



## Privacy Policy

PayStay respects people's privacy. PayStay is bound by the Australian Privacy Principles in the *Privacy Act 1988* (Cth) (the **Privacy Act**), as well as other applicable laws protecting privacy. PayStay will ensure that all the personal information that it handles is managed in accordance with those laws.

In this Privacy Policy:

**PayStay** means Sarb Management Group Pty Ltd (ACN 106 549 722) trading as PayStay;

**personal information** means information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

This Privacy Policy describes how PayStay manages personal information. PayStay may modify or update its Privacy Policy from time to time by publishing it on the PayStay website - <https://www.paystay.com.au>. PayStay encourages individuals to check the PayStay website periodically to ensure that they are aware of PayStay's current Privacy Policy.

### What personal information does PayStay collect and why?

PayStay collects the personal information it needs to provide services and information to its customers and the community, for its business operations (including the operation of PayStay) and to comply with the law. If an individual chooses not to provide certain personal information to PayStay, PayStay may not be able to provide the individual with certain services or information relating to PayStay.

Generally, if appropriate, PayStay will tell an individual why PayStay is collecting personal information when PayStay collects the information and how PayStay plans to use the information, or these things will be obvious when PayStay collects the information.

The following are the main types of personal information collected by PayStay and the main purposes for which they are collected.

Further information about data collected, its sources and use thereof in the provision of the PayStay service is set out in Appendix A attached to this Privacy Policy.

### GENERAL PURPOSES FOR COLLECTION AND USE OF PERSONAL INFORMATION

#### **To provide its services and products including the PayStay service**

PayStay may collect information about an individual such as his or her name and contact details (including mobile phone number), date of birth, payment and billing information, credit card number, vehicle registration number, vehicle make, model, year, colour, and information about his or her use of PayStay services and PayStay services including the date and time of use. PayStay may use this

information to supply its services, operate PayStay and collect payment for use of parking and the PayStay service. PayStay may also use this information in order to be able to provide you with the additional features or ancillary services that you elect to use through the PayStay App. PayStay may use the personal information you provide us with to market the services and features of the PayStay service and products and those of its partners to you.

#### **To comply with the law**

PayStay may collect information about an individual as required or permitted by law. For example, PayStay is required by law to keep certain records, including information about the payment and non-payment of parking services.

#### **To assist with queries**

An individual may provide PayStay with his or her name or other contact details when he or she calls PayStay by phone, writes to PayStay or contacts PayStay using its websites so that PayStay can respond to requests for information about customer accounts, its services and PayStay. For example when an individual makes an enquiry using a PayStay website or by calling the PayStay Call Centre, he or she may be asked to provide a name, email address, telephone number and other contact information.

### **As part of PayStay's general business operations**

PayStay also collects personal information about individuals who are contracted to, or employed by, PayStay, PayStay's suppliers (including third party service providers), related companies, agents and customers. As required, this information may include an individual's name contact details and other information necessary for PayStay to conduct business or maintain an employment relationship with that individual.

### **To consider an application for a job with PayStay**

When an individual applies for a job or contract with PayStay, PayStay may collect certain information from the individual (including his or her name and contact details, information about his or her working history and relevant records checks), from any recruitment consultant and from the individual's previous employers and others, including referees and publicly available sources, that may be able to provide information to PayStay to assist PayStay in its decision on whether or not to make the individual an offer of employment or engage the individual under a contract. This Privacy Policy may not apply to acts and practices in relation to employee records of PayStay's current and former employees, which may be subject to the employee records exemption in the Privacy Act.

### **How does PayStay collect personal information?**

PayStay will generally collect information directly from the individual to which it relates. However, PayStay may collect information about an individual from a third party, such as when provided PayStay's clients which may include corporate entities, government organizations or agencies or other organisations to whom PayStay provides its services. PayStay may supplement the information it collects with information from other sources, such as generally available publications.

### **How does PayStay use and disclose personal information?**

PayStay generally uses and discloses personal information for the purposes for which it was collected, in order to provide PayStay services and deliver PayStay (including as described above), to recover fees payable under your customer service agreement, for debt collection and enforcement purposes, to investigate or to pursue any legal claim that we or may have against you, or as otherwise required or authorised by law.

PayStay discloses certain personal information to its clients where required by legislation.

When PayStay collects personal information, it may sometimes also use that information to carry out market research and other analysis so that PayStay can improve its services and improve the operation of PayStay. As part of conducting PayStay's business, personal information may also be used to maintain and develop PayStay's business systems, including testing and upgrading them.

