



# Zeller Privacy Policy (December 2020)

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## 1. About this Privacy Policy

*This section describes the purpose of this document and explains which entities this Privacy Policy applies to.*

- 1.1 NPCO Pty Ltd ACN 637 321 147 (**Zeller, we, us** or **our**) has implemented this Privacy Policy to provide information about what kinds of Personal Information we may collect or hold, how we collect, hold, use and disclose that Personal Information, choices you have regarding our use of that Personal Information, and your ability to access or correct that Personal Information. If you wish to make any inquiries regarding this Privacy Policy, you should contact our Privacy Officer in any of the ways specified in paragraph 15.
- 1.2 From time to time, Zeller may be related to other companies and entities (related entities). This Privacy Policy applies to the use of your Personal Information by us and by those related entities. Those related entities may also have their own privacy policies which set out additional detail or differences in their privacy practices. To the extent that those privacy policies are inconsistent with this Privacy Policy, those privacy policies will prevail over this Privacy Policy in relation to the actions of those related entities. A reference in this Privacy Policy to **Zeller, we, us** or **our** is also a reference to those related entities.

## 2. Personal Information

*This section explains what is meant by "Personal Information".*

- 2.1 "**Personal Information**" is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.

## 3. What Personal Information do we collect and hold?

*This section explains generally the types of Personal Information we collect (including a non-exhaustive list of examples), and who we generally collect that Personal Information from.*

- 3.1 The types of Personal Information we may collect about an individual will depend upon the nature of our interaction with them. Personal Information that we collect may include (but is not limited to) the following:
- (a) **our customers and potential customers (merchants):** details to verify your identity, assess your application for our products and services, provide our products and services, and monitor, identify and prevent fraud, including: your full name; date of birth; contact details; current and previous addresses; document identification numbers (such as passports, driver's licence, Medicare numbers, or other national cards); other identity verification information including from third parties, the Australian Government's Document Verification Service (**DVS**), other countries' identity verification sources, identity information from credit files, and other data reference points; financial account details including

bank account and credit card / debit card numbers; bank statements and statement for your utility accounts; invoices or proof of purchases relating to card transaction, whether that is acquired or spent; geographical location; business or company details including ABN and ACN; transaction data including acquired card, QR code, Buy Now Pay Later, and spent card transaction data; and the further information set out in paragraph 3.1(f)

- (b) **our merchants' customers:** contact details (phone number and email) to electronically send a receipt of your transaction to you; transaction data when making payments to merchants using Zeller technologies, including acquired card, QR code, Buy Now Pay Later, and spent card transaction data; and the further information set out in paragraph 3.1(f)
- (c) **our investors and shareholders:** identification information and information about your shareholding, to identify our investors and shareholders and to administer their investment in Zeller
- (d) **our suppliers, potential suppliers, and their representatives:** generally information to assess your business (such as its key personnel); and business contact information (names, roles, contact details) to communicate with you, arrange and administer your provision of goods and services to us
- (e) **our employees past and present, including job applications:** occupation and employment details including employment status and any previous work experience; information in connection with your employment with us (which may include health information); and information from or in connection with your resume or job application if you apply for a position with us (including information from referees and to verify your qualifications, work and academic history), and
- (f) **any person who comes into contact with Zeller or our technologies:** information about your contact with us, including: device telemetry data including location, battery status, data connectivity status and thermal data, in respect of Zeller devices; all other data and metadata produced by collected data or interactions with Zeller, including all user interactions with our devices, Websites, and other technologies; photographs and/or images from camera footage such as CCTV cameras in our premises; and information from social media accounts and profiles, and other publicly available sources.

3.2 We are also required by various laws to collect certain information including Personal Information. Those laws include the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* (**AML/CTF Act**), the AML/CTF Rules under the AML/CTF Act, and other regulatory schemes.

