



## Privacy Policy

This Privacy Policy applies to the collection, use, disclosure and handling of personal information by SNIIP (Australia) Ltd ACN 161 682 068 (“Sniip”, “us” or “we”) including personal information collected via our website [www.sniip.com](http://www.sniip.com) and our mobile application (“App”) (together the “Sites”).

Sniip is an Australian company that operates a mobile payment facilitation application.

We understand that your privacy is important to you and Sniip is committed to protecting the privacy of individuals and is bound by the Australian Privacy Principles and the Privacy Act 1988 (“the Act”). This policy sets out how we collect, use, store or disclose personal information in accordance with the Act. Personal information is information or an opinion about you that can identify you or from which you are reasonably identifiable.

You agree that this Policy and or any Sniip Privacy Collection Notice govern how Sniip deals with your personal information. By using the Sites or submitting personal information to Sniip, you consent to Sniip’s use, collection, storage, disclosure or management of such personal information as described in the Privacy Policy or any Sniip Privacy Collection Notice.

If you do not agree with this policy, please note that we may be unable to provide you with the service you are seeking.

### What personal information is collected?

Sniip collects personal information directly from you when you register or use the App, apply for a job with Sniip, access the Sniip premises, contact Sniip, register for Sniip.com newsletters and alerts, and participate in user posting areas (such as bulletin boards, discussion forums and surveys).

The personal information we collect about you may include (but may not be limited to) your name, email address, location, contact details and information relating to your dealings with Sniip and our clients. For recruiting purposes, the information collected may include personal information that you include on your resume and information that you submit as part of your application including date and place of birth, occupation and education/work history.

In addition, Sniip collects certain information that you do not visibly enter, such as your Internet Protocol (IP) address, browsing pattern on the Sites, click stream data, HTTP protocol elements, and the status of cookies placed on your computer by Sniip.



## **How may Sniip use my personal information?**

Sniip may use your personal information to:

- provide you access to services or content within the App
- for Sniip newsletters or alerts that you agree to receive on occasion, and other Sniip news and information that you consented to receive during registration
- advise you of updates to the App or our services
- enable you to take part in competitions and promotions and notifying you about competition results and special offers, which might interest you, subject to laws on this
- communicate and respond to questions and complaints raised and to provide you with information or advice
- logging issues relating to the App or our services
- provide you with notifications within the App from billers such as payment reminders
- facilitate our own internal business operations
- fulfil any legal requirements
- analyse our services and customer needs with a view to developing new or improved products or services
- issue tax invoices for any services we may provide
- evaluating any job applications;

and for such other purposes as you may initiate or request.

## **If we are unable to collect your personal information**

Generally, you have no obligation to provide any information requested by us. If you choose to withhold requested information we may not be able to provide you with the services that depend on the collection of that information, particularly if the collection of that information is required by law.

If you are seeking employment with Sniip, we may not be able to process your application.

## **How are cookies used?**

Cookies are small packets of information that are stored by your web browser. They are put on your web browser by the websites that you visit. These packets of information do not contain personal information but they do allow us to know if you visit the same website twice or if you visit related websites.

We do the following:



- we only use cookies where they are necessary for our services or where you have provided your express or implied consent
- we respect your wishes, and you can inspect, delete, or block any cookies used by us by selecting the appropriate control in your web browser
- we support technologies that have been developed and are being developed for your web browser that allows you to be more selective about the cookies that your web browser will accept.

### **Is personal information disclosed to third parties?**

Sniip may provide access to your personal information as follows:

- to third party vendors engaged by Sniip to provide services related to the business (including, but not limited to, billing or data storage services, email filtering and sending, virus scanning and other technology service providers, data usage tracking and analysis services, marketing and communications agencies and service providers), subject to appropriate confidentiality provisions
- when you apply or employment with us, Sniip may also disclose your personal information to your referees, third party suppliers who assist with our recruitment and agencies that conduct competency or psychometric tests. We may also disclose your personal information to agencies that conduct criminal and bankruptcy searches on our behalf, where relevant to the role
- in connection with the administration of our share register, investor relations analysis, corporate advisory matters, and reporting obligations
- in order to fix errors, monitor usage, and improve the performance of the App. In addition, our App may include integration with various social-networking sites, including Facebook, Pinterest, Instagram, Google+, LinkedIn, and Twitter. If you enable and use these features within an App, the extent to which your activities and information are governed by the relevant user agreement you have in place with such a third party
- Sniip may also be compelled to surrender personal information to legal authorities without express user consent if presented with a court subpoena or similar legal order, or as required or permitted by the laws, rules, and regulations of any applicable jurisdiction.

### **User forums**

You should be aware that whenever you publicly disclose information online, that information could be collected and used by others. Sniip is not responsible for any action or policies of any third parties who collect information that users publicly disclose in any such forums on the Sites.



### **Link to third-party sites**

Sniip may provide links to third-party Websites or information as a service to our users. If you use these links, you will leave the Sites. Such links do not constitute or imply an endorsement, sponsorship, or recommendation by Sniip of the third party, the third party website, or the information contained therein, and Sniip shall not be responsible or liable for your use thereof. Such use shall be subject to the terms of use and privacy policies applicable to those sites.

### **How can I access or change information?**

You may access, correct or update any personal information that you submit to Sniip. You may also unsubscribe from mailing lists or any registrations with Sniip. To do so, please either follow instructions on the page of the Sites on which you have provided such information, subscribed or registered or contact us at the address provided at the end of this Privacy Policy.

### **Security**

Sniip has implemented generally accepted standards of technology and operational security in order to protect personal information from loss, misuse, alteration, or destruction. Only authorized Sniip personnel and third-party vendors are provided access to personal information, and these employees and vendors are required to treat this information as confidential. Despite these precautions, Sniip, however, cannot guarantee that unauthorized persons will not obtain access to your personal information.

### **Overseas hosting and transfer of information**

Personal information collected on the Sites may be transferred from time to time to Sniip offices or personnel, or to third parties, located throughout the world, and the Sites may be viewed and hosted by Sniip or its vendors anywhere in the world, including countries that may not have the same data protection laws as those found in your country of residence. The countries in which these services are located may vary according to the circumstances, however in the ordinary course of our business we are likely to disclose the information to the New Zealand, the USA, Ireland.

### **Data Retention**

Sniip will only keep your personal information for as long as necessary relating to the purpose for which it was collected, stored, used and or disclosed. We will then take reasonable steps to destroy and / or de-identify the personal information, unless it is required to be retained by law or a court / tribunal order.



## Complaints

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Act, please contact us as set out below. The Sniip Privacy Officer will investigate the complaint and determine whether a breach has occurred and what action, if any, to take. When contacting us, please provide as much detail as possible in relation to the query, issue or complaint.

Head office - [privacy@sniip.com](mailto:privacy@sniip.com)

We will take any privacy complaint seriously. We will aim to resolve any such complaint in a timely and efficient manner, and our target response time is 30 days. We request that you cooperate with us during this process and provide us with relevant information we may require.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also make a formal complaint with the Office of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia):

Office of the Australian Information Commissioner (OAIC)

Complaints must be made in writing

Phone 1300 363 992

Director of Compliance

Mail Office of the Australian Information  
Commissioner

GPO Box 5218

Sydney NSW 2001

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

## Changes to privacy policy

We reserve the right to make changes to this Privacy Policy from time to time. We will alert you to any such changes by updating this Privacy Policy. This Privacy Policy was last updated in July 2018.