

Privacy Policy

1. Overview

Mint has developed payments technology and processes to provide an efficient experience for our merchants and their customers. Mint aims to be at the forefront in the development of payments technology and processes in order to have a distinct advantage in the market and be the payments provider of choice in mis-understood industries.

It is critical that Mint develops and maintains robust processes and controls. Further, Mint requires robust remediation plans in the event of process errors.

As part of this we take protecting your privacy very seriously and this policy sets out the data we collect and the purposes for which it is used.

We understand the importance of being open and transparent with you in the way in which we collect, hold, store, use and share your personal information.

This document sets out our policies for managing your personal information and is referred to as our **Privacy Policy**.

2. Purpose

Mint Payments handles the personal information we collect about you in accordance with this Privacy Policy and our obligations under the:

- *Australian Privacy Act 1988 (Cth) (AU Privacy Act)*, including the *Australian Privacy Principles (APPs)*; and
- *New Zealand Privacy Act 2020 NZ (NZ Privacy Act)*, including the *Information Privacy Principles (IPPs)*; and
- other applicable laws.

We understand the importance of being open and transparent with you in the way in which we collect, hold, store, use and share your personal information. We take protecting your privacy very seriously.

We strongly encourage you read this document, so that you understand and are comfortable with how we handle your personal information. If you have any questions about this document, or about Mint Payments' handling of your personal information, please contact us using the relevant contact details set out in section 16.

3. Scope

This policy applies to all Mint management and staff and all Mint Group companies.

Mint Payments includes Mint Payments Limited (ACN 122 043 029) (**Mint Limited**) and its affiliates, subsidiaries and any other entity related to Mint Limited from time to time (**Mint Payments**).

4. Mint's Risk Appetite in Relation to Privacy

Mint is intolerant of any breaches of privacy in respect of our merchants, customers, employees, contractors and anyone we do business with.

Mint respects our merchants', employees' and business partners' personal and sensitive data and will treat such data safely and securely

5. About This Privacy Policy

In this Privacy Policy, "**we**", "**us**" and "**our**" refers to Mint Payments and "**you**" and "**your**" refers to any individual about whom we collect personal information.

This Privacy Policy sets out how we collect, store, process, use and disclose personal information (including personal information we collect, and personal information submitted to us, whether offline or online, for example through our portal).

Other terms and conditions may apply to you such as:

- the privacy terms and conditions contained in contractual arrangements we may have with you, including our General Terms and Conditions; and
- the collection notices and privacy statements which may be provided to you at the time your personal information is collected by us (for example a collection notice provided when you are being onboarded as a merchant).

6. What Is Personal Information And What Do We Collect?

"Personal information" is defined in the AU Privacy Act and NZ Privacy Act, and means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

In this Privacy Policy, whenever we use the term "personal information", we are referring to this legal definition. Personal information does not include aggregated or de-identified data.

In order to provide you with our end-to-end payments solutions (including our online and in-person products/ services), or to otherwise interact with us, Mint Payments may need to collect your personal information.

In summary, we may collect your personal information when you:

- fill out a merchant application form or otherwise apply to be a merchant;
- interact with us, for example via phone or online (including through our portals, website or our social media channels), or when you contact us with a query; or
- apply for a position with us.

Summary of personal information we collect and how we collect this information

The types of personal information we usually collect about you depends on who you are and your dealings with us. However, the table below sets out a summary of the personal information we generally collect and how we collect this information:

Who are we collecting personal information from?	What type of information may we collect?	How do we collect this information?
Merchants/ customers	<p>If you are a merchant, we may collect the following information:</p> <ul style="list-style-type: none"> • contact details including your name, address, email address, mobile and phone number; • date of birth; • your residential status; • certain government-related identifiers, including driver's license, passport and Medicare; • bank statements and ABN details; • credit card information and bank details; • Credit Information (as defined above); • your signature; • biometric data (including live video of your face) as part of our merchant verification and onboarding process; and • any other information we require in providing our products/ services to you. 	<p>We may collect your personal information directly from you, for example:</p> <ul style="list-style-type: none"> • during conversations with our staff members (in person or via phone); • via our portals, or when you fill out an application form; or • if you interact with us online, for example via email or to provide feedback or when you visit our website. <p>We may also collect your personal information about you from other people and organisations including (but not limited to); credit reporting bodies.</p>

