

Privacy Policy

inTraffic is committed to maintaining your privacy and we will continue to protect the personal information you provide us and we will manage your personal information as required by the Privacy and Personal Information Protection Act 1998 (NSW), other relevant state legislation, and the Privacy Act 1988 (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**).

safePAY.com.au website is operated by **INTRAFRIC SAFE PAY PTY LTD** ABN 19 651 296 141 trading as Safe Pay who is referred to in this Privacy Policy as “inTraffic”, “we”, “us”, “our” and similar grammatical forms.

By accessing our website, you are accepting the **terms** of this Privacy Policy, and you are consenting to our collection, use, disclosure, retention and protection of your personal information as described in this Privacy Policy.

We will take all reasonable steps to ensure that all information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment.

Collection

inTraffic will only collect information that is necessary for the provision of our services and will not disclose your personal information without your consent unless it is legally permitted or required, or if inTraffic suspects unlawful use of this website.

The type of information we collect from you will depend on what services on our website that you use. The personal information we may collect when you register on our websites, use our Escrow Service, deposit or receive moneys held by us in inTraffic trust deposit account, place an order, respond to a promotional offer, or fill out a form related to any customer service feature operating on our websites includes your name, postal address, email address, telephone numbers and contact details and information for identification purposes. If you make online orders and make payment by credit card or debit card or direct debit from your bank account, we will collect your card or bank account details.

General information about visits to our website is collected by our computer servers, with small files “cookies” that our website transfers to your computer’s hard drive through your Web browser (if you allow the delivery of “cookies”). The “cookies” are used to follow the pattern of movements of users by letting us know which pages on our website are visited, in what order and how often and the previous website visited. The anonymous non-personal information that when collect and analyse in not personal information as described in the Privacy Act.

Why do we use “cookies” and other web use tracking technologies?

When you access our website, a small file containing a unique identification (ID) number may be downloaded by your web browser and stored in the cache of your computer. The purpose of sending these files with a unique ID number is so that our website can recognise your computer when you next visit our website. The “cookies” that are shared with your computer can’t be used to discover any personal information such as your name, address or email address they merely identify your computer to our websites when you visit us.

We can also log the internet protocol address (**IP** address) of visitors to our website so that we can work out the countries in which the computers are located.

We collect information using “cookies” and other tracking technologies for the following reasons:

- (i) to help us monitor the performance of our website so that we can improve the operation of the website and the services we offer;
- (ii) to provide personalised services to each user of our website to make their navigation through our website easier and more rewarding to the user;
- (iii) to sell advertising on the website in order to meet some of the costs of operating the website and improve the content on the website; and
- (iv) when we have permission from the user, to market the services we provide by sending emails that are personalised to what we understand are the interests of the user.

Even if you have given us permission to send you emails, you can, at any time, decide not to receive further emails and will be able to “unsubscribe” from that service.

If you are unhappy about having a cookie sent to you, you can set your browser to refuse cookies or choose to have your computer warn you each time a cookie is being sent. However, if you turn your cookies off, some of our services may not function properly.

Storage

Any personal information we collect will be stored securely and anyone whom inTraffic engages to collect, store or use personal information will be required to comply with the information protection principles of state and federal privacy legislation.

We use different technologies and procedures to help protect personal information from unauthorized access, loss, alternation, disclosure or use. Some of the safeguards we use are physical access controls, information firewalls and access authorisation controls to where your personal information is held in data centres. We also use data encryption when personal information is transferred to and from our service providers. Our commitment to data security means:

- (i) we have procedures to limit access to personal information within our organisation;
- (ii) we use security measures and technologies within our organisation to protect your personal information; and
- (iii) we use service providers that can establish that they have secure controls relating to software security, access security and network security, including where credit card information is being transferred.

Disclosure

We may disclose your personal information to any of inTraffic’s contractors, subcontractors, or service providers. The information will be provided on the basis that the recipient will keep your information confidential.

Types of personal information collected

We collect three categories of information when you use our website:

- (i) the personal information you voluntarily provide — that is, we collect personal information with your informed consent;
- (ii) anonymous non-personal information about how you use our website; and
- (iii) “cookie” based information that makes your use of our website easier by recording your preferences so that when you return to our website the “cookie” re-loads that information into your web browser.

The server for our website collects the following personal information automatically:

- your IP address;
- the system and internet software you are using; and
- any downloaded data and the time of download.

This information will not be used to identify you and may only be used for system administration or other related uses.

The information will not be disclosed.

Other personal information we may collect includes information in any email you send us, as well as your email address. We will use this information to respond to you or for other related purposes. We will communicate with you in relation to any orders you make. We may send you information and updates about any other product, service or information that we provide to our customers; in addition, we may send you

occasional company news and information about other products and services or special promotional offers of our affiliated companies. If at any time you would like to stop receiving future commercial messages from us, we include detailed unsubscribe instructions at the bottom of each email.

We will not disclose this information without your consent except where disclosure is required to comply with the law, enforce our website policies and **terms & conditions**, or protect ours or other rights, property, or safety.

When personal information is provided to us via this website or email, the security and privacy of such information cannot be guaranteed during its transmission unless we have indicated otherwise.

How can I access the personal information that you collect?

We are happy to provide you with details of personal information held about you. APP 12 allows you to get access to, and correct, the personal information we hold about you. To access this information, you need to email or write to us using the contact details below. Please also include your account number if you have registered an account. APP 13 allows you to ask us to take reasonable steps to correction any personal information that is inaccurate, out of date, incomplete, irrelevant or misleading.

If you believe that your personal information has been misused, you can inform us of your complaint by writing to our address and we will attempt to resolve the matter.

INTRAFRIC SAFE PAY PTY LTD ABN 19 651 296 141 trading as Safe Pay at Level 1, Suite 14/13 Digitaria Drive, Gledswood Hills NSW 2557 Telephone 0402 557 190 matthew@safepay.com.au

If you are not satisfied with the outcome of your complaint you may refer the matter to the Office of the Australian Information Commissioner (OAIC). Telephone: 1300 363 992.

enquiries@oaic.gov.au

OAIC complaints page: <http://www.oaic.gov.au/privacy/privacy-complaints>

Other websites

If any information on our website or in our correspondence with you contain links to other websites that do not belong to inTraffic, or if other websites link to our website, we are not responsible for the privacy practices of the entities that operate those other websites and by providing links to the websites we do not endorse or approve those practices.

When you log-into our website using your Google or Facebook log-in (or use any other log-in connected to any other social media platform) you are allowing that social media platform to share your personal information with us (that is, your personal information related to your log-in with that social media platform, which may include your email address and other personal information).

Amendments

inTraffic reserves the right to amend this policy at any time.

Further information

Please feel free to contact us if you require further information or have any concerns.