EZYPAY

Ezypay Privacy Policy 2026



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Revision Table

Release

Version	Date Released	Change Notice	Pages Affected
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2.0	12 Aug 24	Annual Review	No Changes
3.0	16 Sept 25	Annual Review	No Changes
4.0	9 Oct 26	Annual Review	All Pages

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Privacy Policy

Ezypay acknowledges and respects the importance of protecting the privacy and personal information of the individuals we interact with. We are committed to handling personal information responsibly and in accordance with applicable privacy and data protection laws in the countries and territories in which we operate.

This Privacy Policy explains how Ezypay collects, uses, stores, protects and discloses personal information in connection with our payment services, websites, platforms, merchant and partner relationships, customer support and business operations. It also explains the rights and choices individuals may have in relation to their personal information.

This Privacy Policy should be read together with any applicable Ezypay terms and conditions, agreements, payment authorities and privacy or collection notices.

1. Who are we and when this policy applies

Ezypay provides subscription billing, recurring payment and related payment services across the Asia-Pacific region.

The Ezypay entity responsible for handling your personal information is the entity identified in your agreement, application, payment authority, collection notice or other communication with us.

In this Privacy Policy, “Ezypay”, “we”, “us” and “our” refer to the relevant Ezypay entity and, where applicable, other Ezypay entities that support our services and business operations.

This Privacy Policy applies to personal information we handle in connection with our websites, platforms, hosted payment pages, payment services, merchant and partner relationships, customer support and broader business operations.

Where a merchant, partner or other third party collects or handles your personal information for its own purposes, it may have separate privacy obligations and its own privacy policy or notice. This Privacy Policy does not apply to independent third-party websites or services linked from our websites or services.

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2. Whose personal information we handle

We may handle personal information about:

- customers and payers of Ezypay merchants;
- merchants, sole traders, directors, officers, beneficial owners, authorised signatories and account representatives;
- prospective merchants, partners and business contacts;
- users of our websites, portals, applications, hosted payment pages and support services; and
- other individuals whose personal information we receive in connection with our services and business operations, including from merchants, partners, banks, payment networks, card schemes, service providers, regulators or authorised representatives.

3. Personal information we collect

The information we collect depends on the service, your relationship with us and applicable legal requirements. It may include:

- **identity and contact information**, such as your name, contact details and information used to verify your identity;
- **merchant and business information**, including information about a business, its representatives, ownership and control;
- **verification and compliance information**, including information reasonably required to conduct identity, Know Your Customer (KYC), Know Your Business (KYB), anti-money laundering, sanctions and other regulatory checks;
- **payment and transaction information**, including payment method, bank account, transaction, refund, chargeback and dispute information;
- **fraud, credit and risk information**, where relevant and permitted by law;
- **technical and usage information**, including information about devices, browsers, access to our systems and use of our websites and services;
- **communications and support information**, including enquiries, complaints and other correspondence; and
- **preferences and other information** you provide to us in connection with our services.

Sensitive information

We do not generally seek to collect sensitive information unless it is reasonably necessary for our functions or activities or required or permitted by applicable law. Where we collect sensitive information, we will do so with your consent where required, or where another lawful basis or exception applies.

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We collect personal information that is reasonably necessary for the relevant purpose and in accordance with applicable law. If required information is not provided, we may be unable to onboard or support a merchant, process or authenticate a payment, provide a requested service or meet our legal and regulatory obligations.

4. How we use personal information

We may use personal information to:

- provide, administer and support subscription billing, recurring payments, payment processing and related services;
- establish, manage and support merchant, partner and customer relationships;
- verify identity, business details, authority, ownership and eligibility;
- process, authenticate, settle and reconcile transactions and provide related payment services;
- prevent, detect, investigate and manage fraud, unauthorised activity, money laundering, terrorism financing, sanctions exposure and other financial crime risks;
- conduct merchant underwriting, credit and risk assessments and ongoing transaction monitoring;
- manage declined payments, refunds, reversals, chargebacks, disputes, debt recovery, complaints and legal claims;
- comply with applicable legal, regulatory and licensing requirements, as well as obligations to banks, acquirers, card schemes and payment networks;
- protect the security, availability and integrity of our services, systems and information;
- improve our services, perform analytics, test controls and support business continuity;
- send operational, security, legal and service-related communications;
- send marketing communications where permitted by applicable law and manage communication preferences; and
- exercise or defend legal rights, support audits and professional advice, and manage proposed or completed corporate transactions.

We use personal information only where permitted under applicable laws and regulations. The basis on which we use personal information will depend on the relevant jurisdiction, the nature of our relationship with you and the purpose for which the information is being used. Where required, we will obtain consent for the use of personal information, and you may withdraw that consent subject to applicable law and any consequences explained to you at the time.

