

Swyftx – Privacy Policy

1 About this Privacy Policy

This privacy policy outlines the personal information handling practices of Swyftx Pty Ltd (ACN 623 556 730) and any of our related companies (“our”, “us” or “we”).

We respect the privacy of your personal information and we take your privacy very seriously. We are committed to ensuring the protection of your personal information. The Privacy Act 1988 (Cth), Australian Privacy Principles and registered privacy codes govern the way in which we must manage your personal information. This policy sets out how we collect, use, disclose and otherwise manage your personal information.

2 Collection, Use and Sharing

What information do we collect?

If we deal with you as a current or prospective customer or client, we may collect personal information from you in order to provide you with any of our services and products. We collect your personal information directly from you most of the time, however on occasion, we may also collect information about you from other people and organisations. We collect personal information when you:

- a) enquire about, apply for, or use our products or services;
- b) contact us to make an enquiry or give us feedback;
- c) visit our website or use our digital services;
- d) participate in other activities we offer, such as competitions or surveys; and
- e) talk to us or do business with us.

While we are required to collect some types of personal information to meet our legal obligations, we do attempt to keep our collection of your personal information to what is necessary to offer you the products and services you require. Depending on those products and services, we may collect the following types of personal information:

Types of Personal Information	What kinds of personal information might be involved?
Personal and contact details	This may include your name, address, email address, phone number, and date of birth.
Australian Government related identifiers and identity documents	These may include your: <ul style="list-style-type: none">• Tax File Number and country of tax residency;• Medicare card, Australian passport, driver licence, proof of age/photo ID card, or pension card details;• ImmiCard/Immigration Documents, when foreign passports are supplied; and• citizenship, birth, death and marriage certificates (for example, to verify your identity).
Foreign government identifiers and identity documents	This may include foreign government identity documents and identifiers such as: <ul style="list-style-type: none">• tax identification number and country of tax residency; and• foreign passport and driver licence (for example, to verify your identity at the time you request a product or service).

Financial information	<p>This may include:</p> <ul style="list-style-type: none"> • details of your employment, income, assets, financial liabilities and other evidence relating to source of wealth or funds; and • copies of bank statements and other statements from other financial institutions and government bodies.
Transaction information	This includes information about transactions that you have made using our products and services.
Socio-demographic information	This may include your marital status, age, gender, occupation and nationality.
Interaction information	This includes details of your interactions with us, such as when you have a phone call with us, use our online services, make an enquiry, provide feedback, or make a complaint.
Digital information	<p>We collect information from you electronically when you use our online services. This includes information such as:</p> <ul style="list-style-type: none"> • location information (if enabled on your device); • IP address and source port number; • details of the device or browser used to access our digital services (including mobile and tablet); and • internet service provider network or mobile network provider used by your device. <p>Importantly, we do not link this information to you unless we need to access these details for fraud or security reasons.</p> <p>If you access a social media page operated by us, the information we collect about you may also include your user ID and/or user name associated with that social media service, any information or content you have permitted the third party social media service to share with us, such as your profile picture, email address, followers or friends lists, and any information you have disclosed in connection with that social media service.</p>
Behavioural information	This includes information that we generate about how you use our products and services.
Call recordings	On occasion, we monitor and record our calls with you. We will let you know if we are doing this.
Sensitive information	<p>Sensitive information is personal information that includes information relating to your racial or ethnic origin, criminal history, sexual orientation, membership of any trade or professional associations. In certain situations, we or our third party service providers may collect and use sensitive information. This may include:</p> <ul style="list-style-type: none"> • political affiliation, where relevant for our legal and/or regulatory obligations; and • biometric information (e.g., face), where this information is collected and used for the purpose of automated biometric verification or biometric identification.

	For any other sensitive information, we will only collect this from you with your consent.
Publicly available information	On occasion, we may collect and handle information that is in the public domain, such as from: <ul style="list-style-type: none"> • online forums, websites, Facebook, Twitter, YouTube or other social media (for example, if you use social media to make a complaint); and • public registers (for example, those kept by the Australian Securities and Investments Commission).

How do we use your information?

We are careful about how we use your information to deliver our products and services. We also use your information for other reasons, such as to better understand you, your needs, and to let you know about other products and services you might be interested in.

Here is a list of the ways we may use your personal information.

