

xTip Privacy Policy

Effective: 5 February 2024

In this Privacy Policy, 'us' 'we' or 'our' means xTip Pty Ltd (ABN 35 662 187 537) (**xTip**). We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your personal information when you engage with us and the xTip Platform (which includes the xTip mobile application and website).

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details.

1 What personal information do we collect?

We may collect the following types of personal information:

- employee's name
- employee's ID number (if relevant)
- mailing or street address;
- email address;
- telephone number and other contact details;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information;
- information you provide to us through customer surveys; or
- any other personal information that may be required in order to facilitate your dealings with us.

If you do not provide the information we request from you, we may not be able to provide you with access to the xTip Platform.

2 How do we collect your information?

We may collect the above types of personal information directly from you. Here are some of the main ways:

Category	Details
Register on the xTip Platform	When you register as an Account Holder on xTip.
When using the xTip Platform or our related services	For example, we may collect your personal information when you place an order for xTip collateral, such as physical items that display QR codes and NFC enabled products used by the Customer to make service payments.

Recruitment	When you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. The Privacy Act 1988 (Cth) (Privacy Act) contains certain exemptions in relation to certain acts undertaken in relation to employee records and related bodies corporate. Where appropriate, we make use of relevant exemptions in the Act.
Communication	When you communicate with us through correspondence, chats, email, or when you share information with us from other social applications, services or websites.
Interaction	When you interact with our content and advertising, or use our products or services. We may collect personal information about you when you use and access our xTip website and Platform. While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.
Investment	When you invest in our business or enquire as to a potential purchase in xTip.

2.1 For the employee of an Account Holder

If you work for an organisation with a registered account to receive service payments on behalf of its staff using the xTip Platform (**Account Holder**), we may collect your personal information (detailed in section 1) from that Account Holder. The Account Holder must obtain your consent to provide us with your personal information, in accordance with the Account Holder Terms of Use.

2.2 Third Parties

Stripe is the platform which we are conducting and processing our transactions through. Stripe will collect and store your credit card information as required. We will not receive this information. For more information, visit Stripe's website (<https://stripe.com/au>) and refer to its Privacy Policy (available at <https://stripe.com/au/privacy>). You may also be subject to Stripe's End User Terms of Service (available at <https://stripe.com/au/legal/consumer>) as updated from time to time.

Shopify operates the ecommerce section of our website where we sell our xTip products. For more information, visit Shopify's Terms of Service (available at <https://www.shopify.com/au/legal/terms>) and refer to its Privacy Policy (available at <https://www.shopify.com/au/legal/privacy>).

However, there may be circumstances where we may collect your information from third parties, such as a service provider or from a publicly available record.

3 Why do we collect, use and disclose personal information?

We may collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use the xTip Platform;
- to operate, protect, improve and optimise the xTip Platform, our business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;

- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting; as part of a sale or transfer of assets or other corporate transaction;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties; and
- to consider your employment application.

4 Do we use your personal information for direct marketing?

We and/or our carefully selected business partners may send you direct marketing communications and information about xTip. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the *Spam Act 2003* (Cth) and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (eg an unsubscribe link).

5 To whom do we disclose your personal information?

We may disclose personal information for the purposes described in this privacy policy to:

- our employees and related bodies corporate;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
- professional advisers, dealers and agents;
- payment systems operators (eg merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

6 Disclosure of personal information outside Australia

We may disclose personal information outside of Australia, including to third party service providers located in North America, including the United States of America.

We will, however, take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

Please refer to Stripe's Privacy Policy (available at <https://stripe.com/au/privacy>) and Shopify's Privacy Policy (available at <https://www.shopify.com/au/legal/privacy>) to confirm where these third parties may disclose your personal information from time to time.

7 Using our website and cookies

We may use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

8 Security and protection of personal information

We may hold your personal information in either electronic or hard copy form. We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. Despite not being able to guarantee the security of your personal information, below are some of the key things we do to protect your information:

Category	Details
Staff training	We put our staff through training about how to keep your information safe and secure at all times.
Secure storage and handling	We use a combination of techniques and measures to maintain the security of our website and to protect your account and your information.
Destroying or de-identifying your information	We only keep your information for: <ul style="list-style-type: none"> • as long as we need it; • or are lawfully required to keep it; or • otherwise for only 3 months.

9 Links

Our website may contain links to websites operated by third parties, including our payment processor, Stripe. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

10 What are your rights in relation to your information?

You have rights in relation to your personal information. You can contact us to exercise any of your rights in relation to your information.

Here are the things you can ask us to do in relation to your information at any time:

Category	Details
Access	You can access or request a copy of the personal information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.
Correct	If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.
Complain	If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. We take your concerns seriously and will seek to fix any problem as soon as possible. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

11 Contact Us

For further information about our Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact us via email: contact@xtip.com.au

If you're not happy with the way we handle your query or handle your information (including our response to your request to access or correct your personal information), you have a right to lodge a complaint with the Office of the Australian Information Commissioner (**OAIC**) by visiting the OAIC website (<https://www.oaic.gov.au/>).