



# Privacy Policy

Australia

September 2019

## PRIVACY POLICY AUSTRALIA

Airwallex ('**Airwallex**', '**us**' or '**we**') is committed to protecting your data, privacy and financial details, in accordance with the data protection regulations of the jurisdictions within which we operate.

This policy sets out the basis on which we will process any Personal Information ('**Personal Data**') you provide us with, or that we collect from you. Please read it carefully to understand the types of information we collect, how we use it and the circumstances under which we will share it with third parties. By visiting our website ('**Website**', '**Platform**') you accept and consent to the practices described in this policy.

### **Collection and Use of Your Personal Data**

The information we receive and collect from prospects and customers is strictly related to the services we offer, provide and execute. It is used primarily to understand how you interact with the Platform, improve our Website, ensure content is presented in the most effective manner for you and your device, communicate essential information about Airwallex and its products, comply with legal and regulatory requirements, and drive marketing outreaches.

### **How do we collect information**

We collect Personal Information in three main ways:

1. **When you provide it directly to us**, by registering on our Website, filling in forms on our Platform and corresponding with us by phone, email and otherwise.
2. **Through trusted third parties**, such as business partners, sub-contractors, and organisations who provide us with verification information about you (e.g. banks or credit bureaus).
3. **Passively through technology**, such as "cookies" (see below) and analytics software used on our Website.

### **What information do we collect**

The Personal Information collected may include your name, email address and phone number, as well as your date of birth, address and financial (e.g. bank account) and credit card information.

We will also collect specific information and documents for identification purposes, as required by Anti-Money Laundering and Counter-Financing of Terrorism legislations (e.g. proof of address and certified copies of recognised identification).

We may in addition collect details regarding how you interact with our Website and App, such as the transactions you carry out via our Platform, technical information including your IP address, time-zone settings, browser versions and operating systems, as well as time spent on a page, clicks and download errors.

### **Cookies**

The [Digital Transformation Office](#) defines cookies as "small parcels of text-based data produced by the web server and exchanged with the user's browser each time they access

the website.” As with the information collected above, we use cookies to keep track of your activity and enhance your experience, and may also use them to fight fraud. You can disable cookies at any time by visiting the “settings” or “help” section of your browser.

If we inadvertently receive unsolicited personal information from you, and we determine that such information should not have been received, we shall, as soon as practicable, destroy the information, or ensure that the information is de-identified.

### **How Your Data is Stored**

All information you provide to us is stored on secure servers. These may be located outside of Australia, in locations such as Hong Kong, the United States and the United Kingdom.

### **Third Parties**

Airwallex does not sell or rent your Personal Data to third parties. However, there may be instances where some of that data will be disclosed to third parties in connection with the operation of our Platform and provision of our services. Such third parties include financial institutions, payment processors, agents, related bodies corporate in the United Kingdom and Hong Kong, contractors, verification services and credit bureaus, as well as any third parties that you have directly authorized to receive your Personal Information.

Some of these third parties are located outside of Australia, in locations such as the United States, Hong Kong and the United Kingdom.

We will also show your first name, last name and email to the recipients of invoices you issue through the Platform.

### **Marketing**

We may occasionally contact you with offers and information about new services. You can unsubscribe from these communications at any time by following the instructions at the end of all marketing emails and texts, or contacting us at [support@airwallex.com](mailto:support@airwallex.com).

However, you will continue to receive important communications regarding your account and your relationship with Airwallex. These will only be sent very occasionally and may include security updates or product enhancement information that could affect your use of the Platform.

We may in addition choose to work with advertising networks and provide them with non-personally identifiable data to select and serve relevant ads to you and others like you.

### **Security**

We take our security responsibilities very seriously and employ appropriate measures to ensure the confidentiality of all information required for the operation of our business.

Safeguards are reviewed regularly and include training staff regarding confidentiality and privacy issues, encrypting payment transactions with an RSA key and Secure Socket Layer (SSL) encryption, and restricting access to your Personal Information to those employees of Airwallex who have a business reason for knowing this information.

Whilst we take all reasonable steps to protect your data from misuse, interference and loss, as well as unauthorised access, modification or disclosure, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, any information that you provide to Airwallex is provided at your own risk.

### **Corrections and Complaints**

You can edit your account information at any time by logging in to our Platform with your Airwallex account.

For any questions, comments and complaints regarding this privacy policy, please email [support@airwallex.com](mailto:support@airwallex.com) and one of our customer representatives will get in touch. Alternatively, you may contact us at the following address:

Airwallex,  
Level 7/15 William St,  
Melbourne,  
VIC 3000,  
Australia.

### **Changes to the Privacy Policy**

We will review this policy regularly to ensure it is up to date and complies with the latest regulations. Changes will be posted on this page and you may be notified by email where appropriate. Please check back frequently to keep abreast of the latest updates.