

CASHLOG PRIVACY POLICY

Cashlog is a mobile payment solution that enables merchants to sell digital goods and services and for customers to select those digital goods and services (the “**Products**”) via mobile, fixed telephone and internet and make payment via their Carrier billing (the “**Cashlog Service**”). Cashlog is managed by Buongiorno Australia Holdings (Pty) Limited, registered in Australia under company number CAN 159575621 but trading as **Cashlog**.

In this Privacy Policy references to “we”, “us”, “our” and any similar expression shall include the Company and any of its affiliates. This Privacy Policy is to be entered into between the Company and the customer (i.e. you).

Terms defined in the Cashlog Terms of Use shall apply equally to this Privacy Policy.

1. INTRODUCTION

- 1.1 We understand and recognise the importance of safeguarding the Personal Information (hereinafter defined) of our customers and so we have formulated this Privacy Policy to reflect our commitment to maintaining the confidentiality of the information received from you via the Cashlog Service.
- 1.2 This Privacy Policy will inform you of what Personal Information we may collect from you, how we use, process and retain it, the choices you have regarding our use of it, your ability to review and correct it and how to opt out of the Service or from receiving any promotional material.
- 1.3 This Privacy Policy is supplemental to the terms and conditions for the Cashlog Service found at **URL: <https://www.cashlog.com/legal/customer-term-of-use>** which forms an integral part of this Privacy Policy.
- 1.5 The Merchants that you communicate with and/or purchase Products from and your Carrier processing any payment regarding the Products each act in its capacity as an independent data controller and in compliance with applicable data protection laws so will have their own terms and conditions and privacy policy which will set out how they respectively provide their services and process your personal information.

2. PERSONAL INFORMATION

- 2.1 This could include any information about you or by which you can be identified e.g. your name, address, mobile numbers, photographs, birth date, gender, occupation, personal interests, etc (“**Personal Information**”).
- 2.2 Generally, you can access the Cashlog Services without telling us who you are or revealing any Personal Information although we may collect certain information about your visit to help us to improve the service quality.
- 2.3 When you access the Cashlog Services, register and/or order a Product or raise a customer query (or as required), you may have to complete a registration process including completing any forms and providing some Personal Information.
- 2.4 We gather the Personal Information to allow us to help process your registration, process any requests or payments you may make, administer your contract, help in processing refunds, communicate with you, award prizes and provide marketing or promotional materials.

- 2.5 We also collect the Personal Information in order to grant you access to the online Cashlog Services, monitor your usage of the Cashlog Services, and/or participation in online activities including reviews, testimonials or competitions, if any. The information is also collected for such other uses as are expressly set out in this Privacy Policy below.
- 2.6 You can refuse the collection by us of some of the Personal Information or any other information. However, if you decline to provide all information required this could limit your access to some of the Cashlog Services.
- 2.7 Where you have granted this consent, then for each visit to the Cashlog Services, our systems automatically recognize the mobile number and mobile device type used to communicate with us (where possible). For analytical purposes in order to monitor trends and statistical data, we may also track the following:
- URL/internet protocol address
 - Mobile device location
 - Browser type
 - Pages of the Cashlog Services accessed
 - Viewed search terms
 - Your online service behaviour e.g. Product/service purchases
 - Widget/app downloads, social media sharing, comments reviews etc
 - Individual users will remain anonymous, unless you tell us who you are

3. CHILDREN AND MINORS

- 3.1 We do not knowingly collect or solicit Personal Information from children and minors. Anyone under the age of 18 will not be knowingly allowed to register for the Cashlog Services. If you are under 18, please do not attempt to register for the Cashlog Services or send any Personal Information to us.
- 3.2 In the event that we become aware or informed that we have collected Personal Information from anyone under the age of 18 without verification of parental consent, we will immediately terminate the user's account but the Personal Information may be kept for such a period as set out below in Clause 8 (Retention of Personal Information). Minors under the age of 18 years old should make sure that they ask their parents for permission before sending any information.

