

Our Privacy Commitment

Keycorp respects the privacy of every person that contacts our company or is associated with the services that we provide to our customers. Our Privacy Policy outlines the information that we collect and how we use that information. This Policy provides advice on how to verify the accuracy of the personal information submitted to us and how to request that we either update the information or delete the information if it is no longer required.

We have developed our privacy policy with reference to the requirements of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 as well as best practice industry guidelines and practices. All privacy practices and methods described herein only apply insofar as permitted by law.

Keycorp is committed to protecting and safeguarding the privacy of personal information and we take seriously the trust placed in us. Our commitment is to provide excellence in customer service and view adherence to our Privacy Policy as fundamental to meeting this objective.

Privacy Policy Guiding Principles

The primary purpose of Keycorp is to provide market leading payment technology services to our customers and to their customers. The collection and maintenance of personal information relates specifically to this primary purpose. We respect the privacy of every person that contacts our company or is associated with the services that we provide.

The guiding principles that govern our practices in relation to the privacy of personal information are summarised as follows:

- The management of any personal information will be conducted in an open and transparent manner.
- Personal information is the property of the individual and an individual can have access to their personal information.
- Where practical, Keycorp will provide the option of an individual remaining anonymous.
- We will only collect and use personal information for the intended purpose of providing excellence in payment technology services and support solutions.
- We collect personal information directly from our customers and do not collect information whether direct, indirect or unsolicited from other sources.
- We do not collect sensitive information unless required to do so by law.
- We do not sell or use for direct marketing purposes personal information and we will not disclose personal information unless consent has been provided.
- In the normal course of our business, we do not require any personal information to be disclosed to someone in a foreign country.
- We will not use an identifier that has been provided by a Government agency.
- We will strive to ensure the accuracy of personal information collected.
- We are committed to keeping personal information secure.
- Upon request, we will provide access to an individual's personal information insofar as permitted by law.
- We will amend personal information if such an amendment is for the purpose of providing technical and support solutions.
- We are committed to resolving any issues or complaints in a fair, reasonable and expedient manner.
- All privacy guidelines, practices and methods apply insofar as permitted by law.

Access to details of Keycorp's Privacy Policy or issues related to personal information can be made by an initial contact to Keycorp via telephone on + 61 3 9403 1777, via fax on +61 3 9403 1688, via email on info@keycorp.net or via mail at Post Office Box 8198, Northland Centre, Preston, Victoria 3072.

Privacy Policy

We have developed our privacy policy with reference to the requirements of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 as well as best practice industry guidelines and practices. All privacy practices and methods described herein only apply insofar as permitted by law.

The information contained in this document details how we comply with the requirements of the Privacy Amendment Act in protecting the personal information we hold about you. In addition, confidentiality of information is an integral requirement for Keycorp to deliver our services to our customers in a trusted manner.

Openness and transparency

- Keycorp respects the privacy of every person that contacts our company or is associated with the services that we provide to our customers. We have developed our privacy policy with reference to the requirements of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 as well as best practice industry guidelines and practices. All privacy practices and methods described herein only apply insofar as permitted by law.
- Keycorp adopts the policy that personal information is the property of the individual and that an individual can seek to have access to that information in a convenient manner. Upon notification, Keycorp will advise how and where to access personal information.
- Access to details of Keycorp's Privacy Policy or issues related to personal information can be made by an initial contact to Keycorp via telephone on + 61 3 9403 1777, via fax on +61 3 9403 1688, via email on info@keycorp.net or via mail at Post Office Box 8198, Northland Centre, Preston, Victoria 3072.

Anonymity

- Where practical, Keycorp will provide the option of an individual remaining anonymous. However, it is unlikely that Keycorp will be able to provide effective support services should anonymity be required.

Collection of personal information

- Keycorp's primary goal in collecting personal information is to enable us to deliver effective payment technology and support services to our customers and to their customers. Personal information enables us to customise our services to provide a meaningful and enjoyable experience to our customers.
- Our staff and subcontracted parties will, only use personal information received, towards the provision of technical services including support. If a person chooses not to provide us with personal information, then we may be unable to effectively discharge our obligations. In particular, prompt efficient service will be compromised if relevant personal details, such as contact details, are not available.
- Keycorp collects personal information directly from our customers where we are contracted to provide support services. Keycorp will not collect personal information unless it has been provided to us voluntarily, either direct from the end user customer, or from our direct customers that have sought consent from their direct customers.
- In some cases, Keycorp through the normal course of business activities, assembles information that is not completely necessary for the discharge of its functions. In such instances, Keycorp where practicable, will take steps to de-identify the personal information that is not required and retain that personal information that is necessary only for the efficient discharge of its duties.
- Keycorp does not collect sensitive information during the normal course of conducting business unless required by law. Sensitive Information includes information about an individual's: racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual preferences or practices; criminal record or health.

Unsolicited personal information

- Keycorp collects personal information directly from our customers where we are contracted to provide support services. We do not collect unsolicited personal information from any source, including information from marketing companies, marketing lists or cookies.
- In the unlikely event that Keycorp receives unsolicited personal information about an individual that is not directly related to the services we provide; we will as soon as is practicable destroy or ensure the information is deidentified.

Notification of collection of personal information

- In most cases, personal information provided by our customers is collected so that we can provide services on their behalf directly to you. We will take reasonable steps to let you know that we have your personal information and the intended purposes for which the information is required, unless it is obvious from the circumstances that you know or expect us to have the information.

