

Cashrewards™ - Privacy Policy

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We value your trust and take the protection of your personal information very seriously. This Privacy Policy explains what personal information Cashrewards Operations Pty Limited ABN 72 150 888 136 (referred to in this policy as “**Cashrewards**”, “**we**” “**us**” or “**our**”) may collect and hold about you, how we may use and disclose this information and the steps we take to keep this information secure. Our commitment is that we:

- do not sell your personal information to any business, for any reason;
- do not use your personal information for any purpose other than described by this privacy policy or for any purpose which is not related to providing you the Cashrewards service; and
- maintain policies and practices to keep your personal information secure.

We may modify or amend this Privacy Policy from time to time and any such modifications or amendments become effective when published on our website. If we make any substantial changes to this Privacy Policy, we will display a notice on our website.

1. What kinds of personal information does Cashrewards collect and hold?

In this Privacy Policy, we refer to “**personal information**” which means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not. We may from time to time collect information (including personal information) about you. We may collect and process your personal information through your use of the Cashrewards service (including this website, a notifier and any app we make available), including any data you may provide in the sign-up process, by browsing or making a purchase via our website or app, entering a competition or engaging with us on our website, app or through emails you may receive from us.

The personal information that we collect and hold may include:

- **identity information**, such as your name and date of birth. Where we require you to provide evidence of your identity, including to verify your membership or membership activities, or as part of Know Your Customer checks, the types of documents we may request you to provide include a drivers licence, birth certificate, passport or where in relation to a member who is a company, a company constitution, partnership agreement or certificate of incorporation;

- **contact information**, such as your residential or postal address and postcode, contact details (e.g. mobile phone number), gender (where you elect to provide us), username and password;
- **financial information**, such as bank account or PayPal account details;
- **membership information**, such as customer reference numbers, Cashrewards membership number and information about any relationship you may have with other Cashrewards members (including other family members), merchants and other third party suppliers;
- **information about your preferences**, such as what membership benefits interest you most and what offers or other program benefits you have taken up, your preferred shopping preferences and the types of promotions that may interest you;
- **claims data** concerning a purchase made from a merchant as part of the process of raising and processing a rewards claim on your behalf (including order and invoicing data);
- **records of communications**, including customer service contact records of live chats, online tickets raised, emails and any other forms of contact with our customer service team;
- **transaction and usage data**, including information about online browsing behaviour and details of any products or services you have purchased from merchants through our website or app and the order reference for your transaction to allow us to track your shopping activity;
- **technical data**, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, equipment, browsing actions and patterns, operating system and platform and other technology on the devices you use to access Cashrewards; and
- **survey data**, from time to time we may collect other forms of personal information about you where you elect to respond to specific survey questions we send to you (e.g education, occupation, marital status or other background information).

We may also collect and hold other personal information that you choose to provide to us.

We also collect aggregated data such as statistical or demographic data from your use of the Cashrewards service. Aggregated data does not directly or indirectly reveal your

identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature.

2. How does Cashrewards collect my personal information?

We use different methods to collect your personal information as set out below. If we are not provided with all the Personal Information we request, we may not be able to provide to you the full benefits of being a Cashrewards member and the products and services that are of most interest to you. It is therefore important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Direct interactions.

We generally collect and record your personal information directly from you. You may give us your personal information when you complete online forms or by corresponding with us by email, phone or otherwise. This includes personal information you provide when you:

- complete a membership application to register to become a member of our Cashrewards service;
- make purchases or otherwise participate or take advantage of any benefits we offer;
- respond to any surveys, promotions or competitions held by us;
- subscribe to our offers;
- submit a claim or enquiry about a transaction via our website; or
- provide us with feedback through our contact forms.

Automated technologies or interactions.

When you interact with our website or emails you receive from us, we may automatically collect personal information about you, including technical data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites that employ our cookies. Please see our [Cookie Policy](#) for further details including how we collect information using cookies and how to change your preferences in relation to the use of cookies.

We may also collect information about your mobile device location which helps us tailor our service to you depending on your location, including to notify you of offers available in your general location. You can change your preferences for the types of mobile device location data we collect and how we use it in your mobile device and Cashrewards App settings.