<p>Job / work experience applicants</p>	<p>If you are applying to work with us, we may collect the following information:</p> <ul style="list-style-type: none"> • name and contact details; • date of birth and gender; • your Tax File Number; • information relating to your work history; • information about your education and qualifications and the institution you studied/ are studying at; • your working eligibility rights; • your suitability for the role you are applying for; • pre-employment medical assessment results; • biometric data (including live video of your face) as part of our verification and onboarding process; • work performance and training details; • superannuation fund details; • criminal history record; • credentialing information including licenses and registrations and accreditations; • emergency contact details; and • details about your referees. 	<p>We may collect this information if you apply for a position with Mint Payments (including if you are applying for work experience with us).</p>
<p>Credit Reporting Bodies and Credit Providers</p>	<p>We may collect information from Credit Reporting Bodies (including but not limited to Equifax Australia, Centrix and illion), or Credit Providers, who may include any of your personal information in reports to assist us with our assessment of your eligibility for our products and services.</p>	<p>We may collect this information before you are onboarded with us as a merchant and periodically whilst you are using our products and services to ensure your eligibility to use our products and services.</p>

<p>Other individuals</p>	<p>Depending on who you are (such as a supplier of goods and services to us or if you interact with our social media channels), we may collect:</p> <ul style="list-style-type: none"> • your name and contact details (including your business contact details, if applicable); • your work and business information (for example, your title and place of work); and • other information reasonably required by us to engage with you. 	<p>We may collect this information if you visit us, contact us or otherwise interact with us in person, online or via phone/ email.</p>
---------------------------------	---	---

We may also collect other types of information, which we have summarised below:

<p>Type of personal information</p>	<p>What this includes</p>	<p>How do we collect this information?</p>
<p>Online and digital services information (including behavioural information)</p>	<p>We may collect information from you electronically, which includes information such as your IP address, and details about your device.</p> <p>Please see section 11 for further information on the digital information we collect.</p>	<p>We may collect this information when you use our website or any online services, via use of online behavioural technologies, such as cookies.</p> <p>Please see section 11 for further information on the digital information we collect.</p>
<p>Call recording information</p>	<p>This may include the voice recording, time, date, number and name of individuals on the call.</p>	<p>We may collect this information in circumstances where we monitor and record our call with you, when we call you, or you call us. We will let you know if we are going to record call information.</p>
<p>Camera surveillance information</p>	<p>We may collect camera surveillance information which includes photographs or video recordings of you.</p>	<p>We may collect this information in circumstances where we use camera surveillance (e.g. CCTV) at our premises for the safety of our staff and any visitors to our offices.</p>

<p>Information required to be collected by law</p>	<p>We may collect information as required by law (for example, under anti-money laundering or anti-terrorism legislation).</p>	<p>We may collect this as required.</p>
<p>Publicly available online information</p>	<p>We may collect information that is publicly available online, such as on online forums, websites, and social media channels (for example, information that relates to a complaint).</p>	<p>We may collect this directly from the publicly available source (e.g. on the online forum, website, or social media channel).</p>

In some cases, you may provide us with personal information which relates to another person (for example, an emergency contact or a job referee). If you do so, you agree that you have received permission from these individuals for us to collect, use, and share, their personal information in accordance with this Privacy Policy.

You should also let them know about our Privacy Policy (including the information in this Privacy Policy).

Can you deal with us without providing your name?

Where possible and lawful, you may interact with us anonymously or using a fake name. For example, if you contact us with a general question or query, we will not record your name or other details unless we need it to adequately respond to your query.

However, for many of our functions and the services we provide, we need information about you including your financial information (e.g. bank details) as it may not be practicable for us to deal with you anonymously or pseudonymously on an ongoing basis when providing our products/ services.

If you provide incomplete or inaccurate information to us or withhold personal information from us, we may not be able to provide you with the products and services you are seeking.

7. Why Do We Collect, Store And Use Your Personal Information?

The primary purpose for which we collect your personal information (including Credit Information) will depend on who you are and your interaction with us, for example, if you are a merchant, job applicant, or a supplier of goods or services to us.

