request process.

## **Website and app cookies and analytics, including location-based services (geolocation)**

Quest's website and some applications use cookies and other digital identifiers that fall into the following 3 types:

### **- Site performance indicators**

These give us information on how our websites are used, so that we can make the necessary improvements or amendments to make your experience a better one.

### **- Analytics Cookies**

These give us the statistics to understand how many people are on our website, which areas of the site are popular and where we need to improve.

### **- App Analytics**

These give us the statistics to understand how people are using our apps, which components of the apps are useful and where we need to improve.

You can always disable the use of cookies by changing the security settings of your browser. However, please bear in mind that this will affect how some items are displayed on our website.

Some Quest websites and applications collect, use and share your location data so as to provide you with location-based services. Please be aware that your location data will only be tracked through an opt-in process whereby most browsers and devices will notify you. No location data will be collected without your authorisation being provided.

### **- Through third parties**

From time to time, we will also collect information that pertains to you indirectly from a third party or from a publicly available source. However, we only do this where you have consented to your information being collected in this way, or would reasonably expect us to collect it in this way. When we do so, we ask the third party to confirm that the information was legally acquired by the third party and that we have the right to obtain it from them and use it.

## **Use of Personal Information**

We only use personal information for the purpose which was requested of us, or for the purposes which directly relate to one of our functions or activities. These purposes include, but are not limited to:

### **- Assessing your application for use of our products or services**

If you submit an application for the use of a Quest product or service, we will use the information you have provided to assess the application and conduct necessary eligibility checks, including to verify your identity. To help us do this, we share your information with others, for example, third party vendors who provide identity verification services.

### **- Fulfilling your request to utilise our products or services**

If you request the use of a Quest product or service, we will use the information you provide us to fulfil your request. To help us do this, we share information with others, for example, financial institutions, business partners or courier companies.

### **- Personalising your experience on our website or apps**

We may use information we collect about you to provide you with a personalised experience on our websites or apps, such as providing you with additional content that might interest you.

### **- Providing support through our website or Support Team**

We use your personal information to support products or services you have obtained from us, such as notifying you of a product update. We may make call recordings or keep copies of these interactions for staff training or quality assurance purposes, or to retain evidence of a particular transaction or interaction.

### **- Marketing**

We may use your personal information to send you advertising that directly relates to Quest payment products. All direct marketing correspondence that you receive from us via email has an unsubscribe button or link located at the bottom of the email. With this, you can manage which messages you receive from us.

## - Recruitment

We use personal information provided to us in connection with a job application or inquiry in order to consider you for employment purposes. Unless you tell us not to do so, we keep the information for future consideration.

## Disclosure of Personal information

We will not sell or rent your personal information.

We will share your personal information to a third party in limited circumstances, such as:

- you have consented;
- as necessary to complete any transaction or provide any product you have requested or authorised;
- you would reasonably expect, or have been informed, that information of such kind would be passed on to those individuals, entities or bodies;
- it is otherwise required or authorised by law.

Third parties may include:

- those involved in providing, managing or administering your product or service, including service providers and business partners;
- other financial institutions and debt collection agencies;
- financiers, insurers, auditors and contractors that Quest engage with to offer products and services;
- credit reporting bodies or other approved third parties who are authorised to assess the validity of identification information;
- data storage providers; or
- government or regulatory bodies (including the Australian Securities and Investment Commission and the Australian Tax Office) as required or authorised by law.

## Disclosure of Personal Information outside of Australia

Some of your personal information may be stored with or disclosed to other entities overseas (who are not in Australia or an external Territory) who are direct partners that assist us in providing our service. These entities are currently located in the United States of America and China (the latter for our customers using Alipay facilities only).

We have taken steps to ensure that the overseas recipient does not breach the Australian Privacy Principles. We also have in place policies and procedures to safeguard the handling of your personal data by such entities.

Quest hosts its data either in-house or with [Amazon Web Services](#) in Australia as well as within the United States of America within Google's Cloud Platform. You can read more about Google's Cloud security [here](#).

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

## Data security and retention

We store information in different ways, including in paper and electronic form. We take active steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure, and against other misuse. We use reasonable security measures, including physical, administrative, and technical safeguards to protect your personal information.

We are required to retain some personal information for certain periods of time under law, such as, for example, the Corporations Act, the Anti-Money Laundering & Counter-Terrorism Financing Act, and the Financial Transaction Reports Act. For example, if you utilise our merchant acquiring services, we will keep some personal information relating to your account for a period of seven years after your relationship with us has ended.

When the personal information that we collect is no longer required by law, your personal information is destroyed in a secure manner or de-identified so that it no longer can be used to identify you.

## Data Breach

We report all eligible data breaches via the Notifiable Data Breach Scheme. An eligible data breach is one in which the impacted individual/s is likely to experience serious harm.

In the event that Quest has confirmed that an eligible data breach has occurred, Quest will take the following actions:

- contain and assess the breach;
- notify individuals that have been impacted; and
- notify the Commissioner that a breach has occurred and the steps being taken to rectify the breach.

## Access and Correction

You can access the personal information that we hold about you by contacting us at [info@questps.com.au](mailto:info@questps.com.au), or as per the contact details in the 'How to Contact Us' section.

At Quest, we do everything we can to keep your personal information up to date and accurate, as this allows us to deliver a better service to you. However, if you find that any information we hold about you is incorrect, you can also contact us and we will correct the information held by us.

Under Australian privacy laws, there may be situations where we cannot provide access to such personal information. For instance, if it would reasonably affect someone else's privacy or may pose a threat to someone's life, health or safety.

### Complaints Handling

If you have any complaints or feel that there has been a breach of the Australian Privacy Principles, please let us know at [info@questps.com.au](mailto:info@questps.com.au) or via another contact option in the 'How to Contact Us' section. We are committed to resolving your complaints quickly.

If you still feel your issue hasn't been resolved to your satisfaction, then you can escalate your privacy concern to the Office of the Australian Information Commissioner on the details below:

Online: [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)

**Mail:** GPO Box 5218 Sydney NSW 2001

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Telephone:** 1300 363 992

## How to Contact Us

We understand that your personal information is important to you and are here to help you with any questions or comments that you may have about this policy or our practices.

You can get in touch with us in the following ways:

**Email:** [info@questps.com.au](mailto:info@questps.com.au)

**Mail:** Quest Payment Systems Pty Ltd, 227 Burwood Rd, Hawthorn, VIC, 3122

**Telephone:** +61 3 8807 4400

If you would like to contact us with a general enquiry, you can choose to do this anonymously or use a pseudonym. We might not always be able to interact with you this way, however, as we are often governed by strict regulations that require us to know who we are dealing with

## Changes to this Privacy Policy

We encourage you to periodically review our Privacy Policy on our website for any changes as it may change from time to time.

Both the Privacy Policy Highlights and this Privacy Policy were last updated in April 2018. The previous version of this Privacy Policy is available here.