Purpose	How we use your personal information
Serving you as a customer	We use your information to deliver our products and services, including to: <ul style="list-style-type: none"> • assess and process your applications for products and services; • administer and manage existing products or services you have with us; • manage our relationship with you or your business; • improve our service to you and your experience with us; • communicate with you or your representatives about our products and services; and • let you know about other products and services that may be of interest to you.
Improving our business	We may use your information to improve the products and services we provide, through activities, such as: <ul style="list-style-type: none"> • reviewing customer feedback and assessing how you use our products and services; • testing and validating the effectiveness of products, services and system enhancements; and • monitoring and reviewing call recordings, online chats and other business activity for quality assurance, training and compliance purposes.
Managing our operations	We use your information to manage our operations, including to: <ul style="list-style-type: none"> • deliver our products and services; • make and manage customer payments and transactions; • manage fees and charges due on your products and services; • collect and recover money that is owed to us; and • respond to complaints and seek to resolve them.
Managing security, risk and crime prevention	We use your information to: <ul style="list-style-type: none"> • prevent, detect and investigate suspicious or fraudulent activities;

	<ul style="list-style-type: none"> • support the management of our information security and network controls to prevent cyber-attacks, unauthorised access and other criminal or malicious activities; and • meet our legal obligations and for the legitimate purposes of preventing, detecting, responding to and investigating fraudulent activities and other crimes, protecting the security of our network and systems, and for the purpose of legal claims and actions.
To comply with the law	<p>Where required, we use your personal information to comply with the law, including our regulatory obligations, including to:</p> <ul style="list-style-type: none"> • confirm your identity; • share relevant information with law enforcement agencies, tax authorities and other regulatory bodies; • screen applications and monitor accounts to identify criminal activity such as fraud, terrorist financing, bribery, corruption and money laundering; and • investigate financial crime.
Performing analytic activities	<p>We use your information to run our business in an efficient and proper way. This includes managing our financial position, business capability and planning, testing systems and processes, as well as managing communications, corporate governance, and audit.</p>
Providing de-identified information to other organisations	<p>Sometimes we de-identify your personal information, for example transaction information, and use this to:</p> <ul style="list-style-type: none"> • provide insights and analytics services to other organisations; and • share de-identified information with other organisations. <p>These services help organisations learn about the types of customers they have and their general spending patterns.</p>
Sales or acquisitions	<p>We may also use your personal information to support any changes to the ownership of products or services. For example, we may:</p> <ul style="list-style-type: none"> • sell, transfer, or merge parts of our business, or our assets, including products or services; and • stop providing a particular product or service.

We may also collect, use and share your information for other reasons where the law allows or requires us to.

Direct marketing

From time to time, we may also use your personal information to tell you about products and services we think may be of interest and value to you, but we will stop if you tell us to.

We may contact you by various means, including by mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising through Swyftx websites or through our online services. If you do not want to receive direct marketing offers from us, you can opt-out by:

- updating your message preference settings in your online services
- contacting us using the details below.

We may first require you to log into your Swyftx account or otherwise identify yourself.

Who do we share your information with?

In order to perform the functions and/or activities described above, we may share your information with third parties for the reasons mentioned in *How do we use your information? above*, or where the law otherwise allows or requires us to.

The types of third parties are listed below.

Type of third party	Description
Other entities in the Swyftx group	Our related entities (if any) to facilitate our and their internal business processes.
Authorised Third Parties	<p>We may share information with third parties where you have authorised us to do so or where we are legally required. They include:</p> <ul style="list-style-type: none"> • third parties that you have authorised to act for you (such as accountants, legal representatives, agents, financial advisors, or a person with Power of Attorney); and • third parties authorised by a court in relation to your or your company's affairs (such as a bankruptcy trustees or liquidators).
Third Parties that can verify your information	<p>This includes organisations that can verify information that you have supplied when applying for a product or service, including:</p> <ul style="list-style-type: none"> • other banks and financial institutions that you may have products and services with; and • commercially available third party databases.
Our Service Partners	<p>We may share your information with our service partners, external service providers and other organisations. These include:</p> <ul style="list-style-type: none"> • organisations that we partner with to supply products and services such as financial institutions, merchants and payment organisations; • external service providers that we engage to do some of our work for us, for example legal service providers, organisations involved in maintaining, reviewing, upgrading and developing our computer and business systems and cloud service providers; • organisations involved in our funding arrangements (like investors and advisers) or in a corporate re-organisation or involved in a transfer of all or part of the assets or business of our organisation; • auditors, insurers and re-insurers; • organisations that assist in the identification, investigation or prevention of fraud or other misconduct; and • organisations that provide us with information, including publicly available information, so we can tell you about products and services we think may be of interest and value to you. If you do not wish for your information to be used in this way, you can tell us by opting out of receiving direct marketing communications (see above for Direct Marketing).
Strategic Referral Partners	We may share your information, with external parties with whom we have entered into strategic alliance or referral arrangements to enable you to inquire about the services or products they offer.

