



## **PRIVACY POLICY**

### **Policy Statement**

In this policy, United Global One Pty Ltd is referred to as “United Global Pay” “UGP” “we” “our” or “us”. The purpose of this privacy policy statement in general terms is to describe United Global One Pty Ltd t/as United Global Pay (ABN 71 617 147 627) privacy policy and practices on how customer Personal Information is collected, used, maintained and disclosed. United Global Pay respects and is committed to protect the privacy and confidentiality of our customer Personal Information. In addition, United Global Pay is also bound by the Privacy Act 1988 and the Australian Privacy Principles (APPs).

### **Collection of Personal Information**

Generally United Global Pay will collect Personal Information directly from you when you deal with United Global Pay either on-line, by email, via our website, or facsimile. We may also collect data and information from you to provide us with feedback or when we invite you to complete surveys. Following are Personal Information that United Global Pay collects:

- Data and Information such as customer’s full name, beneficiary’s full name, residential address of sender and beneficiary, Government issued ID, gender, date of birth, telephone number, email address, employment information, sender and beneficiary bank account details, SWIFT code, and nationality;
- An additional ID document, Debit/Credit Card number, or Bank Account Statement and details for significant transactions;
- Reports and other customer Personal Information that United Global Pay may receive from third party agencies;
- All mandatory data and information where United Global Pay is required to comply with Anti Money Laundering and Counter Terrorism Financing Act 2006, AML/CTF Rules, laws and other regulatory requirements, including information required for identification purposes and for purposes relating to prevention of fraud, crime and illegal activities.

United Global Pay may be unable to provide requested product or service if you do not agree or consent to allow us to collect or obtain certain Personal Information about you, including but not limited to the source of your income/money and your legitimate reason of using our remittance or money transfer service.

United Global Pay will assume that you have consented or agreed to the collection of all data and information which are provided to us for use in accordance to this Policy, unless you inform us or tell us otherwise.



## **Agent of Third Parties**

We collect your Personal Information for both our internal purposes and also on behalf of the parties for whom we act as agent, for their own internal purposes. Therefore, by consenting under this statement means that you have also consented that your Personal Information being used by us or being provided and used equally to the parties whose products and services we sell.

We are more than happy to provide you more information about the third parties we act as agent, by sending your query to us at [contact@unitedglobalpay.com](mailto:contact@unitedglobalpay.com), or, via live chat in our website.

## **Uses of Customer Personal Information**

United Global Pay may use and disclose your Personal Information for the purposes for which it was collected, or for a related purpose such as any or more of the following purposes:

- To identify, verify, and determine the eligibility of customers conducting transactions with us;
- Reporting and compliance obligations;
- Identifying fraud, crime and illegal activities;
- Internal database, accounting, and administration;
- To complete bank deposits and withdrawals;
- Seeking feedback from you as our customer;
- Marketing Purposes, including surveys.

United Global Pay will not use or disclose or sell, or rent or lease customer Personal Information to any third party agencies except as stated in this Policy.

United Global Pay will take reasonable steps to immediately inform you when we collect relevant personal information about you from Third Party agencies, or someone else.



## **Disclosure of Customer Personal Information**

We may disclose Personal Information of current and former customers to affiliated and non-affiliated third party agencies in the following cases:

- to United Global Pay business partners that perform services on United Global Pay behalf under written agreements which restrict use of customer Personal Information to the limited purposes for which it is provided to them and to refrain from further use or disclosure unless permitted by laws;
- to our affiliates who are permitted to disclose and use the Personal Information only to the extent that we may disclose and use the Personal Information under this Policy;
- to United Global Pay's attorneys, accountants, auditors and consultants;
- to our IT systems affiliates, including our web, network, and data entry service providers;
- to prevent or protect against actual or potential fraud, suspicious transactions, unauthorised transactions, claims or other liabilities;
- to various government, regulatory or law enforcement agencies to the extent permitted or required by law, or to comply with applicable legal requirements;
- to comply with civil, criminal or regulatory investigations, or judicial process, subpoena, summons or warrants by federal, state or local authorities.

Please note that your Personal Information may be transferred across national borders and overseas for the purpose of processing your transaction, data consolidation, storage, and data management.



## **Procedures to Safeguard Personal Information**

United Global Pay restricts access to Personal Information by only allowing the Compliance Officer to access, use, amend or update the Personal Information database. United Global Pay maintains physical, electronic and procedural safeguards to safeguard customer Personal Information.

