

Dolphin Technology Pty Ltd Privacy Policy

1. Introduction Dolphin Technology Pty Ltd is committed to protecting the privacy of our customers, clients, and website visitors. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information in accordance with the Australian Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

2. We may collect personal information from you in various ways, including when you:

- Visit our website
- Download or use our accompanying App or Web-based functions
- Contact us via email, phone, or social media
- Make use of our products or services
- Sign up for newsletters, promotions, or events

2.1 The types of personal information we collect may include:

- Name and Contact details (phone number, email, address)
- Payment information, financial documents including but not limited to, Source of Wealth or Funds,
- Business details, including business addresses, affiliates, key stakeholders and UBOs
- Information that would assist us in assessing your risk levels like past business history, PEPs, sanctions, Credit history
- Technical information regarding the device you are using to access our products and services including but not limited to, smartphones, tablets, PCs, browser types, IP locations, mac addresses.
- Any other information we deem relevant to your dealings with us
- Any other information we deem to fulfill our AML/CTF obligations

3. Use of Personal Information We may use your personal information for the following purposes:

- To provide our products and services
- To communicate with you about orders, inquiries, and support
- To process transaction, settlements, claw-backs, and refunds
- To send marketing materials (where consent is given)
- To improve our, products, and services
- To comply with legal obligations

4. Disclosure of Personal Information We may share your personal information with:

- Third-party service providers (e.g., payment processors, delivery partners, IT support)

- Regulatory or law enforcement authorities where required by law
- Business partners where necessary to continue to deliver our services

We will not sell, rent, or trade your personal information to third parties for marketing purposes.

5. Data Security We take reasonable steps to ensure the security of your personal information, including protection against unauthorized access, loss, or misuse. However, no online transmission is completely secure, and you provide information at your own risk.

6. Overseas Data Storage and Transfers Your personal information may be stored or processed outside Australia, including by third-party service providers. Before disclosing personal information overseas, we take reasonable steps to ensure that the recipient complies with the Australian Privacy Principles or is subject to laws that offer similar protection. By using our services, you consent to such overseas transfers in accordance with this policy.

7. Access and Correction You have the right to access the personal information we hold about you and request corrections if it is inaccurate, incomplete, or outdated. To request access or correction, please contact us using the details below. We may require you to verify your identity before providing access. In some circumstances, we may refuse access where permitted by law, and we will notify you of the reasons for refusal. It is your obligation to ensure that the information provided to us is true, accurate and up to date.

8. Cookies and Online Tracking Our website may use cookies and tracking technologies to enhance user experience, analyse website traffic, and personalize content. You can manage your cookie preferences through your browser settings.

9. Complaints and Contact Details If you have any concerns or complaints about our handling of your personal information, please contact us at:

Dolphin Technology Pty Ltd
1919 & 1920/644 Chapel St, South Yarra VIC, 3141.
customersevice@huepay.com.au

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au.

10. Changes to This Privacy Policy We may update this Privacy Policy from time to time. The latest version will be available on our website, and we encourage you to review it periodically.