



MONFINA PAYMENTS PTY LTD · MONFINA PTY LTD

Privacy Policy

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How Monfina Payments Pty Ltd and Monfina Pty Ltd collect, hold, use and disclose your personal information under the *Privacy Act 1988* (Cth).

1. About this Privacy Policy

This Privacy Policy explains how Monfina Payments Pty Ltd (ABN 51 674 639 313, ACN 674 639 313) (**Monfina Payments**) and Monfina Pty Ltd (ABN 49 618 270 572, ACN 618 270 572) (**Monfina**) collect, hold, use and disclose personal information in connection with their respective business activities and services, and how they meet their obligations under the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (**APPs**).

Monfina Payments is the customer-facing entity through which customers ordinarily interact in relation to enquiries, onboarding, account administration, remittance, payment and related services.

Monfina is the holder of Australian Financial Services Licence No. 512986. Monfina Payments is a Corporate Authorised Representative of Monfina (Corporate Authorised Representative No. 001323499) for specified financial services within the scope of its written authorisation.

Monfina Payments is separately registered with AUSTRAC to provide remittance services. Its AUSTRAC registration and its appointment as a Corporate Authorised Representative of Monfina are separate regulatory arrangements.

In this Privacy Policy, **Monfina Group** means Monfina Payments and Monfina collectively. References to **we**, **us** or **our** mean the relevant Monfina Group entity that collects, holds, uses or discloses your personal information in the circumstances.

Where an information-handling activity relates specifically to one entity, that entity will be identified.

FORMER COMPANY NAME

Monfina Payments Pty Ltd was formerly known as AU Bridge Pty Ltd. This was a change of company name and did not result in the establishment of a new legal entity. References in historical records, agreements or other documentation to AU Bridge Pty Ltd may therefore relate to the same legal entity now known as Monfina Payments Pty Ltd.

KEY TERMS

TERM	MEANING
Personal information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not it is true and whether or not it is recorded in a material form.
Sensitive information	A category of personal information that includes, for example, information about your racial or ethnic origin, political opinions or associations, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or practices and criminal record, as well as health, genetic and biometric information.

We may update this Privacy Policy from time to time by posting a revised version on our website. Our website may contain links to third-party sites; this Privacy Policy does not apply to those sites.

2. Information we collect

The personal information we collect generally includes your name, address, date of birth, occupation, contact details (including telephone and email), identification document details, account and financial details, transaction information, location information and IP address information. Where you are associated with a business customer, we may also collect information about your role, authority and beneficial ownership.

When you open an account or are added as an Authorised Person or signatory, the law requires us to identify you. AML/CTF laws require us to sight and record details of certain identification documents, and we may verify the information you provide against independent sources.

The information we request is generally needed to enter into or perform our agreement with you, or to meet our obligations under laws such as the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth). You do not have to provide it, but if you do not, or if the information is incomplete or inaccurate, we may be unable to provide the services requested.

We will collect sensitive information about you only with your consent, or where the collection is required or authorised by law.

3. How we collect information

We generally collect personal information directly from you, for example when you make an enquiry, complete onboarding, use our services or platform, or communicate with us by telephone, email or other channels.

When you submit an enquiry through our website, we collect the details you enter (such as your name, email address, phone number, company and message) so we can respond to you. Our forms use a security check to protect against spam and automated misuse, which may process technical information about your device and browser. We also use website analytics and tag-management tools, including Google Tag Manager, Google Analytics and Microsoft Clarity, to understand how visitors use our website and to measure whether enquiries are completed. These tools may use cookies and similar technologies to collect information such as your IP address, approximate location, device and browser type, pages viewed, how you reached our website and how you interact with its pages. When you submit an enquiry, we may record that an enquiry was made (including its topic and reference) in our analytics tools, but we do not send the personal details you enter in the form to them. For more information, including how to control cookies, see our Cookie Policy at www.monfina.com.au.

We may also collect personal information from other sources where it is unreasonable or impracticable to collect it from you, including from a business customer you are associated with, identity-verification and screening providers, banks and payment providers, public registers (such as ASIC registers and ABN Lookup) and other publicly available sources.

If we receive personal information we did not solicit, we will keep it only if it is reasonably necessary for our functions or activities; otherwise we will destroy or de-identify it where lawful and reasonable to do so.

4. Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information for purposes including:

- responding to customer enquiries, onboarding and account administration;
- identity and beneficial ownership verification;
- customer due diligence;
- AML/CTF, sanctions, politically exposed person (PEP) and adverse-media screening;
- fraud prevention and transaction monitoring;
- providing payment, remittance and foreign exchange-related services;
- processing customer instructions and transactions;
- dealing with banks, payment providers and other service providers involved in providing a service;
- handling complaints and disputes;

- regulatory reporting, audit and record keeping;
- managing cybersecurity, operational and regulatory risk;
- monitoring, evaluating and improving our services and website, including through website analytics; and
- sending you information about our services where permitted by law (see section 11).

We will not use or disclose personal information for a purpose other than the purpose for which it was collected unless you have consented, you would reasonably expect us to and the purpose is related (or, for sensitive information, directly related), or the use or disclosure is otherwise required or permitted by law.

5. Sharing information within the Monfina Group

Monfina Payments and Monfina may disclose personal information to each other where reasonably necessary for their respective business activities and regulatory obligations.

This may include disclosure for the purposes of providing or administering a Service, supervising financial services provided by Monfina Payments as a Corporate Authorised Representative of Monfina, compliance monitoring, risk management, customer due diligence, complaints handling, audit, record keeping, regulatory reporting and responding to lawful requests from regulators or government authorities.

