
PRIVACY POLICY

Date: 26/08/2025

At SVIT PAYMENTS PTY LTD (“Company”, “we”, “our”, “us”), we respect your privacy and are committed to protecting the personal information you provide to us. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information in compliance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), and, where applicable, the General Data Protection Regulation (GDPR).

1. INFORMATION BEING COLLECTED

We collect the following types of personal information:

- Identification details (name, date of birth, nationality, ID/passport details, residential address);
- Contact details (email, phone number, postal address);
- Financial information (bank account details, payment information, transaction history);
- Employment information (for due diligence purposes);
- Information required for AML/CTF compliance, including KYC documents, beneficial ownership details, and source of funds/wealth;
- Technical information (IP address, device type, login logs, and website usage data).

2. METHODS OF COLLECTING INFORMATION

Directly from you when you apply for our services, register an account, or communicate with us;

From third-party verification providers (e.g., KYC/AML service providers, sanctions lists, credit reference databases);

Automatically, when you use our websites or applications (see also our Cookies Policy).

3. USE OF INFORMATION

We use your personal information for the following purposes:

- To provide and manage our payment and wallet services;
- To perform identity verification (KYC) and comply with AML/CTF obligations;
- To process transactions and maintain accurate financial records;
- To improve our services, user experience, and security;
- To comply with applicable laws, regulations, and reporting obligations (e.g., AUSTRAC, tax authorities);
- To communicate with you regarding services, support, or legal updates.

4. DISCLOSURE OF INFORMATION

We may disclose your personal information:

- To regulators and supervisory authorities (e.g., AUSTRAC, ASIC) where required by law;
- To service providers (IT, cloud storage, KYC/AML providers, auditors, legal advisors) under confidentiality obligations;
- To affiliated entities within our corporate group, strictly for legitimate business purposes;
- Where required by court order, law enforcement, or applicable regulations;
- To third parties with your explicit consent.

5. CROSS-BORDER TRANSFERS

If your personal information is transferred outside Australia (e.g., to cloud or verification service providers located overseas), we will take reasonable steps to ensure that the recipient complies with privacy standards equivalent to the Australian Privacy Principles.

6. DATA RETENTION

We retain personal information for as long as necessary to provide services and meet legal obligations.

In accordance with AML/CTF Act 2006, certain records (KYC and transaction data) must be kept for a minimum of 7 years after the business relationship ends.

7. SECURITY OF INFORMATION

We implement appropriate technical, organisational, and administrative safeguards to protect personal information against unauthorised access, loss, misuse, or alteration.

8. CUSTOMER'S RIGHTS

Subject to applicable law, you may:

- Request access to your personal information;
- Request correction of inaccurate or outdated data;
- Request deletion of your data (where legally permissible);
- Withdraw consent for certain processing activities;
- Lodge a complaint with the Office of the Australian Information Commissioner (OAIC) or, if in the EU, with your local data protection authority.

9. UPDATES TO THIS POLICY

We revise and update this Privacy Policy at least annually. Any updates will be published on our website with the effective date indicated.

10. CONTACT US

For questions, requests, or complaints about this Privacy Policy, please contact us:

Legal name: SVIT PAYMENTS PTY LTD

Registered Address:

23 Salesforce Tower Sydney Place', Level 22, 180 George Street,
SYDNEY NSW 2000

Email: legal@flipto.org

AUSTRAC Registration No.: 100843001

Peter Mathers

Director

Signature