Third parties

In order to facilitate the Cashrewards service, we need to receive personal information (including transactional and usage data) about you from the following third parties:

- affiliate networks;
- merchants featured on the website from time to time;
- program partners, being third parties who we agree to provide our program and other benefits to (or to their customers), where you choose to participate with them;
- suppliers, or service providers who assist us to provide the Cashrewards service to you;
- analytics providers such as Google and Facebook;
- fraud monitoring providers;
- social media or other third party accounts in order to facilitate sign up or sign in;
- technical monitoring and error reporting providers such as AWS Cloudwatch;
- contact and technical data from third parties that connect you to our website as a result of our marketing activities involving third parties; and
- financial and transactional data.

You consent to and authorise:

- affiliate networks, merchants and other program partners that we have relationships with, to share with us all transaction data held by them in connection with a qualifying transaction for the purpose of the Cashrewards service; and
- third party platforms you may use for creating and logging in to the Cashrewards Service (eg Google, Facebook) to send us information such as your name and email address as controlled by, and permitted in accordance with, the terms of that service.

3. How does Cashrewards hold my personal information?

We take reasonable steps to maintain the security and privacy of your personal information. This includes using encrypted 256-bit SSL connections on all of our web pages where you transmit personal information.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for or for the purposes of satisfying any fraud detection and

prevention, legal, accounting, or reporting obligations (including consistent with our record retention policies) we may have.

In some circumstances we may anonymise or de-identify your personal information (so that it can no longer reasonably identify you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

4. For what purposes does Cashrewards collect, hold, use and disclose personal information?

Purpose

We collect, hold, use and disclose your personal information primarily to perform our business activities and functions and in order to provide you with the benefits of being a member of the Cashrewards service, including to:

- meet our legal, accounting and reporting obligations, including as part of “know your customer” checks;
- operate, conduct and administer the Cashrewards service, including account management and fraud prevention and provide members with the benefits of the Cashrewards service including rewards and gift cards;
- identify our members, potential members and their representatives;
- confirm the eligibility of qualifying transactions and process and track transactions between:
 - you and us;
 - us and any merchants, program partners and other third party suppliers we have relationships with; or
 - you and any merchants, program partners and other third party suppliers we have relationships with;
- communicate with you as required for us to provide the Cashrewards service and our other services, including to provide verification or validation emails or account statements;
- personalise your experience with Cashrewards, including our offers, surveys and interest-based ads, and otherwise form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you;
- seek your opinion or comments about our benefits or services or those of third parties;

- take steps to ensure that our information is accurate, up to date, complete and where appropriate remains relevant to you;
- manage any complaints or enquiries you may have; and
- analyse, maintain and improve our Cashrewards service and its promotion to existing and potential members, including to facilitate promotion of Cashrewards and its partners (whether from Cashrewards to its members or from our partners to Cashrewards' members), better understand Cashrewards members and their characteristics and preferences, help us to understand and find existing and new target audiences, as well as for our own research and analytical purposes.

With respect to direct marketing, when you join the Cashrewards service you give us (and our partners) consent to send you information on ways to earn rewards, specific offers and commercial advertising and marketing messages in relation to our products and services and those of third parties that we believe you may be interested in. This is an optional part of the Cashrewards service. You may opt-out of (or unsubscribe from) receiving direct marketing messages by logging into the “Communications Preferences” sub-section of the “My Settings” section of the site or app and adjusting the marketing preferences or by following the opt-out links on any Cashrewards newsletters, emails, SMS or other marketing sent to you. The request to opt out (unsubscribe) may take up to 7 days to process. Please note, opting-out of receiving direct marketing messages will not affect any service-related messages which you may still receive from us.

We may otherwise collect, use, hold and disclose your personal information for purposes notified to you at the time of collection, or where permitted, required or authorised by law.

Persons to whom Cashrewards discloses personal information

Your personal information may be shared with merchants, program partners (including but not limited to partners where Cashrewards utilises their program, platform, mobile app, web app or other software to provide and promote the Cashrewards service) and other third party suppliers such as affiliate networks, technical, payment, fraud prevention and delivery service providers, for the purposes described in section 4 above, and to other persons as described in this privacy policy.