Where Monfina Payments provides a financial service on behalf of Monfina under Monfina's AFSL, relevant customer information may be made available to Monfina to enable Monfina to discharge its obligations as the AFS licensee.

6. Disclosure to third parties

Depending on the service being provided, we may disclose personal information to:

- banks and other financial institutions;
- payment service providers;
- foreign exchange providers;
- financial product issuers;
- identity-verification providers;
- AML/CTF and sanctions-screening providers;
- technology, software and cloud service providers;
- professional advisers, including lawyers and accountants;

- auditors;
- insurers;
- regulators, government agencies and law enforcement bodies, where required or authorised by law; and
- any person acting on your behalf, such as your accountant, lawyer or attorney.

The particular third parties involved will depend on the service being provided. Where third parties handle personal information on our behalf, we take reasonable steps to require them to protect it and use it only for the purposes for which it was provided.

We may be required by law to disclose personal information, for example under court orders, statutory notices, or laws relating to taxation, sanctions or anti-money laundering and counter-terrorism financing.

7. Overseas disclosure

Personal information may be disclosed to, accessed from, stored or processed in overseas jurisdictions by relevant technology, cloud, identity-verification, compliance, banking, payment or foreign exchange providers. The jurisdictions involved depend on the providers used for a particular service.

In particular, our website analytics and tag-management providers (including Google and Microsoft) and our website security provider (Cloudflare) may store or process information collected through our website in the United States and other countries where they or their service providers operate.

Where personal information is disclosed overseas, we take reasonable steps to ensure that it is protected in a manner consistent with the APPs, including through contractual arrangements with those providers. For more information, please contact our Privacy Officer.

8. Automated processing and decision-making

We use technology and automated systems to help with identity verification, customer due diligence, sanctions and PEP screening, fraud prevention, transaction monitoring and risk assessment. These systems may flag information, applications or transactions for further review.

If you have a question about how automated processing has been used in relation to you, please contact our Privacy Officer.

9. Security of personal information

We take reasonable steps to protect the personal information we hold from misuse, interference and loss, and from unauthorised access, modification and disclosure. We use administrative, technical and physical safeguards, which include:

MEASURE	WHAT WE DO
Staff training	Training staff on their obligations in relation to personal information
Access control	Limiting access to personal information and requiring staff to authenticate before accessing our systems
Encryption	Encrypting data transmitted between your device and our systems
System protection	Using firewalls, monitoring and anti-malware tools to protect our systems
Third-party providers	Assessing and managing the information-security risks associated with third-party service providers, including through contractual requirements
Physical records	Providing secure storage for physical records

We take reasonable steps to keep the personal information we hold accurate, up to date, complete and relevant. Please tell us if your details change.

If we become aware of a data breach that is likely to result in serious harm, we will notify you and the Office of the Australian Information Commissioner as required under the Notifiable Data Breaches scheme in the *Privacy Act 1988* (Cth).

10. Retention of personal information

We retain personal information for as long as reasonably necessary for the purposes for which it was collected and to satisfy applicable legal, regulatory, contractual, dispute-management and record-keeping requirements.

Different retention periods may apply to different categories of information depending on the nature of the information and the applicable legal or regulatory requirements.

Where personal information is no longer required to be retained, we will take reasonable steps to securely destroy or de-identify it, subject to applicable law.

11. Direct marketing

We may use your personal information to tell you about our services where permitted under the *Privacy Act 1988* (Cth) and the APPs. You can opt out at any time by emailing support@monfina.com.au with the subject "Unsubscribe", or by using the unsubscribe facility in an electronic message. Opting out does not affect messages we must send to provide our services or meet legal obligations.

We will not adopt a government-related identifier (such as a tax file number) as our own identifier for you, unless required or authorised by law.

12. Access and correction

You can ask for access to the personal information we hold about you, or ask us to correct information you believe is inaccurate, out of date, incomplete, irrelevant or misleading, by contacting our Privacy Officer (see section 14).

We will confirm your identity before acting on a request. We will not charge you for making a request, and we will respond within a reasonable period, generally within 30 days.

If we refuse to give access or make a correction, we will tell you in writing why, unless it would be unreasonable to do so, and how you can complain. If we refuse a correction, you can ask us to attach a statement to the information noting that you consider it inaccurate, out of date, incomplete, irrelevant or misleading.

If we correct information we have previously disclosed to another APP entity, you can ask us to notify that entity, and we will do so unless it is impracticable or unlawful.

13. Privacy complaints

If you have a concern or complaint about the way Monfina Payments or Monfina has handled your personal information, please contact our Privacy Officer using the contact details set out in this Privacy Policy.

We will acknowledge and investigate your privacy complaint and seek to respond within a reasonable period.

If you are not satisfied with our response, you may be entitled to lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

OFFICE OF THE AUSTRALIAN
INFORMATION COMMISSIONER

Web	www.oaic.gov.au
Phone	1300 363 992
Mail	GPO Box 5218, Sydney NSW 2001

Complaints concerning a financial service, rather than the handling of personal information, should be made through the complaints and dispute resolution process described in the applicable Financial Services Guide and Terms of Business.

14. Contact our Privacy Officer

The Monfina Payments Privacy Officer is the primary contact for all privacy enquiries, requests and complaints.

CONTACT	DETAILS
Email	compliance@monfina.com.au , marked "Attention: Privacy Officer"
Phone	1300 907 502
Post	Privacy Officer, Monfina Payments Pty Ltd, Level 8, 99 Walker Street, North Sydney NSW 2060, Australia

Where your request relates specifically to personal information handled by Monfina Pty Ltd in connection with its obligations as the AFS licensee, the Privacy Officer will coordinate the request with Monfina as appropriate.