

Fiona Pay Privacy and Data Collection Policy

Your Privacy

We do not store any sensitive information such as your internet banking facility logon credentials. During a payment transaction, no one can access or see your internet banking logon credentials.

All communication via Fiona Pay takes place using high level security including Advanced Encryption Standard 256 bit encryption. All data will be stored on Australian servers. We may collect or use your personal information for the purposes set out in these Terms and by using Fiona Pay, you consent to this. We will not use your personal details for marketing or any promotional activities.

Information you provide. We collect the information you provide directly to us, such as the information you provide when you create a Fiona Pay account, update your personal information, fill out any of our online forms, register for email correspondence, request customer support, execute any online agreements or otherwise communicate with us. The types of information we collect from you may include, but is not limited to, your name, email address, address, phone number, driver's license, date of birth, taxpayer identification number, and any other information you choose to provide.

Information we collect when you use Fiona Pay. When you use Fiona Pay, we automatically collect information about you, including:

Log Information: We collect information when you use Fiona Pay, which includes, but is not limited to, the type of browser you use, access times, pages viewed, and your IP address.

Information Collected by Cookies and Other Tracking Technologies: We use various technologies to collect information when you use Fiona Pay, including cookies and web beacons. Cookies are small data files stored by your web browser, on your hard drive, or in device memory that help us improve Fiona Pay and your experience, determine usage of parts and features of Fiona Pay, and monitor for and detect potential harmful conduct. Web beacons are electronic images that may be used in Fiona Pay services or emails and help deliver cookies, count visits, and understand usage.

Information we collect from other sources. We may also collect information about you from other sources. For example, we may collect information about you from other organisations such as your financial institution and credit reporting agencies.

How We Use Your Information

Examples of how we use the information we collect include:

- To operate, improve, and develop Fiona Pay;
- To verify your identity;
- To send you notices, updates, security alerts, and administrative messages;
- To respond to your comments, questions, inquiries, and customer service requests;
- To communicate with you about products and services offered by Fiona Pay, and to provide and other information we think may be of interest to you;
- To monitor and analyze trends, usage, and activities in connection with Fiona Pay;
- To try to detect and prevent fraud, malicious activity, and other illegal activities;
- To protect the rights, privacy, safety, or property of Fiona Pay and others; and
- For any other purpose described to you when the information was collected.

How We Share Your Information

We may share information about you as follows:

- With our service providers, partners, contractors, including collection agencies in the event of a default;
- If we believe in good faith that disclosure is appropriate to comply with applicable law, regulation, or legal process (such as a court order or subpoena), including in connection with requests from law enforcement or other governmental authorities;
- If we believe your actions are inconsistent with our agreements or policies, or to protect the rights, privacy, safety, or property of Fiona Pay or others;
- Between Fiona Pay's associates and affiliates; and
- With your consent or at your direction.

We may also collect, use, and share aggregated or de-identified information, which cannot reasonably be used to identify you, for any purpose permitted under applicable law.

Data Collection and Use

Information you provide.

When you connect your financial accounts with a third party application, you may provide, through our integrated services, login information required by your financial institution to access your account, such as your username and password, answers to challenge questions, or a security token. When providing this information, you give the proprietor of the third party application, and Fiona Pay as its service provider, the authority to act on your behalf to access and transmit your information from the relevant financial institution.

Information collected from your financial institutions.

The information we receive from the financial institutions that maintain your financial accounts may vary depending on the specific Fiona Pay services our third parties use to power their applications, as well as the information made available by your financial institutions. The types of information we collect from your financial institutions may include, but are not limited to:

- Account information, including financial institution name, account name, account type, and account and routing number;
- Information about an account balance, including current and available balance;
- Information about credit accounts, including statement due dates and balances owed, payment amounts and dates, transaction history, and interest;
- Information about loan accounts, including due dates, balances, payment amounts and dates, interest, loan type, payment plan, and term;
- Information about the account owner(s), including name, email address, phone number, and address information.
- Information about account transactions, including amount, date, type, and a description of the transaction.

The data may include information from all your sub-accounts (e.g., checking, savings, and credit card) accessible through a single set of account credentials, even if only a single sub-account is designated by you.

Information received from your devices.

Our technology is embedded in our third parties applications. When you use your device to connect to our services through a third party application, we receive information about that device, including IP address, hardware model, operating system, and other technical information about the device. We may also use cookies or similar tracking technologies to collect usage statistics and to help us improve our services.

Information we receive about you from other sources.

We may receive information about you directly from third parties, including service providers and identity verification services and credit providers.

How We Use Your Information

We use the information we collect to operate, improve, and protect the services we provide to our developers, and to develop new services. More specifically, we use your information:

- To operate, provide, and maintain our services;
- To improve, enhance, modify, add to, and further develop our services;
- To protect you, our developers, our partners, or us from fraud, malicious activity, and other privacy and security-related concerns;
- To develop new services;
- To provide customer support to our developers, including to help respond to your inquiries related to our service or our developers' applications;
- To investigate any misuse of our service or our developers' applications, including violations of our Developer Policy, criminal activity, or other unauthorized access to our services; and
- For any other purpose with your consent.

How We Share and Store Your Information

We take deliberate steps designed to protect end user information in our possession. These steps include, but are not limited to, maintaining information security controls such as data encryption, firewalls, logical and physical access controls, and continuous monitoring. These controls are regularly evaluated for effectiveness against industry-standards internally and by independent security auditors.

We do not sell or rent end user information to marketers or other third parties. But we do share end user information with third parties as described in this Policy. For example, we share your information with the proprietor of the application you are using and as directed by them (such as with another third party if so directed by you). We may also share your information:

- With your consent;
- With our service providers, partners, or contractors in connection with the services they perform for us or our third parties;
- If we believe in good faith that disclosure is appropriate to comply with applicable law, regulation, or legal process (such as a court order or subpoena);
- In connection with a change in ownership or control of all or a part of our business (such as a merger, acquisition, reorganization, or bankruptcy);
- Between Fiona Pay and our affiliates and subsidiaries whether now or in the future; or
- As we believe reasonably appropriate to protect the rights, privacy, safety, or property of you, us and third parties we partner with.

We may collect, use, and share information we collect in an aggregated or de-identified manner (that does not identify you personally) for any purpose permitted under applicable law. This includes creating or using aggregated or de-identified data based on the information collected to develop services and to assist with research.

We retain information we collect about you for as long as necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted under applicable law, regulation, or contract. As permitted under applicable law, even after you stop using an application or terminate your account with our developers we may still retain your information (for example, if you still have an account with another developer or if there is residual information within our databases or systems); however, your information will only be used and shared as required by law or in accordance with this Policy.