#### 4. How and when do we collect Personal Information?

*This section describes the general situations and interactions through which we collect Personal Information. It also describes some scenarios where we will*

*collect your Personal Information from other people or sources. This section also describes the consequences if we are unable to collect Personal Information.*

- 4.1 We collect your Personal Information to allow us to conduct our business functions, to provide, market and sell our products and services and for the specified purposes set out in paragraph 6. In some circumstances the collection of Personal Information may be required by law.
- 4.2 We may collect your Personal Information:
- (a) **when you apply for our products:** when a potential merchant submits an application for our products, including providing personal information so we can perform an identity verification check on you; or when you request general information about our products
  - (b) **when you use our products:** when a merchant uses our products, we collect information about that use, including via remote readings of device telemetry (typically hardware sensor information) from our products/devices
  - (c) **when you interact with our services (other than our products):** when our merchants' customers interact with Zeller devices and technologies we collect information about that use, including via remote readings of device telemetry (typically hardware sensor information) from our products/devices; and when you visit our Website (see paragraph 5)
  - (d) **when we receive goods and services from you:** when you provide that information to manage our relationship with your business; and when we communicate with you
  - (e) **when you attend our premises:** when you visit or attend our premises we may collect visitor information and information from our security cameras and systems
  - (f) **when you manage your relationship with us or otherwise communicate or interact with us:** for example, when you provide feedback or information to us; when you submit a job application; or when you otherwise contact us by any means, and
  - (g) **in other situations:** when otherwise required or authorised by law.
- 4.3 Generally, when providing our products and services, dealing with our personnel, or obtaining goods and services from our service providers, suppliers or contractors, we collect Personal Information directly from the relevant individual where reasonable and practicable.
- 4.4 We may also collect Personal Information about you from third parties and other sources such as:

- (a) identity verification service providers, who in turn may access third party databases, document issuers, official record holders, DVS and other sources in order to perform identity verification services
- (b) your nominated representatives (eg spouse, accountant, power of attorney, brokers and other professional advisors)
- (c) publicly available sources of information
- (d) related entities, companies and businesses of Zeller, or
- (e) credit reporting bodies,

but we will only collect your Personal Information in this way if it is unreasonable or impracticable to collect this information directly from you or if we are otherwise permitted to do so.

- 4.5 If the Personal Information we collect includes sensitive information, including health information, we will ask for your consent to collect sensitive information, unless the law allows us to collect it without your consent.
- 4.6 Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.
- 4.7 If you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, or if we do not or are unable to collect the Personal Information we require, we may not be able to provide you with some requested information, products or services, or to effectively conduct our relationship with you.

## 5. Information collected via our Website and other technology.

*This section describes generally the ways we may automatically collect information (including Personal Information) through the operation of our Website and other technologies.*

- 5.1 Personal Information may be collected by us and by our third party service providers who assist us in operating our website at <https://myzeller.com>, including its/their subdomains and any other website we operate from time to time (collectively the **Website**).
- 5.2 We may use various technological methods from time to time to track the visiting patterns of individuals accessing our Website or using our technology including but not limited to the methods set out in this paragraph 5.

### ***Google Analytics***

- 5.3 We use Google Analytics to help analyse how you use our Website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated is used to create reports about the use of our Website. Google will store this information.

- 5.4 If you do not want your Website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

***Click Stream Data***

- 5.5 When you read, browse or download information from our Website, we or our internet service provider may also collect information such as the date, time and duration of a visit, the pages accessed, the IP address of your computer, and any information downloaded. Generally, this information may be used for purposes including statistical, reporting and website administration, maintenance and improvement purposes.

***Cookies***

- 5.6 Our Website may use 'cookies' from time to time. Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. Cookies may be used on our Website to monitor web traffic, for example the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our Website.
- 5.7 Cookies are sometimes also used to collect information about what pages you visit and the type of software you are using, and other purposes from time to time. If you access our Website or click-through to our Website from a link in an email we send you, a cookie may be downloaded onto your computer's hard drive.
- 5.8 You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.
- 5.9 If you disable the use of cookies on your web browser or remove or reject specific cookies from our Website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

***Web Beacons***

- 5.10 Web beacons are images that originate from a third party site to track visitor activities. We use web beacons to track the visiting patterns of individuals accessing our Website.

***Interaction data***

- 5.11 We collect and use all data and metadata produced by collected data or interactions with Zeller, our devices, our Website, or our technology for purposes such as data analysis, improving service quality and improving product features. We may use this information generally for our business functions and activities, including providing support to our merchants,

improving service quality, improving product features, and for use in connection with potential future products.

