

WEBSITE PRIVACY POLICY

This Privacy Policy applies to all personal information collected by RUNPAY™ (**we, us or our**) via the website located at www.runpay.com.au (**Website**).

1. What information do we collect?

The kind of Personal Information that we collect from you will depend on how you use the website. The Personal Information which we collect and hold about you may include:

- login credentials
- payment details
- email address
- name
- phone number
- address; and
- any other personal information provided by you, from time to time or at a later date to us via this website.

2. Types of information

The Privacy Act 1998 (Cth) (Privacy Act) defines types of information, including Personal Information and Sensitive Information.

Personal Information means information or an opinion about an identified individual or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “Personal Information” and will not be subject to this privacy policy.

Sensitive Information is defined in the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

International Privacy Laws may provide additional or different requirements for handling Personal Information and Sensitive Information when data subjects are located in other

jurisdictions or when data transfers occur across borders. For international data processing, we comply with applicable frameworks including:

- (a) the European Union's General Data Protection Regulation (GDPR) for data subjects in the EU/EEA;
- (b) the California Consumer Privacy Act (CCPA) for California residents; and
- (c) other relevant international data protection laws as applicable to your jurisdiction.

Sensitive Information will be used by us only:

- (a) for the primary purpose for which it was obtained;
- (b) for a secondary purpose that is directly related to the primary purpose; and
- (c) with your consent or where required or authorised by law.

3. How we collect your Personal Information

- (a) We may collect Personal Information from you whenever you input such information into the Website, related app or provide it to us in any other way.
- (b) We may also collect cookies from your computer which enable us to tell when you use the Website and also to help us customise your Website experience. How we manage cookies and how you opt in or out is described upon your first visit to our website.
- (c) We use different types of cookies including essential cookies for Website functionality, analytical cookies to improve user experience, and marketing cookies that may be set by third parties. These cookies can also be managed through your own browser's privacy settings. Third-party cookies are subject to their respective privacy policies, which we encourage you to review.
- (d) Prior to setting any non-essential cookies, we will obtain your explicit consent through a clear and prominent cookie banner. This consent mechanism allows you to accept or reject specific categories of cookies individually or modify your preferences at any time. We maintain records of cookie consent choices in accordance with our chosen providers records retention and destruction process.
- (e) We generally don't collect Sensitive Information, but when we do, we will comply with the preceding paragraph.
- (f) Where reasonable and practicable we collect your Personal Information from you only. However, sometimes we may be given information from a third party, in cases like this we will take reasonable steps to make you aware of the information that was provided by a third party.

4. Purpose of collection

- (a) We collect Personal Information to provide you with the best service experience possible on the Website and keep in touch with you about developments in our business.

- (b) We customarily only disclose Personal Information to our service providers who assist us in operating the Website. Your Personal Information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.
 - (a) Our service providers fall into the following categories: (i) hosting and technology providers, (ii) payment processors, (iii) analytics services, (iv) customer support platforms, and (v) marketing automation tools. These providers are contractually bound to protect your Personal Information and may only use it for the specific services they provide to us. We maintain a current list of all third-party service providers and conduct regular security assessments to ensure compliance with our privacy standards.
- (c) By using our Website, you consent to the receipt of direct marketing material. We will only use your Personal Information for this purpose if we have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from use. We do not use sensitive Personal Information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature, such as an unsubscribe button link.
- (d) You can manage your marketing preferences through your account settings. We will make every attempt to process opt-out requests within five (5) business days and maintain records of your preferences. Marketing communications via email range from zero (0) to four (4) messages per month, however this excludes periods by which specific campaigns or events are being launched or promoted, and each communication will clearly display preference management options. If you choose to opt-out, we will retain minimal Personal Information necessary to ensure compliance with your request.

5. Security, Access and correction

- (a) We store your Personal Information in a way that reasonably protects it from unauthorised access, misuse, modification or disclosure. When we no longer require your Personal Information for the purpose for which we obtained it, we will take reasonable steps to destroy and anonymise or de-identify it. Most of the Personal Information that is stored in our client files and records will be kept for a maximum of 7 years to fulfil our record keeping obligations set by Australian governing authorities.

We implement industry-standard security measures including encryption, access controls, and secure data centres to protect your Personal Information. When deletion is required, we use secure erasure methods including digital shredding and physical destruction of storage media. For digital records, we conduct 12 month retention and destruction reviews for active data and 7 years for archived data, after which purge protocols permanently remove the information using secure practices and procedures.

- (b) The Australian Privacy Principles:
 - (i) permit you to obtain access to the Personal Information we hold about you in certain circumstances (Australian Privacy Principle 12); and
 - (ii) allow you to correct inaccurate Personal Information subject to certain exceptions (Australian Privacy Principle 13).
- (c) Where you would like to obtain such access, please contact us in writing on the contact details set out at the bottom of this privacy policy.
- (d) You have the right to request deletion of your Personal Information, subject to our legal obligations. We will respond to such requests within 5 business days and, where appropriate, permanently delete or anonymise your data using industry-standard methods. For data we must retain, we will provide a clear explanation of the legal requirements and retention period. You may also request your data in a structured, commonly used format for portability purposes.

6. Complaint procedure

If you have a complaint concerning the manner in which we maintain the privacy of your Personal Information, please contact us as on the contact details set out at the bottom of this policy. All complaints will be considered by a designated member of our team and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

7. How to contact us about privacy

If you have any questions, or if you seek access to your Personal Information, or if you have a complaint about our privacy practices and procedures, you can contact us via our website where your enquiry will be triaged then directed to the appropriate person within our business structure.