PayStay Customer Relations may use an individual's personal information to keep the individual up to date with information about PayStay services and PayStay. If the individual does not want PayStay to use their personal information in this way or to be sent any further information, the individual can always let PayStay know by unsubscribing from emails or contacting PayStay Customer Service using the contact details given below.

PayStay may de-identify information about an individual so that the information can no longer be related to that individual. PayStay may then use and disclose that de-identified information in the course of its business. PayStay may also aggregate information on the use of its services and PayStay (for instance, Parking Facility use) in such a way that no information identifying an individual is disclosed and may use and publicly disclose such aggregated information.

Where appropriate, PayStay may handle personal information relying on exemptions that are available under applicable privacy laws, including, for example, the employee records exemption in the Privacy Act and provisions in the Privacy Act concerning the sharing of personal information among related bodies corporate.

### **Disclosing personal information**

For the purposes described in this policy, PayStay may disclose personal information:

- subject to any restrictions imposed by any relevant legislation, to any related entities of PayStay (including related entities located internationally);
- under legislative requirements such as with the local governments who operate Parking Facilities;
- to PayStay's suppliers, service providers, professional advisers and agents. The types of suppliers PayStay may disclose personal information to include:
  - call centre operators;
  - mailhouse organisations;
  - contractors;
  - support and maintenance and logistics contractors;

- debt collection companies and credit reporting bodies;
- information technology suppliers that provide support, maintenance and upgrade services for PayStay systems;
- direct marketing contractors;
- to government agencies and any entity responsible for the collection of parking fees or the taking of enforcement action concerning use of Parking Facilities;
- to anyone to whom PayStay's assets or business (or any part of it) is transferred;
- where an individual to whom the personal information relates has otherwise consented; or
- as otherwise required or permitted by law. For example, PayStay may disclose information in response to a subpoena, warrant, or request from a government law enforcement agency, or as required under legislation and regulations. PayStay may disclose information to AUSTRAC under applicable anti-money laundering legislation if you have an account balance above \$5,000.

#### **Cross-border disclosures**

PayStay may disclose information to recipients that are located outside Australia. PayStay may disclose personal information to overseas contractors, and may use off-shore servers for the purposes of data storage. PayStay has engaged contractors in the Philippines, the United States and certain other countries, and may disclose certain personal information to those contractors. PayStay may also disclose certain personal information to related entities internationally, although such information will typically only relate to employees and internal corporate matters and not customer information or the operation of PayStay in Australia. PayStay will take commercially reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

#### **Cookies and IP address tracking**

PayStay's websites may use cookies for site administration purposes. If for any reason an individual wishes not to take advantage of cookies, the individual may have his or her browser not accept them (although this may disable or render unusable some of the features of a PayStay website).

PayStay's websites may also detect and use an individual's IP address or domain name for internal traffic monitoring and capacity purposes or to otherwise administer the website. No personal information is obtained, rather the patterns of usage of visitors to the website may be tracked for the purposes of providing improved service and content based on aggregate or statistical review of user site traffic patterns.

#### **Links to other sites**

A PayStay website may contain links to other websites. PayStay is not responsible for the privacy practices or the content of such other websites. The privacy policies applicable to such other websites may differ substantially from this Privacy Policy, so PayStay advises individuals to read them before using those websites. PayStay will not be liable for any use of those websites.

#### **Security**

PayStay implements a number of physical and electronic measures to protect personal information. We restrict access to our electronic databases, maintain firewalls and encrypt certain data where practicable to do so. Please note, however, that the internet is not a secure environment and although all care is taken, PayStay cannot guarantee the security of information provided to it via electronic means.

#### **Access and correction and complaints handling**

An individual has a right to access most personal information that PayStay has about that individual. In some circumstances it may not be possible for PayStay to provide the individual with all of his or her personal information or an exemption under the Privacy Act may apply. For instance, PayStay may not provide access to information if disclosing that information would impact on the privacy of another individual. Where PayStay will not provide access to personal information held about an individual, PayStay will tell the individual why.

When an individual requests access to personal information, PayStay may need to take measures to verify the individual's identity before providing them with such information. If an individual thinks that any personal information PayStay holds about him or her is inaccurate, the individual may contact PayStay Customer Service and PayStay will take reasonable steps to ensure that the information is corrected. PayStay can correct most personal information over the telephone, but correction requests may need to be made in writing in some cases.