***Third party content (eg social media links)***

- 5.12 Some of the content on our Website may include applications made available by third parties, such as social media buttons or links that allow you to share content or links to our Website through the relevant third party platforms. These third party applications themselves may facilitate collection of information by those third parties, through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third party websites to understand their privacy practices and options they may make available to you in relation to their collection of your Personal Information.

**6. How do we use your Personal Information?**

*This section describes the general purposes for which we collect Personal Information (including a non-exhaustive list of examples).*

- 6.1 We use the Personal Information we collect about you for our business functions and activities, in order to operate our business efficiently, and to market our products and services for the benefit of our customers.

- 6.2 We may collect, hold and use your Personal Information:

- (a) **to communicate with you:** including when you contact us or when we need to contact you
- (b) **to conduct identity verification and to comply with any contractual and legal obligations:** including undertaking identity verification checks through third parties; allowing our vendors and service providers to carry out audits of Zeller in connection with our provision of products and services, including to merchants; allowing third party payment aggregators to contact merchants directly to offer their services directly to those merchants; and otherwise complying with our statutory and legal obligations
- (c) **to assist you or to provide, manage and support your Zeller products and services:** including account creation, administration and management; providing payment systems to our merchants; providing customer information and support; setting up direct debit authorities; providing our products and services; undertaking device management, device and product diagnostic purposes, and remote administration; undertaking debt recovery (including selling bad debts owed to us to third parties);
- (d) **to improve our services and for new product development:** including to enhance our products or services; to enhance goods and services from our suppliers and subcontractors; to conduct research (for example to

understand your needs and the needs of our customers generally);  
and to create new products or services

- (e) **to protect you and our services against fraud, theft and other unauthorised uses:** including undertaking fraud monitoring and identification, and fraud analysis, risk assessment and fraud risk management
- (f) **to promote and market our products and services:** including direct marketing; providing you information we believe you may be interested in receiving regarding Zeller, our clients, and our business partners, and
- (g) **for other business activities such as research, recruitment and other investigations:** including providing for safety and security of workers and onsite visitors; personalising your experiences on our Website; for data analytics which we may use generally for our business functions and activities, including providing support to our merchants, improving service quality, improving product features, and for use in connection with potential future products; managing our business operations (including business support such as maintenance, backup and audit; assessing and processing job applications; responding to queries or complaints; for shareholder/investor management and administration, and to submit applications to, or respond to enquiries from, corporate regulators; and investigating, reviewing, responding to and informing affected individuals of data breaches involving their personal information.

6.3 We may aggregate information including Personal Information for reporting, statistical and analysis purposes, and for business, product and service improvement purposes. This allows us to better inform ourselves and anticipate our customers' preferences and requirements, and to monitor and improve the effectiveness of our business, products and services. We may also de-identify information for inclusion in such aggregated databases or reports.

6.4 We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law. However, this will be at our discretion, and nothing in this Privacy Policy requires us to monitor the use of the Website or to retain the content of any specific user session.

6.5 You consent to us using your Personal Information in the above ways and as set out in this Privacy Policy.

6.6 We may otherwise collect, use or disclose your Personal Information where the collection, use or disclosure is:

- (a) in accordance with this Privacy Policy or any agreement you enter into with us, or
- (b) required or authorised by law, including without limitation the Australian Privacy Principles under the *Privacy Act 1988 (Cth)*.



## 7. When do we disclose your Personal Information?

*This section describes the situations in which we may disclose your Personal Information to others, including a non-exhaustive list of the types of third parties we may disclose your Personal Information to.*