	A product refers to any offering of features and benefits to a customer.
Government law enforcement agencies	We may share your information with regulatory bodies, government agencies and law enforcement bodies to comply with our legislative or regulatory obligations in any of the jurisdictions where we operate.

Sending your information overseas

Sometimes, we may send your information overseas, including to:

- service providers or third parties who store data or operate outside Australia (for example, we may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia);
- complete international transactions, such as currency exchanges;
- organisations we partner with to provide products and services; and
- comply with laws and help government or law enforcement agencies.

If we do this, we make sure there are appropriate privacy, data handling and security arrangements in place to protect your information.

Securing your personal information

We use secure systems and buildings to hold your information. We primarily store your personal information in electronic form. The security of your personal information is important to us. We take reasonable measures to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures. This includes maintaining an Information Security Management System aligned and certified against the International Standards Organisation’s ISO/IEC 27001:2022.

We aim to keep personal information only for as long as we need it – for example for business or legal reasons. When we no longer need information, we take reasonable steps to destroy or de-identify it.

Where it is lawful and practical to do so, you may wish to deal with us without providing any personal information, such as by providing a pseudonym or dealing with us anonymously, when you make general enquiries. However, in order to provide some of our services to you, we may need to identify you (in particular, to comply with AML/CTF requirements).

3 Accessing your information

Accessing, updating and correcting your information

You can contact us via our live chat support or by the email outlined at section 8 and ask to view your information. For more detailed information, we may ask you to fill out a request form. If your information isn’t correct or needs updating, let us know straight away.

How can I access my information?

You can ask us for a copy of your information by going online or emailing us.

There is no fee to ask for your information, and we try to make your information available within 30 days after you ask us for it. In some cases, we can refuse access or only give you access to certain information. For example, we might not let you see information that involves other people. If we do this, we will write to you explaining our decision.

Can you correct or update your information?

It's important that we have your correct details, such as your email address and phone number. You can check or update your information via our platform or by contacting our live chat support.

If you think your personal information is incorrect, contact us to investigate the issue. We will try to respond to your request within 30 days. If we can't, we will let you know why it is taking longer. If we do not think the information needs correcting, we will write to let you know why. You can ask us to include a statement with the information that says you believe it is inaccurate, incomplete, misleading or out of date.

4 Cookies

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications. Each time you visit our website, we collect information about your use of the website. We may use technology called 'cookies' when you visit our site. Cookies are small pieces of information which are sent to your browser and stored on your device or computer's hard drive. Cookies are utilised by almost all websites that you visit and allow websites and browsers to operate more efficiently, improve your browsing experience as well as to provide anonymised information to the owners of the site.

Cookies can record information about your visit to our site. The cookies we send to your device or computer cannot read your hard drive, obtain any information from your browser or command your device or computer to perform any action. They are designed so that they cannot be sent to another site, or be retrieved by any non-Swyftx site. Cookies do not damage your device or computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. You can also de-activate the use of cookies if you do not want to receive targeted advertising; however, although this may impact the operation of the website.

We may use cookies and other unique identifiers to recognise you as a customer and user of Swyftx, to customise our services and advertising, and to collect information in order to alleviate the risk of fraud and illegal conduct. We may also utilise cookies to assist in delivering targeted advertising campaigns at certain times through third party sites. In order to provide a more user-friendly experience and enhance security, cookies and other unique identifiers will also be used to allow our website to recognise your device or computer when you return in the future.

5 Consent

By opening an account with Swyftx, visiting our website, entering competitions run by us, and/or using our platform and services, you consent to the collection and use of the information you have provided to us for the purposes described above.

6 Complaints

If you have a complaint concerning the manner in which we maintain the privacy of your personal information, please contact us at privacy@swyftx.com.au. All complaints will be considered and recorded, and we will aim to acknowledge your complaint within seven days. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. We will aim to provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer, you may make a complaint to the Privacy Commissioner which can be contacted on either www.oaic.gov.au or 1300 363 992.

7 How we may change this statement

We may amend or update this Policy at any time. Any changes to our Privacy Policy will be publicised on our website.

8 More information

For more information about any issue raised in this Privacy Policy or any other concerns, please contact us at privacy@swyftx.com.au

For more information about privacy in general, you can visit the Australian Information Commissioner's website at www.oaic.gov.au.

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