

Vspry Privacy Policy

About this policy

When you trust Vspry with your personal information, we know that you expect us to protect it and keep it safe. This policy explains how we manage your personal information.

What is personal information?

Personal information includes information that is associated with a specific person and can be used to reasonably identify that person. Personal information does not include information that has been made anonymous, and cannot reasonably identify a specific person. The information that Vspry seeks to collect about you will depend on the products or services that we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services effectively.

Our partners

Vspry's merchants (which may include health and wellness practitioners and retailers) and commercial partners (together, 'our Partners') are independent of Vspry and may have privacy policies which differ from ours. Our Partners are responsible for their own privacy policies and privacy practices. Please contact our Partners directly for further information on their privacy policies.

What are the foundations of this policy?

1. We manage personal information in an open and transparent way.
2. We will provide you the option of not identifying yourself, where it is practical and legal for us to do so.
3. We will only collect personal information from you if the information is reasonably necessary to deliver a product or service to you.
4. If we receive personal information about you which we did not solicit, we will destroy the information if it is legal and practical to do so.
5. We will endeavour to notify you of our Privacy Policy before the time or as soon as practical after we collect personal information from or about you.
6. We will not use or disclose personal information beyond the intended purpose of the collection, unless you have consented for us to do so.
7. We will not use or disclose personal information for the purpose of direct marketing, unless we collected the information from you, and you would reasonably expect us to use or disclose the information for alerting you (by way of example) to a new product or service; and we have provided you with a simple means to opt-out.
8. Before we disclose personal information about you to one of our service providers external to the Vspry Group who is not located in Australia, we will take steps to ensure that the overseas recipient can uphold our Privacy Policy.
9. We will not adopt a government-related identifier of you as a Vspry identifier of you.
10. We will take steps to ensure that the personal information that we collect is accurate, up-to-date and complete.
11. We will take steps to ensure that the personal information that we collect is protected from misuse, interference and loss; and from unauthorised access, modification or disclosure.
12. We will on request by you, give you access to the personal information that we have collected from you.

What kinds of personal information do we collect and hold?

When you apply for our products or services, we may ask for identification information. This could include your name, address, contact details, gender, marital status, date of birth, drivers licence and passport details. We may also collect your tax file number if we are authorised to collect it and if you choose to supply it. In order to add funds to your digital wallet, we will need to obtain your bank account details in order to direct debit your bank account. Throughout the life of your product or service, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries you make. The collection of sensitive information is restricted by law. This includes information about your religion, racial or ethnic origin, political opinions, criminal record, and sexual orientation. It also includes health information and bio-metric information. Generally, we only collect this sort of information if it is necessary to provide you with a specific product or service and you have consented to that collection. For example, we may collect voice and facial bio-metric information to verify your identity or authorise transactions.

You may choose to provide us with access to certain personal information stored by third parties such as social media sites (e.g., Facebook and Instagram). The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your Vspry account and authorising Vspry to have access to this information, you agree that Vspry may collect, store and use this information in accordance with this Privacy Policy.

We may also collect your personal information if you enter a competition or promotion we run (either directly or through our marketing agents or our Partners), or if you apply for employment with us either directly or through a recruitment or employment agency.

We may collect personal information about our Partners' staff directly from those staff or from our Partners. The information we collect about our Partners' staff may include your name, position, contact details and training records.

We may also collect the personal information of our suppliers and service providers' staff during the course of our business activities. This information may include your name, contact details and position. We will collect this information directly from you, or from the applicable supplier or service provider.

For what purposes do we collect, hold, use and disclose personal information?

Vspry only collects, holds and handles information about you that is necessary for us to perform the services you request from us, that is otherwise reasonably necessary for our business activities or if required by law, court, or tribunal order. We may use Personal Information we collect about you for a number of purposes including:

- provide (or assess whether to provide) Vspry products and services;

- customer support;
- process transactions and send notices about your transactions;
- resolve concerns, and troubleshoot problems;
- investigate and prevent potentially prohibited or illegal activities;
- enforce our contracts and agreements with you;
- learn more about your level of satisfaction, your expectations of us and our Partners, and how we can exceed them;
- customise, measure, and improve the content, layout, and operation of our websites;
- deliver targeted marketing, service update notices, and promotional offers based on your communication preferences;
- contact you via telephone, text (SMS) or email messaging, including as authorised by our agreements and contracts with you;
- compare information for accuracy and verify it with third parties;
- confirm your identity for the purposes of anti-money laundering and counter-terrorism laws and assess applications and your suitability for Vspry products and services;
- to consider you for a position at Vspry for which you have applied;
- to acquire goods or services from you or from your employer;
- for the purpose of performing data analytics including to improve our and our Partners' services;
- for other purposes to which you have consented; and
- as required or permitted by relevant laws and regulations.

You agree that we may use your Personal Information for the purposes for which we collect it and for related purposes which would be reasonably expected by you. If all or some of your personal information is not collected or cannot be verified, we may be unable to provide you with Vspry products and services or a customised experience, engage with you, or do business with you.

How do we collect personal information?