United Global Pay protects the customer Personal Information by using password, firewalls, and other security technology. United Global Pay employees are strictly required to protect the confidentiality of your Personal Information.

We conduct periodical review and audit for our business and security procedures in order to best protect our customers' Personal Information.

## **Retention and Accuracy of Personal Information**

United Global Pay will only keep Personal Information on internal database for as long as it is required to provide customers with products and services, and to meet relevant legal requirements.

To comply with AML/CTF Act and its relevant rules and regulations, United Global Pay must retain our customer Personal Information for 7 years.

We will destroy the customer Personal Information when we no longer need the relevant customer Personal Information.

We periodically ask customers who are dealing with us to ensure the accuracy of our Personal Information and to update any Personal Information that may have changed.

## **Access and Correction**

As our customer, you may request in writing to access your Personal Information that we hold, any time, in a timely manner, by contacting our Compliance Officer through:

- Email: [ugpcomplianceofficer@unitedglobalpay.com](mailto:ugpcomplianceofficer@unitedglobalpay.com)
- Mail: our addresses as in our website
- Phone: our telephone numbers in our website
- Live Chat: Monday to Friday 9.30 am to 6 pm in our website

You may also request United Global Pay on incorrect, inaccurate, incomplete, out of date, or misleading information to be corrected. We will take appropriate actions to process your request, amend the relevant information, inform you about the correction, and if it required by Act, we will also inform the correction to any third party of whom the information has been disclosed.

United Global Pay will respond to your request for access to your Personal Information within a reasonable period (within 30 days) after the request is made. We shall give access to your Personal Information in the manner requested by you, if



it is reasonable and practicable to do so, or otherwise, the requested Personal Information will be mailed or emailed to you.

Following are circumstances which may preclude United Global Pay to give you access to all of your Personal Information:

- United Global Pay is prohibited by law to provide you with the access; or denying access is required or authorised by or under an Australian law or a court/tribunal order;
- United Global Pay reasonably believes that giving the access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- the provision of information would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings between United Global Pay and the individual, and would not be accessible by the process of discovery in those proceedings;
- giving access would reveal the intentions of the relevant entity in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- giving access would be unlawful;
- United Global Pay has a reason or reasons to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in, and giving access would likely be prejudice the taking of appropriate action in relation to the matter;
- giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- the request of access would reveal or affect our evaluative information and commercially sensitive decision making process.

When we refuse to give you access or to amend the relevant information, you will receive a written notification letter which sets out our reasons and decisions. The notification letter will also consist of mechanism to complain about your refusal.

### **Complaints Policy**

Please do not hesitate to contact us when you have a complaint. United Global Pay takes this matter seriously. We will listen, acknowledge, understand, and do everything we reasonably can to solve the problem.

We will record your complaint, inform you the progress, and provide a final response to you within 30 business days. Following are our complaint procedures:

- Stage 1: Contact us immediately in person, email ([contact@unitedglobalpay.com](mailto:contact@unitedglobalpay.com)), or by phone. You need to provide us your complaint in writing to help us efficiently resolving your complaint.



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- Stage 2: Our Compliance Officer will conduct an internal investigation, inform you with the progress, and contact you with the results within 30 business days.
- Stage 3: If you are still unsatisfied with our Compliance Officer solution to the matter, you can refer the matter to the Australian Financial Complaints Authority to solve the matter in accordance to their rules and policy.

### **Cookies**

We may use cookies to analyse and to gather important analytical data for the purpose of improving our website and services.

United Global Pay cannot use cookies to access your computer or any information about you. Most of web browsers automatically accept cookies, however, you can usually modify your web browser setting to decline cookies if you prefer.

Please note and remember that disabling cookies may limit or may prevent your access to use full range of services available on our website.

### **Links to Other Websites**

The United Global Pay website may provide links to other websites for customer convenience and information. We do not endorse or make any representatives and do not control those other sites or their privacy practices. We are not responsible for the privacy practices or the content of such websites. It is your own responsibility as customer to review the other sites privacy policy before submitting your Personal Information.

### **Notification of Privacy Policy Changes**

We regularly review this Privacy Policy. We reserve the right to amend, change or update our Privacy Policy at any time without prior notice. Updates or amendments will be posted on our website immediately.

### **Feedback**

United Global Pay values its customers' comments or opinions about this Privacy Policy. Should you have any queries or comments please email to us at [contact@unitedglobalpay.com](mailto:contact@unitedglobalpay.com).