We have summarised the types of purposes for which we may collect your personal information:

Purpose	Explanation
<p>To provide you with our products/ services</p>	<p>We may collect, store and use your personal information to:</p> <ul style="list-style-type: none"> • provide you with our end-to-end payments solutions products and services; • to onboard a merchant and to identify and verify merchants or prospective merchants in accordance with our compliance obligations (e.g. anti-money laundering, anti-terrorism, KYC checks, Payments Card Industry Data Security Standard compliance, etc.); • to determine your eligibility to use our products and services; • to set up a customer's account in our portals and systems and for transaction/ payments validation; • respond to merchant requests and/ or complaints, and to action any transaction related queries; • manage our relationship with you, including to remind you when any services are due; • bill you or a third-party on your behalf for our services and submitting claims for the costs of our services; • improve our services, and your experience with us; and/or • otherwise effectively provide our products and services to you.
<p>To manage your working relationship with us (including when you are a contractor)</p>	<p>We may collect, store and use your personal information to assess your suitability for a position with us, and, if you successfully join us, to manage your working relationship with us, including for payroll purposes.</p> <p>We may collect, store and use your personal information for administration and management purposes.</p>
<p>To do business with you</p>	<p>We may collect, store and use your personal information about you if you interact with us on a commercial basis (such as if you are a service provider, contractor or supplier to us), or you otherwise interact with us on a commercial basis.</p>
<p>To manage and improve our operations and business</p>	<p>We may collect, store and use your personal information to:</p> <ul style="list-style-type: none"> • manage fees and administer billing (including administration of third-party payment arrangements) and debt recovery; • manage, monitor, plan and evaluate our services; • for our record-keeping and auditing purposes; • conduct safety and quality assurance and improvement activities, including quality control of our services and communications with you; • train staff (including admin and medical staff); • conduct research and development; • undertake risk and operational management processes;

	<ul style="list-style-type: none"> • test and maintain information technology systems; • investigate any incidents that may occur (both in relation to cyber security, as well as any health and safety incidents that occur at our premises); • handle and respond to any complaints made; and/or • assist with service development, to test the effectiveness and customer satisfaction of our products and services, improve the way we provide services to you, and for other quality assurance and compliance purposes.
<p>To create deidentified or aggregate data for data analytics activities</p>	<p>We may collect, store and use your personal information to create de-identified or aggregate data sets (which is no longer personal information). We do this by de-identifying or aggregating your information such as combining your information with information we have about our other customers, for example regarding purchasing trends, and with data we obtain from other sources. We use this de-identified or aggregate data to assist with our business decisions, such as to:</p> <ul style="list-style-type: none"> • help us in understanding trends in merchant behaviour (such as the success of our products and services); • improve the products and services we offer; and • develop new services that better meet our merchants' preferences and needs.
<p>To assist with any business, share sale or corporate restructure</p>	<p>We may collect, store and use your personal information for the purpose of considering, facilitating or implementing a transfer or sale of all or part of our assets or business or if we undergo any other kind of corporate restructure, acquisition or sale or proposal for any such transaction.</p>

8. Who Do We Share Your Personal Information To And Why?

We may share your information with third parties:

- for the reasons for which we collect, store and use that information (see above in **section** *Error! Reference source not found.*);
- for other purposes explained at the time we collect your personal information; or
- where we are otherwise allowed or required to do so under law.

Some of the third parties we may share your information with include the following:

Recipient	Explanation
<p>Mint Payments entities</p>	<p>We may share your personal information with Mint Payments entities in order to operate our business and provide services. For example, one member of Mint Payments provides shared services or back-end IT services to another member of Mint Payments.</p>