Aggregated basis

We may aggregate and de-identify personal information we hold relating to you and disclose it to third parties on an anonymised and aggregated basis, including for any useful general analytical purpose. When we disclose information on an aggregated basis, this means that the information of many members is combined together to form one measurement or quantity that cannot be used to identify any particular person. We

may disclose demographic and profile de-identified information to merchants, program partners and other third party suppliers, for example we may disclose that a certain number of our members live in a particular town or suburb, or that a certain proportion of our members have indicated an interest in sport, or that a particular advertising campaign will be received by members falling within a certain age range. From time to time we may also anonymise your personal information and disclose hashed information to our program partners in order to match that data against our program partner records for the purposes of aggregated analytics. In these cases, no personal information leaves our own systems and the program partner has no record of either the raw or hashed personal information.

Other disclosures

We may otherwise disclose your personal information where permitted, required or authorised by law.

Disclosure to recipients outside Australia

When you use the Cashrewards service, we may need to share your information with third parties, including merchants, customer service teams and service providers, who are located outside Australia, including in the Philippines.

5. How can you enquire about, access and correct the personal information Cashrewards hold about you?

Access

The information you provide us in your membership application and further information that you have supplied that is accessible by you in the My Account section of the Website includes personal information (such as your name, your email address, your residential or postal address, etc.).

Additionally, you have the right to request access to your personal information. However we are not required to provide this access in certain circumstances as described in the Privacy Act.

If you wish to access your personal information, have an enquiry about how your personal information is collected, used or disclosed or wish to request deletion of your personal information, please contact our Privacy Officer at: privacy@cashrewards.com or alternatively, you can write to us at:

Privacy Officer
Level 19, 242 Pitt Street
Sydney NSW 2000

Before we provide you with access to your personal information, we may require proof of identity and may charge a reasonable fee if your request requires substantial effort on our part.

Correction

If at any time you believe the personal information that we hold about you is inaccurate, incomplete or out-of-date, please let us know by contacting our Privacy Officer using the contact details listed above. We will use all reasonable efforts to correct the information.

Cancelling the collection, use or disclosure of your personal information

You may choose not to provide us with your personal information, or withdraw your consent to or otherwise cancel our collection, use or disclosure of your personal information at any time. You may also request us to delete your personal information. However, please note, if you do, we may not be able to provide our products or services to you, either to the same standard or at all. If you are a Cashrewards member this may require you to terminate your Cashrewards membership and your use of the Cashrewards service in accordance with our Terms of Use. We may continue to hold your personal information (a) for the purposes of satisfying any fraud detection and prevention, legal, accounting, or reporting obligations in accordance with section 3 of this privacy policy; and (b) in an aggregated and anonymized format.

6. How can you make a complaint about a breach of the Privacy Act or this Privacy Policy?

If you have a question or a complaint about this Privacy Policy or our handling of your personal information, please contact our Privacy Officer at privacy@cashrewards.com or alternatively, you can write to us at:

Privacy Officer
Level 19, 242 Pitt Street
Sydney NSW 2000

Our Privacy Officer will endeavour to respond to your request as soon as possible and will deal with any complaint with the aim of achieving a fair resolution.

Our Privacy Officer may request that you submit a complaint in writing and will promptly inform you in writing of the results of their investigations, including any steps that will be taken to address your concerns.

If you are not satisfied with our response, you may refer your complaint to the Office of the Australian Information Commissioner (**OAIC**) for further investigation, by email

at emailenquiries@oaic.gov.au or by visiting the website of the OAIC at www.oaic.gov.au.

7. Your use of third party websites

Our website contains links to other third party websites, including those of merchants with whom we have relationships. For example, sometimes you may be directed to a third party's web site where you may be asked to provide your personal information. It is your choice whether to provide your personal information to that third party. We are not responsible for the privacy practices of such third party websites. We encourage you to review the privacy policies of any third party websites you use.

8. Other information regarding this Privacy Policy

This Privacy Policy must be read in conjunction with any other terms and conditions that may govern our relationship including the terms and conditions set out at www.cashrewards.com.au/terms-and-conditions and our Cookie Policy www.cashrewards.com.au/cookies.

Further information about privacy and relevant laws may be obtained from the OAIC at www.oaic.gov.au or emailenquiries@oaic.gov.au.