

PRIVACY POLICY

ISSUED ON 01 MARCH 2014

Travelex Limited

Level 29, 20 Bond Street

Sydney NSW 2000

ABN 36 004 179 953

AFSL 222444



The world's foreign exchange company

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About this document

At Travelex, we are committed to ensuring the privacy of the personal information you have provided to us. We are bound by the Australian Privacy Principles (APPs), established under the Privacy Act 1998 (the 'Act'), which require you be informed about this process and how we may use and disclose the information you provide. The Privacy Policy sets out our policy on collecting and handling your personal information.

This Privacy Policy applies to Travelex Limited ("Travelex", "we", "us" or "our") ABN 36 004 179 953, AFSL No. 222444. The publication date of this Privacy Policy is 01 March 2014.

Contacting Us

For more information please see our website www.travelex.com.au. If you have any privacy related enquiries, you may contact us by:

- calling us on: 1800 440 039 (option 2);
- sending an email to: privacy@travelex.com.au; or
- mail addressed to: Privacy Officer, Travelex Limited, Level 29, 20 Bond Street, Sydney NSW 2000, Australia.

When will we collect personal information from you?

We may collect personal information from you in the following circumstances:

1. When you request a product or service

The type of product or service requested by you will determine the types of information that we will collect. The information may be supplied directly by you when you call us, when you transact via our retail stores or online/mobile channel or when you deal with our partners or agents who sell you our products or services.

2. When you apply for a position with us

If you apply for a position with us we will collect personal information as part of the recruitment process. We only seek your sensitive information with your consent.

3. As a consequence of a regulatory requirement

We may be required to collect your personal information as a consequence of a regulatory requirement such as under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act).

4. When you join the Travelex Rewards Program

We collect your personal information when you register to become a member of the Travelex Rewards Program via www.travelexrewards.com or complete a form at one of our stores.

5. When you voluntarily participate in a customer or employee survey

Surveys provide you with a chance to tell us how we are doing so we can improve on our products and services or address our employee needs.

6. We use technology to collect information from you

a) Video surveillance

Video surveillance is utilised in our branches to protect you and our staff. These images may constitute personal information for the purpose of the Act and are kept for a limited period of time. Notifications are displayed at our retail stores wherever the CCTV system is in use.

b) Cookies

When you visit or interact with us on our website, mobile site or partner sites, we send cookies to your device to identify the browser type and Internet Protocol address. A notification is displayed on our sites to alert you of the use of cookies.

c) Facial recognition

Some of our stores may use facial recognition digital technology. If used, our stores will have notifications advising that this technology is in use. The technology does not record or store any identifiable digital images. We do not disclose any data to third parties and use such information solely for market research to help us enhance our products and services.

The above list is not exhaustive as there may be other situations or circumstances in which we may be required to collect personal information from you. We will endeavour to notify you when we collect your personal information before, during or as soon as practicable. We will not collect any personal information from you except when you have knowingly provided that information to us or you have authorised a third party to provide that information to us.

Types of personal information we may collect from you

The information collected will generally be records of information that identifies you, such as your name, date of birth, address, telephone number, email, CCTV image, ID copy, or any other information that may be required for payment or identification purposes.

If you do not provide us with the information asked for we may not be able to provide the product or service you have requested.

Use of your personal information

We will only collect personal information that is reasonably necessary for, or directly related to, one or more of our functions and activities such as provision of the products and services you have requested. As a general rule we do not collect sensitive information. However if we do, we will seek your consent before collection. We will not use information about you other than for a purpose made known to you, a purpose you would reasonably expect, a purpose required, authorised or permitted by law, or a purpose otherwise authorised by you. These purposes include:

- Verification of your identity in order to provide the products or services you have requested;
- Administration of those products and services;
- Compliance with laws and regulations; and
- Providing you with information about products and services from companies within the Travelex Group that are most relevant to you.

Disclosure of your personal information

We may disclose your personal information in the following circumstances:

- Where we have contracted an external organisation to provide us with support services. Such services may include but are not limited to processing applications or orders, marketing support, market research, debt collection, insurance, information technology arrangements, records management, regulatory monitoring and screening.
- To related companies within Travelex Group with an intention to better understand your needs and provide you with information about products and services from across the Travelex Group that are most relevant to you;
- To comply with our legal obligations; and
- Where we suspect that unlawful activity has been or may be engaged in and the personal information is a necessary part of our investigation or reporting of the matter.

We may disclose your personal information only with your consent in the following circumstances:

- Where organisations cooperate with us in offering products and services such as Co-Brand Partners (where the co-branded partner's privacy policy applies to the use of your information);
- To service providers such as credit reporting agencies in order to conduct credit and/or compliance verification checks; and
- To anyone else you authorise us to disclose information to, from time to time.

Only information pertinent to the supply of our products or services is provided and strict confidentiality requirements are adhered to. Where personal information is disclosed to an external company operating in a foreign country, we will take all reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to your information. The overseas recipient locations may include but are not limited to United States, United Kingdom, India and Luxembourg.

Further, we take our obligation to protect your information seriously and only deal with ethical suppliers and business partners who demonstrate similar values, and are bound by the APPs or are subject to privacy laws of the same standard as Australia.

Quality of the Personal Information

We collect and verify your information directly from you, or from independent specialist sources, thereby upholding the quality and accuracy of your personal information.