- 7.1 Zeller may disclose, or provide access to, your Personal Information to third parties in connection with the purposes described in paragraph 6. Depending on the circumstances and the nature of your engagement with us, we may disclose your Personal Information to our related entities, to third parties that provide products and services to us or through us, or to other third parties (such as your referee(s) in connection with a job application you have submitted).
- 7.2 We may also disclose your Personal Information to:
- (a) **other parts of our organisation:** including our internal teams and business units, and our related companies
  - (b) **your nominated representatives**
  - (c) **third parties involved in providing our services to you:** such as payment scheme operators (such as Visa, MasterCard, EFTPOS, American Express, ChinaPayments (AliPay and WeChat Pay), Zip Money); acquiring banks or acquiring payment processing service providers; prepaid issuing programme partners; direct entry processing service providers; and third party identification service providers who may disclose your Personal Information to document issuers or official record holders, and check with other third party databases, in order to verify your identity. In connection with their provision of these services, these third parties may also require access to Personal Information, merchant and transactional data to carry out audits of Zeller in connection with our provision of products and services, including to merchants
  - (d) **our other supply chain partners and vendors:** who supply us goods and services or assist us in providing products and services to you; or who help us administer our business (such as data storage or processing (including in cloud based data storage facilities or through cloud computing service providers), printing, mailing, marketing, planning and product or service development), banks, lenders, valuers, insurers, brokers and other IT service providers; medical providers including medical and rehabilitation practitioners for assessing and managing workplace insurance claims (in respect of our employees); employment agencies (in respect of candidates or employees they have supplied or may supply to us); and purchasers of bad debt owed by a merchant to Zeller, to allow those purchasers to recover those debts
  - (e) **our professional advisers:** who provide advice or perform functions on our behalf, such as lawyers, auditors and business consultants, and

- (f) **law enforcement, regulatory and government bodies:** such as regulatory authorities, law enforcement agencies, and other authorities or organisations as required or authorised by law (such as AUSTRAC, the ATO, ASIC, DHHS and the Police).

7.3 As we continue to develop our business, we may buy, invest in, merge or partner with other companies or organisations, and in so doing, acquire customer Personal Information. In such transactions, Personal Information may be among the transferred assets. Similarly, in the event that a portion or substantially all of our business or assets are sold or transferred to a third party, or new investments are made in Zeller, we may also disclose certain information including your Personal Information to a purchaser, potential purchaser, or potential investor in connection with the sale, potential sale, or investment, of us, our business or any of our assets, including in insolvency.

## 8. Interstate and Overseas disclosures

*This section describes when your Personal Information may be disclosed overseas (outside of Australia). It specifies the countries or regions where it is likely that our IT facilities are located or in which third parties who receive that Personal Information from us are likely to be located.*

- 8.1 We are a national organisation and may collect, use and disclose Personal Information generally within Australia (including between states and territories).
- 8.2 Some of your Personal Information may also be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers. This may happen if:
  - (a) our offices or related entities are overseas
  - (b) we outsource certain activities overseas
  - (c) transactions, information, services or products have an overseas connection, or
  - (d) our computer systems (including third party IT service providers we may use from time to time) including IT servers are located overseas.
- 8.3 You consent to the collection, use, storage, and processing of your Personal Information outside of Australia as set out in this Privacy Policy.
- 8.4 In particular, your Personal Information may be disclosed to third parties in Singapore, US, Ireland, India, Ukraine and Europe, and such other countries or regions, in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this Privacy Policy. In these circumstances, you consent to the collection, use, storage and processing of your Personal Information in those countries, without us being responsible under the *Privacy Act 1988 (Cth)* for such use (or for any breach). Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you might not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your personal information.

## 9. Other uses and disclosures

*This section explains that we may collect, use and disclose your Personal Information for additional purposes.*

- 9.1 We may collect, use and disclose your Personal Information for other purposes not listed in this Privacy Policy. If we do so, we will take reasonable steps make it known to you at the time we collect or use your Personal Information.

## 10. Marketing

*This section explains how we may use your Personal Information for sending you marketing, and how you can opt out of receiving marketing information from us.*

- 10.1 You consent to us using your Personal Information for sending you information, including promotional material, about us or our products and services, as well as the products and services of our related entities and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, email, SMS and MMS messages.
- 10.2 If you do not want to receive marketing information from us you can unsubscribe in any of the following ways:
- (a) clicking on the 'Unsubscribe' or subscription preferences link in a direct marketing email that you have received from us, or
  - (b) contacting us using the contact details specified in paragraph 15.