If an individual wishes to make a complaint about the way PayStay has handled his or her personal information (including if the individual thinks PayStay has breached the Privacy Act) the individual may do so by contacting PayStay Customer Service in writing, by mail or email to the address or email address set out at the end of this Privacy Policy. If a complaint is made, please include contact details such as email address, name, address and telephone number and clearly describe the complaint. PayStay Customer Service will investigate the complaint and respond promptly. If the complainant considers that PayStay has failed to resolve the complaint satisfactorily, the complainant can complain to the Office of the Australian Information Commissioner.

As at the date of this Privacy Policy, the **Office of the Australian Information Commissioner's contact details are as follows:**

**Mail:**

Sydney Office  
GPO Box 5218 Sydney NSW 2001

Canberra Office  
GPO Box 2999 Canberra ACT 2601

**Telephone:** 1300 363 992

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Website:** <http://www.oaic.gov.au/>

**Anonymity**

Where it is lawful and practicable, PayStay will provide an individual with the option to deal with PayStay and use PayStay without identifying themselves.

**Access and Correction**

For access and correction enquiries and complaints, please contact PayStay Customer Service using the contact details provided below.

**Contact Details - PayStay Privacy Officer**

Attn : PayStay Privacy Officer  
P. O. Box 837, North Melbourne, VIC 3051  
Phone: 03 9320 9000

[privacy@data.com.au](mailto:privacy@data.com.au)

## APPENDIX A: PAYSTAY DATA COLLECTION AND USE

The PayStay Privacy Policy covers all personal information that is collected about individuals. By “personal information” we mean information that either on its own or when combined with other information held by us enables you to be identified as an individual. Such information may include your name, date of birth, gender, title, address, email address, computer IP address, phone number and/or credit card details.

The different types of data that qualifies as personal information that may be collected includes:

| <b>Type of Data Collected</b> | <b>Attributes (that may be included)</b>  |
|-------------------------------|---|
| Identity Data                 | First name, middle name, last name, title, date of birth, username, password and other login data   |
| Contact Data                  | Address (home or business), phone numbers, email addresses  |
| Profile Data                  | Your preferences and interests, feedback, survey responses and other account information including vehicle registration and other data  |
| Financial Data                | Credit card details, bank account details   |
| Transaction Data              | Details about the transactions you’ve undertaken in using the PayStay services or products  |
| Technical Data                | Internet protocol (IP) address, browser information (including plug-ins), operating systems, platforms, device information, login information and technical information from devices, technical data from analytics providers such as Google and search information providers   |
| Usage Data                    | Information about how you use PayStay website and PayStay App including URL clickstreams, products/services you used or searched, page response times, download or access errors, page interaction (including length of page visit, scrolling, clicks or selections, mouse-overs and how you access or move away from a page) |
| Marketing Data                | Your communication and marketing preferences  |

In addition to the personal information we collect, we also collect and use aggregated data such as statistical or demographic data. We may also derive aggregated data from the personal information that you provide us. (Aggregated data does not directly, or indirectly, reveal your identity).

Your personal information is used by PayStay to provide the PayStay services and products and to market and provide these services and products and those of PayStay partners and our related entities to you. Specific examples of use include:

- Registration as a PayStay customer;
- Managing our relationship with you – notifications about new services, updates to services, terms of use or this privacy policy;
- Maintaining accurate information about you including verification of your identity and financial information provided;
- Facilitating transactions via the PayStay service;
- Notifying you of outstanding fees, or expenses (including infringements) whether or not you are an active PayStay user, and whether or not these expenses were incurred whilst using the PayStay service;
- Improvement of the PayStay App, PayStay website, products/services, customer experience and marketing with data analytics;
- To recommend products and services that may be relevant to you; and
- Compliance with legal requirements

Your personal information may be transferred to:

- Partners who provide the products/services you have subscribed to via PayStay
- Related entities of Sarb Management Group Pty Ltd trading as PayStay (including subsidiaries and holding companies) to enable your access to products/services, customer support and other activities described within the PayStay Privacy Policy.
- Credit reference agencies and financial institutions for the purpose of verifying your identity and financial information to facilitate transactions with the PayStay service.
- Third party service providers such as data centre service providers, payment processing, data processing, communications, marketing providers to facilitate the purposes described within this document.
- Government agencies including the police and border protection when requested and legally permitted for the purposes of crime detection and prevention, or as otherwise legally required to do so.
- Providers of merchant acquiring services for the purposes of facilitating transactions by the PayStay service