4. INFORMATION TO THIRD PARTIES

- 4.1 We will not rent, sell or share your Personal Information with other organisations or non-affiliated companies for commercial purposes unless you have expressly consented to this. However, by law or for regulatory reasons we may be required to disclose any Personal Information to certain third parties if required to investigate or deal with any complaints relating to you or your use of the Service.
- 4.2 Your Personal Information may be disclosed to other businesses within our group of companies and to reputable third parties who will help process your purchase to the Service if necessary, such as our supply and customer service agents and data processors.
- 4.3 If all or part of our business is sold, (whether by sale of shares or assets) or integrated with another business, your details and Personal Information may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business for the sole purpose of business asset transaction. Following completion of

any such sale or transfer of the business, your Personal Information shall be one of the transferred assets and so be disclosed to and transferred to such new owner or third party. "Business asset transaction" means the purchase, sale, lease, merger or amalgamation or any other acquisition, disposal or financing of an organisation or a portion of an organisation or of any of the business or assets of an organisation.

- 4.4 We do ask our third parties to confirm that their privacy practices are consistent with or no less stringent than ours however we cannot be held liable for any privacy policy that does not meet the same standards as ours.

5 YOUR CONSENT

- 5.1 You agree to us collecting, using, processing and retaining your Personal Information as set out in this Privacy Policy.

- 5.2 You acknowledge and agree that when we disclose any Personal Information we have collected to a recipient located outside the country where you are located in then: (a) that Personal Information may go to a country that has different privacy laws than your country (and which may not be comparable), and (b) it will be handled in accordance with the laws of that country, and not necessarily with your country's privacy law, and (c) that we may not take steps to ensure that the foreign recipient handles your Personal Information in accordance with the privacy laws of your country. You consent to us disclosing your Personal Information to recipients located outside your country on that basis.

- 5.3 The countries within our group of companies that your Personal Information could be passed to are the UK, Italy, Spain and South Africa including that of any merchant which would then be subject to their privacy policy and local laws.

- 5.4 By submitting your Personal Information you consent to these third party transfers.

- 5.5 Cashlog reserves the right to record all telephone calls made to Cashlog and to monitor all information relating to the Cashlog Service for information, training and monitoring purposes for which purposes you consent to on each occasion.

6 COOKIES

- 6.1 The Cashlog Services uses 'cookies' to distinguish you from other users of the Cashlog Services. A 'cookie' is a small amount of data or parcels of text that is sent to your browser from a web server and stored on your mobile device's hard drive if consented to that. Generally, such a 'cookie' being a file in your web browser will enable the website to recognise your mobile device when you visit the website.

- 6.2 Cookies help us to enhance your experience when you access the Cashlog Services and also allow us to improve it. We may obtain information about your general internet usage by using such cookie files which are stored on the browser of your mobile device type. Cookies contain information that is transferred to your mobile device type.

- 6.3 **Cookies enable us to:**

- estimate our audience size and usage pattern;
- evaluate the Service;
- store information about your preferences, and so allow us to customise our site according to your individual interests;
- speed up your searches;

- speed up your purchasing process;
- recognise you when you return to our site;
- provide a more convenient browsing experience for you.

6.4 If you accept and allow your telephone number to be tracked by clicking the “remember me” or the “confirm” button either on the Cashlog portal, in the confirmation step of the Customer registration processor or on the Cashlog Purchase flow, in the first and/or the confirmation step, then you will be deemed to have accepted the use of such cookies and other software and this will make the purchase process quicker and easier, thanks to the automatic identification of the Client, which will afford direct access to Cashlog functionalities and the purchase process.

6.5 When the mode of connection does not allow the Client to be automatically identified, a pin code of the purchase confirmation will be sent to the telephone number of the Client.

6.6 You may refuse to accept all cookies, reject all cookies, or modify your browser to alert you of any new cookies by activating these settings on your browser. However, if you select any of these settings you may be unable to access certain parts of the Cashlog Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access the Cashlog Services. Please note that our affiliates may also use cookies, over which we have no control.