Credit Reporting Bodies and Credit Providers	<p>As a merchant, we may share your personal information with our payment partners, data source providers, and credit reporting bodies for the purposes of credit assessment and to assess your eligibility for our products and services.</p> <p>We may disclose information to or collect information from Credit Reporting Bodies (including but not limited to Equifax Australia, Centrix and illion), who may include any of your personal or Credit Information in reports to assist us with our assessment of your eligibility for our Services.</p>
Our service providers and advisors	<p>We may share your personal information with a variety of our service providers to assist us with providing and managing our services. These may include:</p> <ul style="list-style-type: none"> • payment service providers, such as Stripe to create your account and onboard you, and to facilitate the provision of our products and services to you; • third-parties that undertake KYC and identity verification checks; • IT service providers and third party storage providers; • data analysis organisations; • external auditors; and • professional advisors and consultants (such as legal, insurance and financial advisors).
Corporate restructure	<p>We may share your personal information with third parties, whether affiliated or unaffiliated, or acquiring partners for the purpose of facilitating or implementing a transfer or sale of all or part of our assets or business or if we undergo any other kind of corporate restructure, acquisition or sale. In this context, your personal information may be transferred to another entity (or if such a sale, transfer, acquisition or corporate restructure is being contemplated by us).</p>
Government and law enforcement agencies	<p>We are sometimes required by certain Commonwealth, State or Territory legislation to report certain personal information to government agencies, regulatory bodies and law enforcement agencies, for use in the prevention or detection of fraud or other criminal activity.</p>

9. Do We Share Your Personal Information Overseas?

We generally collect your personal information in Australia or New Zealand. However, some of the organisations we may disclose your personal information to are located overseas in Germany. These recipients include our service providers who may handle, process or store your personal information on our behalf.

For example, we may share your personal information with service providers who assist us with storing our data on secure data storage servers, or with improving our services (by analysing data, and conducting patient satisfaction enquiries).

We only ever share your personal information outside of Australia and New Zealand where we are permitted to do so under the AU Privacy Act, NZ Privacy Act and other applicable

privacy laws. Generally, this means we will take reasonable steps to ensure your personal information is treated securely and in accordance with applicable privacy laws.

There are other circumstances where we may disclose your personal information to an overseas recipient. For example, where you have provided your consent or we are otherwise permitted to do so under other relevant laws.

10. Do We Use Or Share Your Personal Information For Direct Marketing?

When you provide your personal information to Mint Payments, we may use that personal information to send you direct marketing communications to keep you informed about products and services offered by Mint Payments which we think might be of interest to you based on your interactions with us.

We may contact you from time to time, whether by phone, SMS, email or post, to provide you with information regarding our products and services, events, promotions and opportunities, or to ask you for your feedback through surveys on how you found our products and services.

We will only send these communications in accordance with applicable privacy and marketing laws, and only where you have not opted out from receiving such communications from Mint Payments.

If you have indicated a preference for a method of communication, we will endeavour to use that method, wherever practical to do so.

How can you opt out?

You are always in control of the direct marketing communications which you receive and can opt-out at any time. Generally, you can opt-out by following the relevant opt-out or unsubscribe instructions in the relevant communication (such as email or SMS message).

You can also contact us using the detail set out in **section 16** to tell us you would like to stop receiving direct marketing communications from us.

Important points regarding opting out

Importantly, regardless of whether you opt out from receiving any or all direct marketing communications, we will still communicate with you if we are required by law to provide you with information, or in relation to the products and services we are providing you with (for example, sending you an invoice in relation to a provided product or service).

11. How We Interact With You Via The Internet

Third party links and sites

When you use our websites or receive communications from us, links to websites which belong to other third parties may be included (and are provided for your convenience). You should make your own enquiries as to the privacy policies of these parties. We are not responsible for information on, or the privacy practices of, any third party websites.

Website use and cookies

You may visit our websites without identifying yourself. If you identify yourself (for example, by making an enquiry), any personal information you provide to us will be managed in accordance with this Privacy Policy.

Our websites also use cookies (and we may share personal information we collect between members of Mint Payments). A 'cookie' is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, "click-through" information, IP address, pages you have accessed on our websites and on third-party websites. Depending on the circumstances, this may or may not be personal information.

At a high level, cookies can be used for a variety of reasons, such as to personalise your browsing experience (for example, by remembering your preferences and recognising you as a repeat visitor to our websites), and to track statistics about the usage of our website. This allows us to better understand our users and improve the layout and functionality of our websites.

If you do not wish to receive any cookies (other than those that are strictly necessary) you can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our websites.

12. How We Store And Protect Your Personal Information.

We are committed to protecting your personal information, and ensuring that we securely store any personal information we collect (and in accordance with applicable privacy laws). We may hold your personal information in hard copy (paper) or electronic form.

