

BillWill Privacy Policy

Last updated: 11.03.2024

1. Policy scope

In the course of carrying out our activities, BILL WILL PTY LTD (ACN 674 861 897) (**BillWill, we, us or our**) will collect, store, use and disclose personal information. BillWill is committed to the protection of your personal information and to compliance with applicable privacy laws.

2. Personal information

Personal information is information or an opinion about an identified or reasonably identifiable individual, whether or not the information or opinion is true and whether or not the information is recorded in a material form.

3. Types of personal information we collect and hold

3.1 We collect and hold personal information about individuals in the course of undertaking our business, providing our expertise and services, and purposes connected to those activities (together, our **activities**).

3.2 Consistent with our activities, the types of personal information we may collect, and hold includes the following.

- (a) *Identity and contact details.* We may collect your basic identifying information such full names, addresses, telephone numbers, email addresses, dates of birth, dates of death, job titles, and other identifying and contact information.
- (b) *Financial information.* We may collect your financial information, including bank account details and credit card information.
- (c) *Account and billing information.* We may collect your account names, account numbers username and password information, charges and recurring amounts on your account, billing address for your memberships, subscriptions, utility bills and other online accounts.
- (d) *Legal documentation.* We may collect your death certificate or proof of death, power of attorney and other legal documents.
- (e) *Executor, custodian or next of kin information.* We may collect information about your capacity as executor or custodian if you are managing the financial affairs of somebody else, including the identity of that person, their relationship to you, or the fact that you are managing the financial affairs of somebody else.
- (f) *Preferences and instructions.* We may collect any specific instructions or preferences regarding the management of your bills after death, including preferences for notification methods or frequency of updates.

- (g) *Consent and authorisations.* We may collect your consent to access and manage an individual's accounts, including via Open Banking consents, and to communicating with third parties on your behalf.
- (h) *Digital information.* We collect text of written and oral communications gathered in the course of our interaction with you, including where you interact on live-chat, social media and emails, provide feedback and online reviews and other information from your interactions with us online, cookie information, IP address, URLs, search histories and other associated information.

4. How we collect and hold personal information

4.1 The ways we may collect your personal information are as follows.

- (a) *Directly from you.* We may collect personal information directly from you in the course of undertaking our activities, from communications via our application, phone, email and text, as well as from our website and other online platforms, including by deploying cookies.
- (b) *From publicly available sources.* We may also collect personal information from publicly available sources of information, including via websites, directories, and social media channels.
- (c) *From your nominated custodians.* We may also collect your personal information from your nominated family, spouse or next of kin for the purposes of engaging with our activities.
- (d) *Through Open Banking.* We may collect your personal information when you use Open Banking services and instruct your bank to share data with us, which may include financial transaction data and account information, when you have given your explicit consent and in compliance with applicable laws and regulations.

4.2 Personal information is held securely, is subject to various security protections and is held only for as long as the information remains relevant to the purpose for which it was collected.

5. Purposes for which we hold, use and disclose personal information

5.1 We will not use or disclose personal information for any secondary purpose, unless that secondary purpose is related to the primary purpose for which we have collected that information, and you would reasonably expect the disclosure in the circumstances, or unless you consent to that use or disclosure.

5.2 The purposes for which we collect, hold, use and disclose information may include:

- (a) conducting our business, which includes:
 - (i) assisting individuals with their account management before and after their passing, including by delivering a 'house-moving' service i.e. initiating account closures, account transfers, switching plans, or any other necessary financial management activities on behalf of individuals; and
 - (ii) assisting individuals and their estates, custodians or authorised representatives to organise and manage the individual's billing and financial affairs before and after an individual's passing; and

- (iii) engaging the third party services of individuals to facilitate any of the above.
- (b) to communicate information about our activities; and
- (c) to provide you with information or advertising relating to our activities (including targeted advertisements) or marketing communications we believe may be of interest to you;
- (d) to improve and optimise our platforms (including our websites) and services;
- (e) for our internal administrative, research, planning and marketing purposes; and
- (f) to comply with legal obligations and protect our legal interests and rights (including our intellectual property rights).

5.3 We may disclose personal information to our affiliates and related bodies corporate.

5.4 In certain circumstances, it may be necessary for us to disclose your personal information to third parties in order to assist us in providing our services, or where disclosure is required by us to meet our legal and regulatory obligations. These third parties may include:

- (a) third party service providers, including services providers who assist us with our activities and to those whom you have an account with;
- (b) third party technology and marketing partners, including but not limited to LinkedIn, Facebook (including for their custom audience and lookalike audience tools), Hubspot (including for our customer relationship management), Amazon Web Services, Microsoft Azure and Google (including Google Analytics) and other technology and marketing service providers, or their respective marketplaces;
- (c) government and law enforcement agencies and regulators; and
- (d) entities established to help identify illegal activities and prevent fraud.

5.5 We may also disclose your personal information to anyone authorised by you, or to whom you have provided your consent.

5.6 While our disclosure of personal information to such third parties is governed by our Privacy Policy, such third party's use of your personal information, including contacting them with any queries you have about the personal information they hold and how those parties use your personal information will be governed by their privacy policy. It is your sole responsibility to review such privacy policies.

6. Changes to this Privacy Policy

We will review and update this Privacy Policy from time to time as needed without notice. Therefore, you should review the terms of this policy periodically to make sure that you are aware of how we collect, hold, store and use personal information.

7. Retention, access and correction

7.1 We will only keep records of your personal information as long as they are still necessary for the purposes listed above for which we collected such personal information.

- 7.2 We will take all reasonable steps to ensure any personal information we collect, use or disclose is up to date and accurate. If you believe personal information that we hold about you is not up to date or accurate, you may ask us to correct it.
- 7.3 You may ask us to provide you with details of the personal information we hold about you, and copies of that information. We will respond to your request and provide you with the data in accordance with applicable privacy laws.
- 7.4 If we provide you with copies of the information you have requested, to the extent permitted by law, we may charge you a reasonable fee to cover the administrative costs of providing you with that information.
- 7.5 Please direct all request for access and correction to enquiries@billwill.com.au.

8. Overseas disclosure

- 8.1 We do not, in the course of conducting our activities, disclose personal information to overseas entities.
- 8.2 Regardless of the location of our processing, we will impose adequate data protection safeguards and implement appropriate measures to ensure that your personal information is protected in accordance with applicable data protection laws.

9. Complaints

- 9.1 If you consider a breach of the Privacy Act 1988 (Cth) has occurred, you may direct your query to our Privacy Officer using the details set out below and we will attempt to resolve your complaint.
- 9.2 If you do not consider our response satisfactory, you may contact the Australian Privacy Commissioner at its website www.oaic.gov.au or by telephone on 1300 363 992.

10. Contacting us

If you have any questions about this Privacy Policy and would like further information, please contact us at enquiries@billwill.com.au.