

AUSTRALIAN PRIVACY PRINCIPLES-PRIVACY POLICY (Rev. 2014)

BACKGROUND

This is the privacy policy of Rêv Australia Pty Ltd ABN 91 117 378 953 Australian Financial Services licence 401610, referred to in this privacy policy as "**Rêv**", "**we**", "**us**" and "**our**". This privacy policy replaces all of our previous versions, which were last published in 2013.

We recognise the importance of protecting your personal information. We also believe it is important that you know how we treat the personal information we receive from you.

In dealing with your personal information, we are bound to comply with the *Privacy Act 1988* (the "Act"). We will protect your personal information in accordance with the Australian Privacy Principles which govern how we collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information.

WHAT IS PERSONAL INFORMATION?

In this privacy policy, "**personal information**" has the meaning given by the *Privacy Act 1988*. It means information or an opinion (whether true or not) and whether recorded in a material form or not about an individual whose identity is apparent or can be reasonably ascertained. Personal information can include your name, address, contact details and date of birth, which you provide to us when you request one of our products or services. We are legally required to confirm the identities of our customers and may therefore share personal information with independent third parties, to assist us in the verification process.

WHY DO WE COLLECT PERSONAL INFORMATION?

We may need to collect your personal information if it is relevant to our business relationship with you or a service or product that we are providing, or are involved in providing, to you.

The main reasons we may need to collect your personal information are to:

- find out whether you are eligible for a financial product or service; and
- provide a financial product or service to you; and
- undertake activities in relation to the provision of a financial product or service that we are undertaking on behalf of someone else (such as the issuer of a financial product that we are arranging, if we are not the issuer); and
- process or arrange for the processing of transactions relating to a financial product; and
- verify your identity and satisfy our obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*; and
- assist you if you have an enquiry, problem or complaint; and
- undertake research, training, product development and marketing; and
- carry out other purposes required or authorised by law.

DO WE COLLECT SENSITIVE INFORMATION?

We do not generally collect sensitive information about individuals unless required by law.

"**Sensitive information**" is defined in the *Privacy Act 1988* and includes information about race, political or religious beliefs, sexual preferences, criminal convictions and health information. We do not use or share sensitive information for any purpose or disclose it to any person other than in accordance with the terms of any consent that you provide to us or where we are required or authorised by law (including under the National Privacy Principles in the *Privacy Act 1988*) to do so.

HOW DO WE COLLECT PERSONAL INFORMATION?

Whenever it is reasonable and practicable to do so, we collect personal information about you directly from you. Occasionally, we may receive information about you from third parties, but if we do so we will use reasonable steps to inform you of who we are, the reason we are collecting your personal information and the consequences if we do not receive that personal information. We may also collect information from you electronically, when you visit our website or access your secure Account Centre to conduct transactions and view account details. For example, when consumers visit our website, they may do so anonymously. We aggregate these visits to determine information such as the date and time of visits; which pages are viewed; how users navigate through our website; and IP addresses. When you enter your secure Account Centre, we may collect transaction and personal information necessary to load your account, make purchases and conduct account maintenance.

If you contact us by phone, we may monitor or record phone calls for the purposes of the following. Recordings are securely stored electronically, in order to:

- making a record of what was said during the phone call; and
- staff training.

USE AND DISCLOSURE OF PERSONAL INFORMATION

We will only use your personal information for the reasons we collected it or for purposes set out in this policy. We make reasonable efforts to ensure that the information we collect, share and store is accurate and up to date.

Parties to whom we might disclose your personal information include:

- parties involved in the provision of a financial product or service to you – for example, product issuers, authorised representatives, our agents and representatives, card issuers, printers, postal services, card scheme operators (such as Visa and Mastercard), our complaints resolution scheme (the Financial Ombudsman Service) and other suppliers of goods or services to us; and
- our and your advisers, consultants and representatives (such as lawyers, accountants, auditors, financial advisers, debt collectors, attorneys, trustees and personal representatives); and
- parties involved in card and payments systems – for example, merchants, financial institutions and payments facilitators.

