



Privacy policy

Issued by Hay Limited

ABN 34 629 037 403

Australian financial services licence AFSL no. 515459

Hay® is a registered trade mark

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This Privacy Policy covers the Hay family. This includes Hay Group Limited and our group companies ("**Hay**", "**us**", "**we**" or "**our**").

By giving us your personal information, you agree to us collecting, using and disclosing your personal information in accordance with this Privacy Policy.

We understand that the privacy of your personal information is extremely important to you.

This Privacy Policy explains how we handle your personal and tax identifier information (we call this “personal information” in this document) so it’s important you read it carefully.

We will need to update this Privacy Policy as we evolve but we want you to know when we change it so you can make sure you continue to be ok with how we handle your information. We will tell you about changes via the Hay App.

What information is covered by this document?

This document applies to Personal information which is information that is reasonably identifiable. For example, this may include your name, email address and contact details.

01 What personal information do we collect?

The information we may collect from you includes:

- name, residential address, email address, date of birth, gender, telephone numbers;
- tax identifier (international only);
- details of your interactions with us;
- internet protocol address;





- location information;
- information about the type of device and operating system used by you;
- bank account details or debit card details;
- Driver Licence, Passport, Medicare number,
- any other relevant information that you give to us for the purpose of providing you with our products.

We may collect this information either directly from you or from other people. We may collect information when you:

- use the Hay App;
- visit our website;
- submit electronic forms with us;
- participate in an online chat or phone call with us; and
- otherwise correspond with us.

We may collect information about you from others such as:

- other companies in our group;
- third party suppliers and service providers in connection with providing our products; and
- public sources.

We may collect information about you, including where you are not our customer but are associated to a customer, from that customer, through fraud/ transaction monitoring systems implemented





by us or from publicly available sources such as registers maintained by the Australian Securities and Investments Commission and ABN Lookup or made available by third parties.

02 Why do we collect, use and disclose your personal information?

We may collect, hold, use and disclose your personal information:

- to provide our products;
- to send service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested;
- to send marketing and promotional messages;
- to identify and control or minimise risks to our services;
- to enable us to monitor suspicious or fraudulent activity in relation to our services;
- to provide information to our professional advisers to help us comply with legal, accounting, or security requirements;
- where we believe it is necessary to comply with, protect or enforce our legal rights, interests and the interests of others, including in connection with legal claims or disputes, compliance, regulatory and audit functions, prevention of fraud and ensuring data security;





- for any purpose you have consented to; and
- for any purpose related to the above.

You don't have to provide the personal information we request, however if you don't, we may not be able to provide you with the products or services you want us to provide.

03 Do we use your personal information for direct marketing?

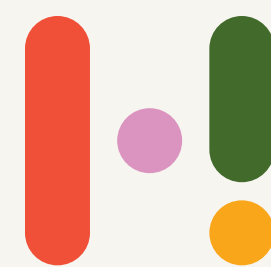
Yes. We may send you direct marketing communications and information about our services. This may take the form of emails, SMS, notifications or other forms of electronic communication. You can opt-out of receiving marketing from us by contacting us (see below) or by using the opt-out facility provided in Hay marketing emails.

04 To whom do we disclose your personal information?

We may disclose personal information for the purposes described earlier in this document to:

- our group companies;
- third party suppliers and service providers in connection with providing our products and services;
- payment systems operators;
- banks or other financial institutions;





- anyone who buys our business;
- specific people who you authorise to receive information we hold;
- government agencies, regulatory bodies and law enforcement agencies, or as required or permitted by law.

05 Do we disclose personal information outside Australia?

We may disclose personal information outside of Australia to our service providers who provide risk assessment and transaction monitoring (PEP's and sanctions checking) who are based in the United Kingdom and the United States of America. These providers include ComplyAdvantage and Twilio.

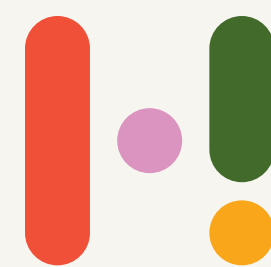
We will take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

06 Using our website and cookies

We may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.





We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences.

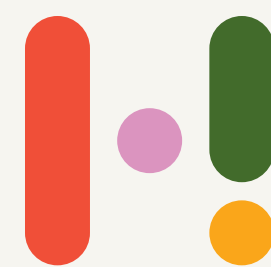
What are cookies? Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

07 How do we keep your information safe?

While we collect store card data for the purpose of payments and funding. All payment card information is stored by a compliant service provider. None of this information is stored by Hay.

We will hold your personal information in electronic form. We are committed to ensuring your personal information is safe and protected from accidental loss or alteration, inappropriate access, misuse or theft. We take reasonable steps to protect your information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. As well as technical, physical and organisational controls, we recognise that a well-trained, informed and security alert workforce minimises privacy risks from human error and/or threats from malicious actors.





For example we:

- train our staff about how to keep your information safe and secure;
- have firewalls, intrusion detection and virus scanning tools to stop viruses and unauthorised access to our systems;
- have building security measures in place;
- destroy and de-identify data when it is no longer required.

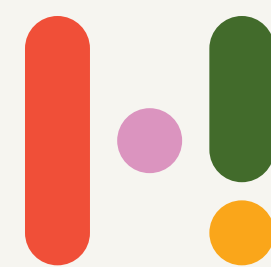
We require our service providers to implement appropriate industry standard security measures and only permit them to process your personal information for specified purposes in accordance with our contractual instructions.

However, we cannot guarantee the security of your information.

08 Links

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.





09 Accessing or correcting your information

You can access the personal information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your information.

You can also request confirmation from us as to whether we are processing your personal information.

If you think that any information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

You can also correct your personal information via the Hay App.

10 Do we disclose information to credit reporting bodies?

We do not disclose any of your information to credit reporting bodies.

11 Data retention

The period of time we keep your information will depend on the type of information we hold about you. Generally, your information will be retained while we have an ongoing relationship and for a period of 7 years afterwards, or such other period of time as required under specific legislation relating to the type of information held (for example under the Anti-Money Laundering and Terrorism-Financing Act 2006 (Cth)).





12 Making a complaint

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include key information about you so we can identify you and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

If you are not satisfied with how we have dealt with your complaint you can contact the Office of the Australian Information Commissioner using any of the following details:

1300 363 992

oaic.gov.au

GPO Box 5218, Sydney 2001, NSW

13 Contact us

For further information about our Privacy Policy or practices, or to access or correct your information, or make a complaint, please contact us using the details set out below:

PRIVACY OFFICER

1800 592 323

privacy@hay.co

P.O. Box 772, Surry Hills 2010, NSW



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