6.7 If you wish to reject cookies or alter the access in any way you can follow the instructions on your device. Please always check for updated network operator or device software instruction versions as to how to control cookies.

7. UPDATING YOUR INFORMATION

If you wish to update or correct your Personal Information, please let us know by:

Email: support_au@cashlog.com

8. RETENTION OF PERSONAL INFORMATION

We shall cease to retain your Personal Information, or remove the means by which the Personal Information can be associated with particular individuals, as soon as it is reasonable to assume that retention is no longer necessary for legal or business purposes.

9. WITHDRAWAL OF CONSENT

You may at any time withdraw your consent to us collecting and processing your personal data in accordance with this Privacy Policy by giving written notice to support_au@cashlog.com. Upon receipt of the withdrawal notice, we will aim to terminate your registration with us with immediate effect and we shall aim to cease (and cause our data intermediaries and agents to cease) collecting, using or disclosing the personal data, as the case may be, as soon as feasibly possible unless such collection, use or disclosure, as the case may be, without your consent, is required or authorised for legal or regulatory purposes.

10. SECURITY STATEMENT

- 10.1 The security internal procedures are designed to cover the storage, access, disclosure and retention of your Personal Information.
- 10.2 We are committed to online security. We maintain security measures to protect the sensitive data via the Cashlog Service and to prevent unauthorised access of Personal Information that is transmitted to our databases. We cannot however guarantee the security of any data sent over the Internet.
- 10.3 This Security Statement explains how we store and safeguard the information we collect about you, and procedures that we have in place to safeguard your privacy generally.
- 10.4 We always use industry-standard encryption technologies when transferring and receiving Personal Information exchanged with the Cashlog Services. We have appropriate security measures in place in our physical facilities to protect against the loss, misuse or alteration of Personal Information that we have collected from you on the Cashlog Services.
- 10.5 Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure.
- 10.6 To prevent unauthorised access, maintain accuracy of our records and data to ensure proper use of Personal Information, we have put in place appropriate physical, electronic and managerial procedures to protect, secure and safeguard the personal data and information we collect, on or through our website. The following provisions and arrangements are in place:
 - a) we have a management and corporate commitment to information security within the organisation and provide clear direction, guidance and responsibilities and procedures in this respect.
 - b) all employees are briefed on the importance of Personal Information and security and confidentiality of information obtained by them in the course of their work. Employees may attend training programmes and are provided with updates or practical guidance.
 - c) we control physical security in relation to the Personal Information that is contained at our facilities and restrict access to the site, buildings, computer rooms, office desk, technology areas, equipment and other facilities where unauthorised access by people could compromise our security.
 - d) all proprietary or confidential information, including Personal Information, is contained or stored on computer and any that is contained and stored on manual files are locked up and secure.
 - e) we may seek to control access to Personal Information, including existing procedures for authorising and authenticating users as well as software controls for restricting access and techniques for protecting data such as encryption. Encryption is used in connection with our payment facilities for customers.
 - f) we monitor and log access so as to assist in detection and investigation of security breaches and any attempted security breaches where they occur.
 - g) we maintain a business continuity plan as a contingency plan which identifies our business functions and assets (including personal data) which would need to be maintained in the event of disaster and set out the procedures for protecting and restoring them if necessary.

- h) in respect of detection and investigation of security breaches where they occur, we have in place relevant controls which should alert us to a breach in security. We endeavour to investigate every notified breach of security.
- 10.7 The Personal Information held by us is currently stored on a technology system, mass email and mobile number programme data base, individual account contact manager's systems together with the training booking spreadsheet, invoicing spreadsheet, Excel spreadsheets and paper form.
- 10.8 Our security measures are reviewed from time to time and appropriate measure taken to uphold the above.

Any changes to this Privacy Policy will be posted on this website.

Last updated: March 2015