In addition, personal information may be shared between other entities in the group of related companies which includes Rêv and Rêv Worldwide, Inc. (our U.S. parent corporation) but where this occurs the principles contained in this policy will continue to apply to it. We may use personal information to send you information about other products and services, which may be of interest to you, but we respect your right to ask us not to do this. If you no longer wish to receive marketing communications from us, you should contact our Privacy Officer and we will ensure that they stop.

We may also disclose your personal information to third parties if:

- we are required by law or believe that we are required by law to disclose your personal information to a regulator or law enforcement agency in Australia or overseas – examples of regulators or agencies in Australia are the Australian Taxation Office (ATO), the Australian Transaction Reports and Analysis Centre (AUSTRAC) and the courts; or
- a crime or fraud is committed or suspected and it is in the public interest for us to disclose your personal information; or
- you have consented (either expressly or by inference from your conduct or the circumstances) to the disclosure.

We may send your personal information to our affiliate companies and external service providers outside Australia unless the law says we can't, but we will only do so if we are satisfied that the recipient of your personal information has adequate data protection arrangements as set forth by the Privacy Principles. This includes Rêv Worldwide, Inc. in the United States, call centre services in the US, New Zealand and the Philippines and if applicable, international parties required to process your international transactions. Circumstances in which we might send your personal information outside Australia include if:

- you request or consent to our doing so; or
- we have a contractor overseas who needs your personal information in order to carry out the function for which they are contracted; or
- it is necessary for the purpose of a transaction.

Any other use or disclosure we make of your personal information will only be as required by law or permitted by the *Privacy Act 1988*.

You can contact us without identifying yourself or by using a pseudonym, however, we will only be able to give you general product information, that is readily available on our product website(s). For your protection, we require that you provide and confirm certain personal information in order for us to discuss your transaction history or make changes to your account.

We will not sell your personal information to other organisations.

DATA QUALITY AND SECURITY

Much of the information we hold about you is stored electronically in secure data centres located in Australia and the United States. These data centres may be owned by us or external service providers. In either case, we employ a wide range of physical and electronic security measures to protect the security of the personal information we hold. For example, we will take all reasonable steps to:

- protect the information from misuse, loss or unauthorised access, modification or disclosure both physically and through computer security methods;
- limit access to information systems through identity and access management;
- require that employees be bound by internal information security policies to keep information secure;
- regularly monitor and review our compliance with internal policies and industry best practice; and
- destroy or permanently de-identify the information if it is no longer needed for any purpose or the *Privacy Act* retention time frames have been reached.

Although we take reasonable precautions to safeguard your personal information, because of the nature of the Internet, we cannot guarantee the safety of your personal information. Please contact us, if you become aware of any breach of security:

- Phone: 1300 725 796
- eMail: privacyAU@rev.zendesk.com

ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION

You are entitled to ask us to supply you with any personal information that we hold about you and if applicable, request correction(s). You must submit your request(s) in writing to the appropriate address as below:

Privacy Officer
Rêv Australia Pty Ltd
Suite 2, Level 16, 1 Martin Place
Sydney, NSW 2000

We will investigate and if applicable, delete any incorrect information or correct any errors in any of your personal information that come to our notice. You must include your current contact information with your notice, in the event our representative(s) need to reach you with questions or concerns.

Once we have received your complaint, we will investigate and respond to you as soon as we can. We try to do this within 10 working days of receiving your complaint. If this is not possible, we will contact you and let you know when we will respond to your complaint. We take all privacy complaints seriously and will deal with your complaint fairly and promptly. If, however, you are not satisfied with our response or how we handled your complaint, you may escalate, in writing, to the Office of the Australian Information Commissioner at:

GPO Box 5218
Sydney NSW 1042
Phone: 1300 363 992
TTY: 1800 620 241
eMail: privacy@privacy.gov.au

Additional Information on Privacy

For further information on Australian Privacy laws and how to file a formal inquiry or complaint, please visit the Australian Federal Privacy Commissioner's web site at www.privacy.gov.au