



Document Purpose

The purpose of this Privacy Policy is to provide a summary of how, why and when personal information is collected, disclosed, used, stored and otherwise handled by Tyro Payments Limited (Tyro). The Policy relates to personal information collected by any means and by any technology. Tyro treats the handling of personal information very seriously. To that end, Tyro has systems and procedures in place to protect privacy in relation to the handling of personal information. Tyro abides by the Australian Privacy Principles and its objective is to handle information responsibly. The Privacy Act provides for an exemption in relation to employee records (being records relating to a current or former employment relationship between Tyro and the individual). Tyro is not required to comply with the Australian Privacy Principles when dealing with employee records.

Collection of Personal Information

Tyro collects and holds the following types of personal information:

- Personal information is information or opinion from which an individual's identity may be ascertained either by itself or if combined with other information. The nature of personal information collected by Tyro generally comprises the name and contact details (including address, phone, fax and e-mail) of an individual or company.
- Financial information is credit card, debit card and EFTPOS card transaction information that has been processed by Tyro and recorded via Tyro's online reporting system and includes without limitation volume of transactions, chargebacks and transaction value information.

Personal information is collected for the primary purpose of performing services in accordance with Tyro's business activities. Tyro does not collect personal information unless it is necessary to perform one or more of its functions and activities and will destroy personal information when it is no longer required for such functions and activities.

If you do not provide the personal information requested by Tyro, Tyro may not be able to provide you with your requested products or services.

Purposes for collection

Tyro collects, holds, uses and disclosed personal information for the following purposes:

- to provide credit, debit and EFTPOS card acquiring services and products;
- to provide further information about the services and products we provide;
- to resolve complaints;
- process payments;
- direct marketing;
- to provide support services; and
- any other purpose related to any of the above.

Use and Disclosure of Personal Information

Tyro will use and disclose personal information for the purpose for which the personal information was initially collected. Tyro may also use personal information for a purpose related to the initial purpose of collection if that other purpose would be within the provider's reasonable expectations. Related purposes might include internal auditing and administration or adding a name to a contact list, guest list or invitation list. Tyro will not use or disclose the personal information of an individual or company for any purpose other than the primary purpose for which the information was collected without first obtaining express or implied consent. Personal information provided to Tyro may be shared with related companies if this is necessary for Tyro to carry out its business where it will be kept strictly confidential and will only be disclosed on a need to know basis. This may involve direct marketing. If it does, the individual will be provided with an opportunity to opt out of receiving direct marketing from Tyro. Tyro may however be required to disclose personal information without consent if the disclosure is:

- required or authorised by law;
- required in order to investigate an unlawful activity;
- required by an enforcement body for investigative activities; or
- necessary to prevent a serious threat to a person's life, health or safety, or to public health or safety.

Generally, Tyro will retain personal information within Australia and not use or disclose it overseas. On some occasions personal information may need to be transferred overseas in order to perform one of Tyro's functions or activities. In these circumstances, Tyro will either obtain express or implied consent or will use its best endeavours to ensure that personal information will receive protection similar to that which it would have if the information were in Australia.

Tyro may disclose personal information to an Australian-based office of a third party with offices located overseas (in addition to the Australian-based office), such as VISA, MasterCard and China Union Pay. This personal information may be disclosed to and used by the third party's overseas offices, located predominantly in the United States. The disclosure and use of personal information between the third party's Australian-based office and its overseas offices will be governed by that third party's privacy policy.

Tyro relies on third party suppliers who are contracted to conduct certain specialised activities. While personal information may be provided to these suppliers in order to enable them to perform the agreed tasks, Tyro will make every effort to ensure that the supplier handles the personal information in accordance with the Australian Privacy Principles.

Direct Marketing

From time to time Tyro may use personal information to send information regarding Tyro's services and products to a person. If an individual does not wish to receive direct marketing information, that individual can contact Tyro using the following contact details:

Privacy Officer: Priya Chandra
Tyro Payments Limited PHONE 02 8907 1785
EMAIL privacy@tyro.com

Tyro will take immediate steps to ensure that the individual does not receive any direct marketing information in future.

Quality of Personal Information

Tyro's objective is to ensure that all personal information collected by Tyro is accurate, complete and up-to-date. If Tyro is unable to update its records following a request to do so it will notify you and provide its reasons in writing. Tyro will update records if notified that personal information is not accurate, complete or up-to-date. If you believe the personal information that Tyro holds in respect of you is not accurate, please contact us using the following details:

Privacy Officer: Priya Chandra
Tyro Payments Limited PHONE 02 8907 1785
EMAIL privacy@tyro.com

Use and Disclosure of Financial Information

Provided a Merchant Service Agreement has been signed by an individual or company, Tyro may disclose financial information relating to the EFTPOS facility held by that individual or company to mutual third parties for the assessment of the mutual third party's own credit risk where it is in the business of lending money to the individual or company, the improvement of customer service and marketing purposes. Tyro will not disclose the financial information of an individual or company for any other purpose without first obtaining express or implied consent. It is the responsibility of the mutual third party to comply with all applicable regulatory requirements in relation to the use of the financial information.

Security of Personal and Financial Information

Tyro is committed to keeping personal and financial information secure and will take all reasonable precautions to protect personal information from unauthorised access, interference, modification, disclosure, loss, misuse or alteration. Personal and financial information may be stored in hard copy documents or electronically on Tyro's software or

systems. Tyro maintains physical security over its paper and electronic data stores, such as locks and security systems. Tyro also maintains computer and network security using passwords to control and restrict access to authorised staff for approved purposes.

Access to Personal and Financial Information

Any individual or company may request access to the personal and financial information Tyro holds about them and seek correction of this information. Requests should be made in writing and addressed to the Privacy Officer at privacy@tyro.com. In some circumstances, Tyro may not be in a position to provide access or make a correction to the personal information held. If Tyro denies your request, it will provide its reasons in writing.

Change to this Policy

Tyro may change this Policy from time to time for any reason and will update the Policy accordingly. The up to date version of this Policy is located on Tyro's website, www.tyro.com. You will be notified of any changes to this policy by Tyro uploading an updated version to this website.

Complaints

Any complaints should be directed to the Privacy Officer in the first instance at privacy@tyro.com. If you believe Tyro has not adequately dealt with your complaint, you may complain to the Privacy Commissioner, details of which can be found at www.oaic.gov.au.