Use and disclosure:

- Keycorp's primary goal in collecting personal information is to enable us to deliver effective payment technology and support services to our customers.
- We may also use the personal information to improve our services; to deliver information relevant to payment products and services; to respond to requests for information and service and to make contact if needed in the course of processing of product or service orders.
- Keycorp will disclose personal information to sub-contracted third parties only where that information is required to perform the service. Information disclosed to third parties, will be on a needs to know and on a minimum basis. These third parties, whether they are agents, contractors or partners, are restricted from using this data in any way other than to provide services to, or on behalf of Keycorp.
- In all instances, Keycorp's ability to limit disclosure of personal information will be limited to any law that compels disclosure, whether that law requires information be disclosed or access to that information be restricted.

Direct marketing

- Keycorp does not engage, use or disclose personal information for the purposes of direct marketing and we will not sell personal information to any other organisation without the consent of the individual concerned.

Cross-border information

- During the normal course of conducting business, Keycorp does not require personal information to be disclosed to someone in a foreign country. In the unlikely event that such disclosure is required, Keycorp will take reasonable steps to ensure that the information is kept confidential and is not used for any other purpose than the primary purpose of providing payment technology services.

Government related identifiers

- Keycorp does not adopt as its own a record an identifier that has been assigned by a Commonwealth agency. For the avoidance of doubt, an individual's name or Australian Business Number (ABN) is not considered an identifier.

Quality of personal information

- Keycorp will strive to ensure accuracy of information held within the organisation. In particular, Keycorp will use reasonable endeavours to ensure accuracy and completeness of personal information at the point of collection of information.
- Keycorp's obligation in relation to accuracy of personal information is limited to our knowledge of whether the information is accurate at point of collection or whether there have been changes to the information subsequent to the initial collection of information.
- Despite the practical limitations in relation to maintaining accuracy of personal information, Keycorp will take active steps to maintain data accuracy such as requesting individuals to advise if their circumstances have changed. In most instances, Keycorp will update records relating to personal information upon receipt and validation of request to amend records.

Security of personal information

- Keycorp is committed to keeping personal information secure and will take reasonable measures to protect that information from loss, misuse, alteration or unauthorised access. Agents, contractors or partners of Keycorp are required to keep the information confidential and are not permitted to use this information for any purpose other than the primary purpose of providing payment technology and support services.
- Reasonable steps will be taken to avoid transmitting personal information across public networks, by fax, e-mail or other unsecured mediums, especially if the transaction is in plain text or includes sensitive information. Recipients of faxes or e-mails will be advised in advance (where practicable) that a message containing personal information is being sent, and receipt should be confirmed.

- It is the intention that the privacy policy applicable to Keycorp should apply to parties contracted by Keycorp for the provision of third party services. In the case of agents, contractors or partners, appropriate confidentiality and security provisions will be included in any outsourcing contracts.

Access to personal information

- Upon request, Keycorp will provide access to a person's personal information subject to the information being made available only to the person concerned. Keycorp will use reasonable efforts to verify and authenticate the individual's identity prior to providing access to that personal information. In the case where an intermediary requests personal information on behalf of someone else, then it is Keycorp's requirement that such a request be made in writing inclusive of the consent of the individual insofar as applicable by law.
- Access to, and release of information applies insofar as permitted by law. Keycorp has the right to refuse access to personal information to the extent that: access would pose a threat to life or health of anyone; a serious and imminent threat to the life or health of any individual in the case of information other than health information; access would have an unreasonable impact on other people's privacy; the request for access is frivolous or vexatious; the information relates to existing or anticipated legal proceedings and would not be accessible through the legal "discovery" process ; giving access would prejudice an organisation's negotiations with an individual; giving access would be unlawful; unlawful activity or misconduct of a serious nature is or may be involved; refusing access is required or authorised by law; giving access would prejudice an investigation of unlawful activity or giving access may reveal commercially sensitive information.

Correction of personal information

- Keycorp believes that an individual has the right to control their personal information and will take steps to correct the information if it can be established that the information is not accurate, complete or up-to-date. The request to amend records must be related to the primary reason for the collection and retention of records and records may not be corrected if that information is inaccessible and not used.
- In all instances, Keycorp will endeavour to amend records where it is fair and reasonable to do so and that the prompt efficient delivery of service will not be compromised.

Other Measures

- Irrespective of legislative requirements, Keycorp is committed to developing a culture of privacy 'best practice' and all employees of Keycorp are required as part of their terms and conditions of employment to do their utmost to protect the confidentiality of personal information.
- All employee records will be treated with great care and will not be disclosed to a third party without the consent from, or knowledge of the employee.

Complaints

- Keycorp is committed to working with individuals to obtain a fair, reasonable and expedient resolution of any complaints or issues about our privacy policies and procedures.
- In all instances, complaints related to privacy should firstly be directed to the Human Resources Manager, Keycorp via telephone on + 61 3 9403 1777, via fax on +61 3 9403 1688, via email on info@keycorp.net or via mail at Post Office Box 8198, Northland Centre, Preston, Victoria 3072.

Acceptance of Privacy Practices

- Keycorp advises that by using the services of Keycorp, an individual signifies acceptance of this Privacy Policy. An individual that does not agree with any of the terms within is requested not to provide any personal information.