Before we use or disclose your personal information, we will take reasonable steps to ensure that your personal information is accurate, complete, relevant, up-to-date, and is not misleading. If you believe the information we hold about you is inaccurate, incomplete or out-of-date, contact us and we will endeavour to either correct the information in our systems, or if necessary, discuss alternative action.

Storage and Security of Information

Travellex is committed to keeping secure the personal information you have provided to us. We will take all reasonable steps to protect your personal information from loss, misuse, unauthorised access, modification or disclosure. For example, your personal information is stored in secure premises and access to these premises is strictly controlled.

We understand our customers require peace of mind when it comes to the security of using the Internet. We use modern security measures such as secure firewalls, servers, databases and data encryption to safeguard the personal information provided by you.

We will not keep your information for longer than necessary, and where we no longer need your information, we will take reasonable steps to destroy or de-identify it.

Access and Corrections to your personal information

You have the right to access the personal information we hold about you. If you wish to access your information then we ask you to contact us (see 'Contacting us' above). We will need to verify your identity prior to meeting your requests. Unless a lawful exception applies, we will endeavour to grant you access to personal information which we hold about you within 30 days.

If you find that the information we hold about you is inaccurate or out-of-date then we will endeavour to correct it within 30 days upon receiving your request in writing.

In the event that we are unable to grant you access to your personal information, or are unable to correct your personal information, we will provide you with a written explanation as well as the complaint mechanism available to you. Exceptions to this include:

- where providing access will provide a serious threat to life or health of any individual or pose an unreasonable impact on the privacy of an individual;
- your request for access or correction is frivolous or vexatious;
- where information relates to existing legal proceedings between us and you; or
- where providing access would be unlawful or may prejudice an investigation of possible unlawful activity.

How to make a Privacy related complaint

If you wish to complain about any breach or potential breach of this Policy or the Australian Privacy Principles, you should contact us (see 'Contacting us' above) and request that your complaint be directed to the Privacy Officer.

We will use our best endeavours to respond and resolve any complaint to your reasonable satisfaction. If you are unhappy with our response, you may apply to the Office of the Australian Information Commissioner (OAIC) to have your complaint investigated.

For more information on how you may lodge a complaint with the OAIC, please contact the Commissioner's hotline service on 1300 363 992, or visit their website on www.oaic.gov.au.

Changes to this Policy

Travellex may make changes to this Policy from time to time and for any reason including, but not limited to, the introduction of new legislation. Any changes to this Policy will be updated regularly through brochures and/or our website.

Links to other sites

Travellex websites may contain links to other websites whose operators may or may not adhere to a Privacy Policy or be governed by privacy laws. We are not responsible for the content or practices of websites operated by third parties that are linked to our sites. These links are for the user's convenience only. Links to third party sites do not constitute approval by us of the content, policies or practices of those third party sites. Once you have left our site via such a link, you should check the applicable Privacy Policy of that site.

We may establish relationships with business partners that allow visitors to our website to link directly to sites operated by these partners. Some of these sites may be "co-branded" with Travellex; however these sites may not be operated or maintained by us or on our behalf. These sites may collect personal information from you that may be shared with us. This Privacy Policy will apply to any personal information we obtain in this manner.

Use of cookies

We collect online activity information through the use of cookies. When you visit or interact with us on our website, mobile site or partner sites, we send cookies to your device.

A cookie is a small amount of data that is sent to your computer or mobile device (referred to here as a “device”) browser and is stored on your device’s hard drive. Please note unless you have adjusted your browser settings to refuse cookies, our system will automatically issue cookies when you access our website. A notification is displayed on our website to alert you of the use of cookies.

We use cookie information to track usage patterns and provide us with statistics to analyse and improve our website for a better browsing and usage experience. Such information can be the number of users who visit our site, the date and time of visits, the number and type of pages viewed and navigation patterns.

Our website also uses remarketing feature in Google AdWords to reach out to people who previously visited our website. Remarketing involves classifying users according to how they use our website and creating an audience segment for Google to show our targeted ads on sites across the internet. For example, if you access information about a particular type of currency on our website, you will receive information relevant to that currency within a specific time of visiting our website. It is important to note that remarketing targets the audience and not the individual user. Cookies do not identify individual users, although they do identify a user’s browser type, Internet Protocol address, location, screen size, etc.

For 3rd party cookies such as advertising cookies sent from Google AdWords, Yahoo or Bing, you can choose to permanently opt out by visiting Google’s Ads Settings and downloading the browser plugin, or visiting Yahoo or Bing’s websites to turn off their 3rd party interest based ads. You also have the ability to configure your browser to accept or decline all cookies or notify you when a cookie is sent. For more information on disabling and enabling cookies you should search or lookup ‘Cookies’ in your Operating System Documentation. If you disable or reject some or all cookies you may not be able to view or use parts of our website, and you may not have full access to all of the applications and information on our website.

Opting out of marketing, promotions or related activities

You may be contacted by mail, telephone or email regarding our products, promotions, newsletters, customer surveys and similar materials that we may conduct or distribute from time to time. If you do not wish to receive any such communications, you may advise us that you wish to opt out:

- By utilising the unsubscribe (opt-out) functionality or link provided in the direct marketing communications we send you;
- by sending us an email to unsubscribe@travelex.com.au; or
- by mail addressed to The Privacy Officer, Level 29, 20 Bond Street Sydney NSW 2000.