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5. Who we disclose personal information to

We may disclose personal information, where reasonably necessary and lawfully permitted, to:

- the merchant, partner or authorised representative connected with the account or payment;
- other Ezypay and affiliated entities that support our services and business operations;
- banks, acquirers, payment processors, gateways, card schemes, payment networks and their service providers;
- identity verification, KYC/KYB, sanctions screening, credit, fraud prevention, debt collection and transaction-monitoring providers;
- cloud hosting, data storage, communications, customer support, analytics, security and other technology or operational service providers;
- auditors, insurers, legal and professional advisers and parties involved in proposed or completed corporate transactions, subject to applicable confidentiality and other protections;
- regulators, financial intelligence units, courts, law enforcement agencies and government bodies where disclosure is required or permitted by law; and
- other parties where you direct or authorise us to disclose your personal information.

We do not sell personal information. We take reasonable steps to ensure service providers that handle personal information on our behalf are subject to appropriate privacy, confidentiality and security requirements.

Information may also be disclosed to recipients located outside the country in which it was collected. Further information about how we handle personal information internationally is set out in **Section 6 – International handling of personal information**.

6. International handling of personal information

Ezypay operates across the Asia-Pacific region and may disclose or make personal information available to Ezypay entities and service providers located outside the country in which the information was collected.

Where personal information is handled across borders, we take reasonable steps to ensure appropriate privacy, confidentiality and security safeguards are in place in accordance with applicable law.
Where required by applicable law, we will provide information about the countries in which overseas recipients are located.

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7. Data quality, retention and disposal

We take reasonable steps to ensure personal information is accurate, complete and up to date for the purposes for which it is collected, used or disclosed. Please let us know if your personal information changes or needs to be corrected.

We retain personal information for as long as reasonably necessary to provide our services, meet our legal and regulatory obligations, manage disputes and risks, and support our business operations. Retention periods may vary depending on the type of information, the purpose for which it is held and the applicable requirements in each jurisdiction.

When personal information is no longer required, we take reasonable steps to securely delete, destroy or de-identify it, unless we are required or permitted by applicable law to retain it.

8. How we protect personal information

We take reasonable steps to protect personal information from loss, misuse, interference, unauthorised access, modification or disclosure.

We maintain appropriate technical, organisational and physical safeguards designed to protect the personal information we handle. Where applicable, payment account data is handled in accordance with relevant PCI DSS requirements.

No method of transmitting or storing information is completely secure. You should protect your account credentials and notify us promptly if you suspect any unauthorised activity.

9. Cookies and similar technologies

Our websites and digital services may use cookies and similar technologies to operate our services, remember preferences, understand how our websites and services are used, maintain security, measure performance and, where permitted, support marketing activities. Some of these technologies may be provided by third parties.

You can manage certain cookies and similar technologies through your browser settings or any preference tools we make available. Disabling some technologies may affect the functionality of our websites or services.

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10. Direct marketing

Where permitted by applicable law, we may use your contact details to provide information about relevant Ezypay products, services, events or offers. You can opt out of receiving marketing communications at any time using the unsubscribe or opt-out method provided in the communication, or by contacting us to update your preferences. If you opt out of marketing communications, we may still send you operational, security, legal or service-related communications where necessary.

11. Automated decision-making

Ezypay may use rules, models and automated tools to support transaction authentication, fraud prevention, sanctions and risk screening, merchant monitoring, service security and other operational activities. These tools may use personal information to identify potential risks, support reviews and assist with decisions relating to our services.

Where applicable law provides a right in relation to an automated decision that significantly affects an individual, you may contact us to request relevant information, express your views or seek human review, subject to lawful limitations.

12. Your privacy rights

Depending on the applicable law, you may have the right to:

- request access to personal information we hold about you;
- request correction of inaccurate, incomplete or outdated information;
- request deletion or de-identification of your personal information in certain circumstances;
- withdraw consent or object to certain uses of your personal information;
- request restrictions or portability of your personal information where applicable;
- opt out of direct marketing;
- exercise any applicable rights in relation to automated decision-making; and
- make a privacy complaint to us or the relevant privacy or data protection authority.

We may need to verify your identity or authority before responding to a request. We will respond to privacy requests in accordance with applicable law and explain where a request cannot be fulfilled.

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13. Privacy incidents

We maintain processes to assess and respond to suspected privacy and security incidents. Where required by law, we will notify affected individuals and relevant authorities. A notification may describe the incident, information involved, likely consequences, protective steps and how to obtain assistance.

14. Contacting us and making a complaint

If you have a question about this Privacy Policy, wish to exercise your privacy rights or make a privacy complaint, you can contact us using the details below. We may ask you to provide information to help us understand your request and verify your identity or authority where necessary. We will review and respond to privacy requests and complaints in accordance with applicable law.

Contact	Privacy Officer / Business Compliance
Email	compliance@ezypay.com
Customer support	help@ezypay.com
Postal address	Stone & Chalk, Level 1, 477 Pitt Street, Sydney NSW 2000, Australia

If you are not satisfied with our response, you may contact the privacy or data protection authority in your jurisdiction. Nothing in this policy limits any right available under applicable law.

15. Changes to this policy

We may update this policy to reflect changes in law, services, technology, group structure or information-handling practices. The current version will be published on the relevant Ezypay website with its effective or last-updated date. Where required, we will provide additional notice of material changes.

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