We collect most personal information directly from you. For example, we will collect your personal information when you apply for or use a product or service or talk to us in person or on the phone. We also collect information from you electronically, for example, when you visit our website or whenever you apply for or access Vspry products and services electronically (see "Do we collect personal information electronically?"). Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- other Vspry Group businesses which include www.ineedadentist.com and www.dentalservicesnetwork.com.au;
- healthcare providers;
- publicly available sources of information, such as public registers;
- your representatives (including your legal adviser, financial adviser, executor, administrator, guardian, trustee, or attorney);
- your employer;
- other organisations, who jointly with us, provide products or services to you; and
- commercial information service providers, such as companies that provide fraud prevention reports and identity verification.

What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- certain identification information about you by Anti-Money Laundering and Counter-Terrorism Financing laws, regulations and rules;
- your taxation identifier, if you choose to provide it; and
- if you have applied for credit, information about your financial position.

How do we hold personal information?

Much of the information we hold about you will be stored electronically in secure data centres which are in Australia and owned by either the Vspry Group or external service providers. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- access to information systems is controlled through identity and access management;
- employees are bound by internal information security policies and are required to keep information secure;
- all employees are required to complete training about information security; and
- we regularly monitor and review our compliance with internal policies and industry best practice.

We also take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

Who do we disclose your personal information to, and why?

We may share your personal information with other companies within the Vspry Group. We may also provide personal information about our customers to organisations outside the Vspry Group. To protect personal information, we enter into contracts with our service providers that require them to comply with our Privacy Policy and privacy regulations. These contracts oblige them to only use the personal information we disclose to them for the specific role we ask them to perform. In essence, we disclose personal information to organisations that help us with our business, including:

- our agents, contractors and external service providers (for example, mailing houses and technology service providers);
- healthcare providers;
- other Vspry Group businesses which include www.ineedadentist.com and www.dentalservicesnetwork.com.au;
- payment systems participants (for example, merchants receiving payments);
- other organisations, who jointly with us, provide products or services to you;
- debt collectors;
- our financial advisers, legal advisers or auditors;
- your representatives (including your health practitioner, legal adviser, accountant, financial adviser, executor, administrator, guardian,

- trustee, or attorney);
- identity verification service providers;
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- external dispute resolution schemes; and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside the Vspry Group where:

- we are required or authorised by law or where we have a public duty to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under privacy regulations.

Do we disclose personal information overseas?

We may disclose your personal information to a recipient which is located outside Australia. This includes for international transactions, such as currency exchanges, we may need to disclose your information to the corresponding international party in order to process the transaction. The countries we disclose your information to will depend on the details of the transaction you ask us to carry out.

Do we use or disclose personal information for marketing?

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. These products and services may be offered by a member of the Vspry Group such as www.ineedadentist.com and www.dentalservicesnetwork.com.au, or one of our preferred suppliers. We may offer you products and services by various means, including by mail, telephone, email, SMS or other electronic channels, such as through social media or targeted advertising through Vspry Group or non-Vspry Group websites. We may also disclose your personal information to companies outside the Vspry Group who assist us to market products and services to you. If you don't want to receive marketing offers from us, please contact us.

Do we collect personal information electronically?

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications. Each time you visit our website, we collect information about your use of the website, which may include the following:

- The date and time of visits;
- Which pages are viewed;
- How users navigate through the site and interact with pages;
- Location information about users;
- Information about the device used to visit our website; and
- IP addresses.

We use technology called cookies when you visit our site. Cookies are small pieces of information stored on your hard drive or in memory. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience. One of the reasons for using cookies is to offer you increased security. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent to another site or be retrieved by any non-Vspry Group site. We won't ask you to supply personal information publicly over Facebook, Instagram, YouTube or any other social media platform that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question about your account. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

Access to and correction of personal information.

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us. There is no fee for requesting that your personal information is corrected or for us to make corrections. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you. There are some circumstances in which we are not required to give you access to your personal information. If we refuse to give you access to or to correct your personal information, we will give you a notice explaining our reasons except where it would be unreasonable to do so. If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy. If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

Resolving your privacy concerns - your rights.

If you are concerned about how your personal information is being handled or if you have a concern about a breach by us of privacy regulations, please contact us by calling **1800 934 185** and ask to speak with our Compliance Officer, or by writing to our Compliance Officer at Level 36, 71 Eagle St Brisbane QLD 4000, or by sending an email to compliance@vspry.com. We will acknowledge your concern as soon as we can after receipt of your concern. We will let you know if we need any further information from you to resolve your concern. We aim to resolve concerns as quickly as possible. We strive to resolve concerns within seven days, but some concerns may take longer to resolve. If your concerns is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response. If you are unhappy with our response, you can request that your concern is referred to our Chief Executive Officer.

Vspry is a member of the Australian Financial Complaints Authority (AFCA) which is the sole external dispute resolution (EDR) scheme for financial disputes in Australia. Its purpose is to provide free, fair, independent and effective solutions for financial disputes, facilitated by professional and experienced staff, whom follow a clear complaint resolution process, working with both you and Vspry. If you are unhappy with Vspry's response to your concerns, you can lodge a complaint with AFCA by contacting them on **1800 931 678** (free call) or visiting their website at www.afca.org.au, or by mail addressed to Australian Financial Complaints Authority Limited, GPO Box 3 Melbourne, VIC 3001.

You can also approach the Office of the Australian Information Commissioner about the way we handle your personal information. The Commissioner can be contacted at: GPO Box 5218 Sydney NSW 2001, via telephone on 1300 363 992, via email at [or](#) via their website .