

## Privacy Policy

WebGate Technologies Pty Ltd ACN 151 377 954 trading as WebDosh (“WebDosh”, “we”, “us” or “our”) may collect and hold information or opinions which identifies users of our services (“**personal information**”) from time to time. We may collect personal information whether or not it is true and whether or not it is recorded in a material form.

The kind of personal information that we collect and hold may differ depending upon which services you use.

### 1. COLLECTION OF INFORMATION

We will where possible, collect your personal information directly from you, unless it is unreasonable or impracticable for us to do so. If we collect your personal information from another person and it is unclear that you have consented to the disclosure of that information to us or that information is otherwise not permitted to be disclosed to us, we will, whenever reasonably possible, make you aware that we have done this and the reasons for doing so.

To use the WebDosh Payment Gateway and our related goods and services, we require information relating to your Internet Merchant Facility (including your Merchant Number, Terminal ID and/or Settlement Account, depending on your merchant bank), Company Details, Contact Details, and Payment Details. Company details may include your company name, website, email address, type of business and ABN. Contact details may include your name, email address, telephone number and address. Payment details may include credit card details and/or direct debit details. All correspondence may also be collected and stored, particularly regarding sales, support and accounts, including email. Any information collected by WebDosh is collected via correspondence from you or your company. This may be via the telephone, email, through our online applications or directly through our website.

We may from time to time collect and hold personal information about how you use our services, such as the frequency and duration of your activities, so that we can fine tune our services better to meet your apparent needs.

### 2. USE OF COLLECTION INFORMATION

Any Internet Merchant Facility, Company Details, Contact Details, and Payment Details collected from WebDosh customers is required to provide you with our payment gateway product. Correspondence is recorded to provide service references, and to assist in our staff development. How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are specific purposes for which we use the information we collect about you.

- **To provide the Services and personalize your experience:** We use information about you to provide the Services to you and your users, including to process transactions with you, authenticate you when you log in, provide customer support, and operate, maintain, and improve the Services.
- **To communicate with you about the Services:** We use your or your clients contact information to send transactional communications via email and within the Services, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. We send you email notifications when you or others interact with you on the Services.
- **Customer support:** We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyse information, and to update, repair and improve the Services.

- **For safety and security:** We use information about you and your Service use to verify accounts and activity, to detect, prevent, and respond to potential or actual security incidents and to monitor and protect against other malicious, deceptive, fraudulent or illegal activity, including violations of Service policies.
- **To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions
- **Legal bases for processing (for EEA users):** If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:
  - We need it to provide you the Services, including to operate the Services, provide customer support and personalised features and to protect the safety and security of the Services;
  - It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
  - You give us consent to do so for a specific purpose; or
  - We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

- **Managed accounts and administrators:** If you register or access the Services using an email address with a domain that is owned by your employer or organisation or associate that email address with your existing account, and such organisation wishes to establish an account or site, certain information about you including your name, profile picture, contact info, content and past use of your account may become accessible to that organisation's administrator and other Service users sharing the same domain. If you are an administrator for a particular site or group of users within the Services, we may share your contact information with current or past Service users, for the purpose of facilitating Service-related requests

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

We may disclose your personal information to overseas recipients for any of the reasons outlined above.

All information (aside from credit card numbers as specified above) will be stored by Amazon Web Services (AWS). Please visit the AWS site at <https://aws.amazon.com/privacy/> to learn more about how they collect and use this information.

While we cannot guarantee overseas recipients will comply with Australian laws, we will take the necessary steps in the circumstances to ensure that those overseas recipients do not breach the Australian Privacy Principles.

### 3.COOKIES

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use cookies on this site. We do not link the information we store in cookies to any personally identifiable information you submit while on our site. We use session cookies to make it easier for you to navigate our site. A session ID cookie expires when you close your browser. Persistent cookies may be used for affiliate registrations, analytics and other similar purposes. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file. We use cookies in the following ways:

- When you register for any of WebDosh's services, we use cookies to make it easier for you to navigate through and complete the registration form.
- When you login to your WebDosh Dashboard we use cookies to easily authorise your credentials as you navigate through our secure pages.
- If you reject cookies, you may still use our site, but your ability to use some areas of our site, such as our administration area, may be limited.
- Some of our business partners (e.g. advertisers) use cookies on our site. We have no access to, or control over, these cookies.

This privacy statement covers the use of cookies by this site only and does not cover the use of cookies by any advertisers.

### 4.APPLICATION INFORMATION

During the WebDosh application process you may be required to give contact information (such as name and email address). We may use this information to contact you about the services on our site in which you have expressed interest. You may also be requested to provide company demographic information (such as industry type and business size (if applicable)) to us; this information is requested so we can provide you with a more personalised experience on our site. Web Gate Technologies Pty Ltd is the sole owner of the information collected on [www.WebDosh.com](http://www.WebDosh.com). WebDosh collects personally identifiable information from our users at several different points on our website.

