



# Cruz Tech Privacy Policy

## About this policy

Cruz Tech is committed to ensuring the confidentiality and security of your personal information. This policy outlines why we need to collect personal information and how we manage the personal information we collect about individuals.

“Cruz Tech”, “Cruz”, “We”, “Us” refers to all staff, representatives and associated entities of Cruz Tech Pty Ltd, ABN 76 664 631 038 . “You” means an individual whose personal information we hold and “your” has a corresponding meaning.

We are bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) set out in Schedule 1 of the Privacy Act, in our handling of personal information. The Privacy Act protects ‘personal information’, which means ‘information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether the information is recorded in a material form or not’.

This Policy details our treatment of personal information that we gather including any personal information that we gather from you when you authorise us to gain the right to transfer money between bank accounts in real-time. We undertake to collect and handle your personal information in a lawful way, to respect your privacy and to be transparent about how we handle personal information.

## Collection of your personal information

We may collect personal information about you including:

- › identification and contact information, such as your name, address, phone number, email address, username and identification documents;
- › financial information, such as financial credentials, bank account information, transactional history, account balances and limits and other payment information;
- › customer service information, such as any messages you submit to us to enquire about Cruz Tech or request technical support; and
- › information on the IP addresses, devices and locations used to access Cruz Tech.

## How we collect personal information

We may collect personal information:

- › directly from you, when money is transferred to or from your account or when you contact us directly with any queries; or

- › from third party technologies and service providers that provide services enabling the operation of Cruz Tech, such as third parties providing identity verification services and payment technologies to enable Cruz Tech to facilitate financial transactions for you.

## **Use and purposes of personal information**

We may use personal information:

- › to operate and maintain the services provided by Cruz Tech, such as facilitating financial transactions on your behalf;
- › to provide you with the features, functions and benefits of Cruz Tech, such as displaying information regarding your financial accounts;
- › to verify your identity with third party service providers;
- › for internal purposes, such as tracking usage trends, developing and improving our services and performing research and analytics;
- › to provide you with notifications, email communications and to respond to your inquiries; and
- › to comply with our legal obligations towards our payment infrastructure providers, regulators and licence holders.

## **Disclosure of personal information**

We may disclose personal information:

- › to third party technologies and data processors, for the purpose of performing the services provided through Cruz Tech, for instance to provide us with identity verification checks and financial information;
- › to business partners and suppliers, for the purpose of performing the services provided through Cruz Tech; and
- › to third parties, as part of a sale or change of control of our business, for the purpose of ensuring that our business can be continued by the buyer or controller, as applicable.

We will not disclose personal information to overseas recipients.

## **Security of personal information**

We take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete, up to date and stored securely in cloud-based storage facilities in Australia, protected from misuse, interference, loss and unauthorised access.

## **Destruction of personal information**

We will delete or de-identify personal information held by Cruz Tech when it is no longer needed for the purposes for which we collect and use it or when you or a customer of Cruz Tech directs us to, unless a specified retention period is required to comply with applicable laws.

## **How you can access and update your personal information**

If you would like to access or seek correction of your personal information, please contact our Privacy Officer by emailing [privacy@cruz.tech](mailto:privacy@cruz.tech).

## **Notifiable Data Breach (NDB) Scheme**

As required by the NDB Scheme set out in the Privacy Act, if there is any loss, unauthorised access to or disclosure of your personal information that is likely to result in serious harm, we will investigate the breach and notify you and the Australian Information Commissioner as soon as practicable.

## **Complaints**

If you are not satisfied with how we have handled your personal information or this Policy, please contact our Privacy Officer in the first instance, by emailing [privacy@cruz.tech](mailto:privacy@cruz.tech).

Our Privacy Officer will seek to understand your concerns regarding our handling of your personal information and will discuss options to resolve your complaint and where appropriate, improve our information handling procedures.

If you are not satisfied with how we manage your complaint, the Privacy Commissioner at the Office of the Australian Information Commissioner (**OAIC**) may be able to help you. Visit the [OAIC website](https://www.oaic.gov.au) for more information, or you can phone the OAIC on 1300 363 992.

## **Privacy Policy Changes**

We may update this policy from time to time to provide additional notice as required by applicable laws. Please refer back to this Privacy Policy on a regular basis.

## **Contact information**

If you wish to access any personal information that we hold about you, or have any queries about this Policy, please contact our Privacy Officer by emailing [privacy@cruz.tech](mailto:privacy@cruz.tech).