We take all reasonable steps to ensure that any personal information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment protected from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Security and storage of personal information

Form	Explanation
Paper-based files	<p>We sometimes store personal information in paper-based files in secure storage (generally at our offices). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed).</p> <p>We maintain physical security measures to ensure that personal information in paper-based files is protected, such as security systems at our premises.</p>
Electronic records	<p>We store electronic records in restricted access document management systems (e.g. OneDrive) and secure databases, using trusted third party storage providers based in [insert]. We also maintain physical security measures in relation to storage of our electronic records (such as through locks and security systems at our electronic data stores).</p> <p>Using technical methods, we also maintain computer and network security. For example, we have access restrictions in place in relation to our document management system, all information is encrypted at rest and in flight and we conduct regular monitoring of our systems for any suspicious activity, including security penetration testing.</p>
Our websites (including for making payments)	<p>Our websites use encryption or other technologies to ensure that your personal information is securely transmitted via the internet (including to protect any payments you make).</p> <p>We encourage you to exercise care when sending your personal information via the internet.</p>

How long do we keep your personal information?

We will only keep your personal information we store for as long as is necessary for the purposes set out in this Privacy Policy or as required to comply with any applicable legal obligations.

When we no longer require your personal information (and in accordance with any applicable laws), we will take steps to delete, destroy or de-identify that information.

13. Can I Access Or Correct My Personal Information?

You are entitled to request access to any of your personal information that we have. To make such a request, please contact us using the relevant contact details set out below in **section 16**.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and informing us of any change in your personal details (for example, if your email address changes).

If you consider any personal information we have about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you are also entitled to request correction of the information (again, please contact us). After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your information in certain circumstances in accordance with the applicable privacy laws. If we do refuse your request, we will provide you with a reason for our decision. In addition, in the case we refuse your request for correction, we will include a statement about your request with the personal information we store.

14. How Do I Make A Complaint About The Handling Of My Personal Information?

If you have any questions or concerns about this Privacy Policy or how we have handled your personal information, you may contact us at any time using the relevant contact details set out below in **section 16**.

Please also contact us if you have a complaint about privacy. If you make a complaint about privacy, the following will occur:

No.	Step
1.	We will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally acknowledge your complaint within a week.
2.	If your complaint requires more detailed consideration or investigation: <ul style="list-style-type: none"> we will aim to acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly; and we may ask you to provide further information about your complaint and the outcome you are seeking.
3.	We will then typically gather relevant facts, locate and review relevant documents and speak with the individuals involved.
4.	In most cases, we will respond to your complaint within 30 business days from when we receive your complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to a complaint, or you consider that we may have breached the AU Privacy Act or NZ Privacy Act (including the Australian Privacy Principles/ Information Privacy Principles), you are entitled to make a complaint to the

Office of the Australian Information Commissioner (the Australian privacy regulator) or the Office of the Privacy Commissioner (New Zealand Regulator).

If you are based in Australia and you are not satisfied with our response to your complaint, the Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992, or you can fill out this [form](#) to make a complaint about our handling of your personal information. Full contact details for the Office of the Australian Information Commissioner can be found online at www.oaic.gov.au.

If you are based in New Zealand and you are not satisfied with our response to your complaint, a complaint can be made to the Office of the Privacy Commissioner by telephone on 0800 803 909 or by filing a complaint [online](#) about our handling of your personal information. Full contact details for the Office of the Privacy Commissioner can be found online at www.privacy.org.nz/.

15. How Are Changes Made To This Privacy Policy?

We may make changes to this Privacy Policy, with or without notice to you. However, where we make a material change to the Privacy Policy, we will provide notice to you (including by updating our websites, and, where appropriate, notifying you directly). We recommend you visit this Privacy Policy regularly to keep you up to date with any changes we make.

16. How Can We Be Contacted?

You can contact us using the details below:

Mint Payments	
Phone	1300 646 833 or +61 (2) 8752 7888
Email	The Privacy Officer Mint Payments Limited (ACN 122 043 029) support@mintpayments.com or privacy@mintpayments.com.au
Postal address	Suite 1, Level 8/10 Bridge Street, Sydney NSW 2000

17. Distribution

This policy is to be made available to all Mint staff. Any specific protocols, requirements and processes will be incorporated in the Staff Code of Conduct and subsidiary policies.

18. Policy Version History

Version	Date	Description	Approved By
1.0	May 2024	Final Privacy Policy	Board