### 5.ORDERS

If you purchase a product or service from us, we may request certain personally identifiable information from you on our order form. You must provide contact information (such as name, email, and postal address) and financial information (such as credit card number, and expiration date). We use this information for billing purposes, and to fill your orders. If we have trouble processing an order, we will use this information to contact you.

### 6.COMMUNICATIONS

WebDosh uses personally identifiable information for essential communications, such as confirmation emails, accounts information, and critical service details. We may also use this information for other purposes, including some promotional emails. If at any time a customer wishes not to receive such correspondence, they can request to be removed from any mailing lists by emailing us at [legal@WebDosh.com](mailto:legal@WebDosh.com). You will be notified when your personal information is collected by any third party that is not our agent/service provider, so you can make an informed choice as to share your information with that party.

### 7.THIRD PARTIES

We use other third parties to provide the essential links between the merchants, the banks and ourselves in order to provide credit card payment gateway services on our site. These

third parties are prohibited from using your personally identifiable information for any other purpose. WebDosh does not share any information with third parties for any unknown or unrelated uses.

## 8.LEGAL

We reserve the right to disclose your personally identifiable information as required by law and when we believe that such disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on our website.

## 9.TESTIMONIALS

We may post customer testimonials on our website which may contain personally identifiable information such as the customer's name. We do obtain the customer's consent prior to posting the testimonial to post their name along with their testimonial. If at any time the customer feels that they no longer wish to have their testimonial posted on our website, they can request for it to be removed by emailing us at [legal@WebDosh.com](mailto:legal@WebDosh.com).

## 10.AFFILIATE PARTNER PROGRAM

WebDosh provides free-of-charge a directory for affiliate partners to join and connect with each other. This is a process completed entirely by you as a WebDosh partner. All information submitted by you into the affiliate program is only available to other members. If at any time the affiliate partner feels that they no longer wish to be a part of this program, they can request to be removed by emailing us at [legal@WebDosh.com](mailto:legal@WebDosh.com).

## 11. LINKS

There are many links on the WebDosh website to external entities. The terms and conditions set out in this privacy statement only covers the domain name of [www.WebDosh.com](http://www.WebDosh.com). We are not responsible for the content contained in the links or how the links may access, collect or use your personal information.

## 12.STORAGE OF COLLECTED INFORMATION

The security of your personal information is important to us. Your personal information is primarily stored by electronic means. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference, loss and unauthorised access, modification and disclosure.

When you enter sensitive information (such as credit card number or social security number) on our registration or order forms, we encrypt that information using secure socket layer technology (SSL).We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. If you have any questions about security on our Website, you can email us at [legal@WebDosh.com](mailto:legal@WebDosh.com).

## 13. ACCESS TO AND CORRECTIONS OF YOUR PERSONAL INFORMATION

Upon your request, we will provide you with access to your personal information we hold if it is reasonably practicable to do so, within a reasonable period after your request is made.

Notwithstanding, we retain the right to deny access to your personal information to the extent that:

- (a) we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- (b) giving access would have an unreasonable impact on the privacy of other individuals;
- (c) the request for access is frivolous or vexatious;
- (d) the information relates to existing or anticipated legal proceedings between us or our related entities and the individual, and would not be accessible by the process of discovery in those proceedings;
- (e) giving access would reveal our intentions in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- (f) giving access would be unlawful;
- (g) denying access is required or authorised by or under an Australian law or a court/tribunal order;
- (h) both of the following apply:
  - i. we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in; and
  - ii. giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
- (i) giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- (j) giving access would reveal evaluative information generated within the entity in connection with a commercially sensitive decision-making process.

We will make corrections to personal information we hold about you, if:

- (a) we are satisfied that, having regard to a purpose for which the information is held, the information is inaccurate, out of date, incomplete, irrelevant or misleading; or
- (b) you request us to correct the information.

Within a reasonable period following the situations set out above, we will take such steps (if any) as are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

#### 14. DATA BREACHES

If we suspect that a data breach has occurred, we will undertake an assessment into the circumstances of the suspected breach within 30 days after the suspected breach has occurred. Where it is ascertained that a breach has actually occurred and where required by law, we will notify the Office of the Australian Information Commissioner and affected customers as soon as practicable after becoming aware that a data breach has occurred.

## **HOW TO CONTACT US**

If you have a problem, complaint or wish to enquire about our Privacy Policy, please contact us using the below contact details.

We will respond to your complaint in accordance with the relevant provisions of the Privacy Act 1988 (Cth) as soon as practicable. We treat complaints relating to privacy very seriously. If you submit a concern or complaint, we will endeavour to deal with it comprehensively and reach an outcome where all parties are satisfied.

If you are not satisfied with our response to your complaint, or if you would like further information about privacy in Australia, then we suggest you contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

### **Our contact details**

*The Privacy Officer*

*PO Box 7848*

*East Brisbane Qld 4169*

*0417 003 660*

[privacy@webgatetec.com](mailto:privacy@webgatetec.com)

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