## 11. Storage and security of Personal Information held by us

*This section explains our security practices and that we may destroy or de-identify Personal Information once we no longer require or have no further need for it.*

- 11.1 We aim to keep your Personal Information secure. We are PCI PIN and DSS compliant, which require us to maintain industry standards relating to data protection and security. Any Personal Information that is collected via our Website or which is held on our computer systems is protected by safeguards including physical, technical (firewalls, SSL encryption etc) and procedural methods.
- 11.2 We may retain and dispose of your Personal Information in accordance with our document and information retention policies and procedures. Transaction-related data may be retained for a minimum period of 7 years from its creation. If we find that we no longer require or have no further need for your Personal Information we may de-identify it or remove it from our systems and destroy all record of it.

**12. You can access and update your Personal Information**

*This section explains that you have rights to access and seek correction of your Personal Information that we hold, and how you can exercise those rights.*

- 12.1 You are generally entitled to access Personal Information that we hold about you. If you request access to your Personal Information, in ordinary circumstances we will give you full access to your Personal Information. Depending on the nature of the request, Zeller may charge for providing access to this information, however such charge will not be excessive. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where we are required by law to give those reasons.
- 12.2 You can access and correct some of your Personal Information and other merchant information through self-service by logging into Zeller's Merchant Portal and updating or editing that information at any time. Alternatively, a request for access or correction can be made by contacting our customer support team by telephone or our Privacy Officer by email as specified in paragraph 15.
- 12.3 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete.
- 12.4 Please contact us in any of the ways specified in paragraph 15 if you believe that the Personal Information is inaccurate, incomplete or out of date, and we will use all reasonable efforts to correct the information.
- 12.5 It would assist us to ensure we properly understand your request, and allow us to respond more promptly, if requests are made in writing and include as much detail as possible.

**13. How do we deal with complaints about privacy?**

*This section explains how you may make a complaint to us in respect of our treatment of your Personal Information, and how we will deal with that complaint.*

- 13.1 If you feel that we have not respected your privacy or that we have conducted ourselves inconsistently with this Privacy Policy, please contact our Privacy Officer in any of the ways specified in paragraph 15 and advise us as soon as possible. We will investigate your queries and privacy complaints within a reasonable period of time depending on the complexity of the complaint.
- 13.2 It would assist us to respond to your complaint promptly if it is made in writing. Please detail information relevant to your complaint.
- 13.3 We will notify you of the outcome of our investigation.

## 14. Updates to this Privacy Policy

*This section explains that we can make updates to this Privacy Policy, how we may notify you about those updates, and how you may otherwise ensure you are aware of our most recent version of this Privacy Policy.*

- 14.1 We may, from time to time, review and update this Privacy Policy, including to take into account new laws, regulations, practices and technology. All Personal Information held by us will be governed by our most recent Privacy Policy, which will be posted on our Website at: <https://myzeller.com>. Any changes to this Privacy Policy may be advised to you by updating this page on our Website. We will aim to provide reasonable advance notice of such changes though this may not always be possible depending on the circumstances. We encourage you to check this page from time to time for any changes.

## 15. What to do if you have a question, problem or complaint, or want to contact us about our use of your Personal Information or this Privacy Policy

*This section explains our contact details to allow you to contact us if you have a question, access or update request, problem or complaint about privacy, or would like to opt out of direct marketing from us.*

### 15.1 If you:

- (a) have a query or concern about this Privacy Policy or our Personal Information handling processes
- (b) wish to make a complaint in relation to a breach of your privacy
- (c) would like to access your Personal Information held by us
- (d) would like to update or correct your Personal Information held by us, or
- (e) would like to opt out of direct marketing,

please contact our Privacy Officer in any of the following ways:

- » Phone: 1800 935 537, or
- » Email Address: [privacy@myzeller.com](mailto:privacy@myzeller.com).

If you are concerned your personal information has been mishandled, please first approach our team to help resolve the issue. If you are not happy with our response or we have not responded within 30 days, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) which is free to customers.

- » Their address is:  
Office of the Australian Information Commissioner. GPO Box 5218 Sydney NSW 2001
- » Phone: 1300 363 992
- » Website: [www.oaic.gov.au](http://www.oaic.gov.au)