

# Nexpay Pty Ltd

## Privacy Policy

---

ABN 56 153 910 984 · ACN 153 910 984 · AFSL No. 560782

Issue Date: 29 May 2026 · Version 3.0

This Privacy Policy explains how Nexpay Pty Ltd (ABN 56 153 910 984) and its group entities (**NexPay, we, us, our**) collect, use, hold, disclose and protect personal information. It applies to our websites and to the cross-border, education-related payment services we provide to students, parents, education agents and education providers.

NexPay is committed to handling personal information in accordance with the laws of the jurisdictions in which it operates, including the **Privacy Act 1988 (Cth)** and the Australian Privacy Principles (**APPs**) in Australia, the **UK and EU General Data Protection Regulation (GDPR)** in the United Kingdom and European Union, and the **Personal Information Protection and Electronic Documents Act (PIPEDA)** in Canada. Sections 1–13 set out our general approach; section 14 sets out additional rights for individuals in the UK, EU and Canada.

### 1. The personal information we collect

Depending on the service, we may collect:

- your name, contact details, nationality, date of birth and residential address;
- identification and verification information, which may include images of government-issued identity documents and a photograph or "selfie", and the biometric data derived from them for identity-matching;
- financial and payment information, including bank account details, card information (handled by PCI-DSS-certified processors — we do not store full card numbers), the amount, currency, purpose and route of your payment, and supporting documents such as a Letter of Offer, invoice or visa;
- information about the education agent, provider or business you deal with and your relationship with them; and
- technical information when you use our websites or app, such as IP address, device and usage data, collected using cookies and similar technologies.

Some of this information is **sensitive information** (for example, biometric information used for identity verification). We collect it only where it is reasonably necessary for our services or required by law — in particular to meet our anti-money laundering and counter-terrorism financing obligations — and, where required, with your consent.

NexPay does not generally require your **tax file number (TFN)**. If a TFN is provided to us, we handle it in accordance with the Privacy (Tax File Number) Rule and do not use it as a general means of identifying you.

### 2. How we collect personal information

We collect personal information directly from you wherever practicable — for example when you create an account, make or receive a payment, or contact us. We may also collect information from others involved in your payment, such as an education agent or provider acting on your behalf,

identity-verification and screening providers, banks and our regulated payment partners. If you do not provide the information we request, we may be unable to provide our services.

### 3. Why we collect, hold and use personal information

We use personal information to:

- establish and administer your account and process and track your payments;
- verify your identity and meet our AML/CTF, sanctions, fraud-prevention and other legal obligations;
- communicate with you about your payments and provide customer support in your language;
- keep our records, manage risk and improve and secure our services; and
- send you information about our products and services, where permitted (see section 7).

### 4. Automated tools and AI-assisted features

We use automated tools to help verify identity, screen for sanctions and fraud, and operate certain support and product features (including AI/large-language-model features). Where these tools process personal information, we apply measures such as minimisation and redaction of identifying data before transmission to a service provider. Decisions that have a legal or similarly significant effect on you — such as declining a payment for compliance reasons — involve human review, and you may ask us about, and seek review of, such a decision (see section 14).

### 5. When we disclose personal information

We disclose personal information only as needed to provide our services and meet our legal obligations, including to:

- NexPay group entities in Australia, the United Kingdom, Canada and the countries where we have local offices;
- our regulated banking, foreign-exchange and payment partners, and intermediary and beneficiary banks, to effect your payment;
- identity-verification, sanctions/PEP-screening, card-processing, cloud-hosting, communications and analytics providers who process information on our behalf under contract;
- the education agent or provider connected to your payment, so far as needed to confirm and reconcile it; and
- regulators, law-enforcement, courts and government bodies where required or authorised by law.

A current list of the third-party sub-processors that handle personal information on our behalf, the data they process and where it is hosted, is published on our Trust & Regulatory page. We do not sell your personal information, and we do not disclose it to third parties for their own direct marketing.

### 6. Overseas disclosure and data hosting

NexPay operates internationally, so your personal information may be disclosed to, and stored in, countries other than your own — including Australia, the United Kingdom, the European Union, Canada and the United States. Our primary application data is hosted in Australia (Sydney) with our cloud provider; some providers process data in other regions. Where we transfer personal information across borders we take reasonable steps to ensure it is protected, using mechanisms

such as contractual safeguards (including GDPR standard contractual clauses and the UK IDTA) and by requiring service providers to protect it consistently with this Policy.

## 7. Direct marketing

We may use your contact details to send you information about our products and services where you would reasonably expect us to, or where you have consented. Every marketing message includes a simple way to opt out, and you can opt out at any time by emailing [support@nexpay.com.au](mailto:support@nexpay.com.au). We will still send you service and regulatory communications relating to your payments. We will not provide your information to other organisations for their direct marketing.

## 8. Security of personal information

We take reasonable steps to protect personal information from loss, misuse, interference and unauthorised access, modification or disclosure. Our controls include encryption of data in transit and at rest, access restricted to authorised personnel on a least-privilege basis, multi-factor authentication, redaction of identifying data from logs, and monitoring. No system is completely secure, and we encourage you to keep your account credentials confidential. Where information is no longer required, we take reasonable steps to destroy or de-identify it.

## 9. Data breaches

If a data breach occurs that is likely to result in serious harm, we will notify affected individuals and the relevant regulator as required — including the Office of the Australian Information Commissioner under the Notifiable Data Breaches scheme, and the equivalent UK, EU and Canadian authorities where applicable.

## 10. Accessing and correcting your information

You may ask us for access to the personal information we hold about you, and to correct it if it is inaccurate, out of date or incomplete. We do not charge for reasonable access and correction requests. In limited circumstances permitted by law we may decline access — for example where it would unreasonably affect another person's privacy, relate to anticipated legal proceedings, or be unlawful — and if so we will explain why and how you can complain. To make a request, contact our Privacy Officer (see section 13).

## 11. How long we keep your information

We keep personal information only for as long as needed for the purposes described in this Policy or to meet our legal obligations (including AML/CTF record-keeping, which generally requires retention for at least seven years), after which we destroy or de-identify it.

## 12. Cookies

Our websites use cookies and similar technologies to operate the site, remember your preferences, and analyse usage. Most browsers let you refuse cookies, but some features may not work if you do. Our analytics providers may set cookies on our behalf; these do not, by themselves, identify you.

## 13. Contact us and complaints

To contact our Privacy Officer, or to make a privacy complaint, email [support@nexpay.com.au](mailto:support@nexpay.com.au) or write to Nexpay Pty Ltd, Level 12, 64 York Street, Sydney NSW 2000, Australia (telephone +61 2 9078 7967). We will acknowledge and investigate your complaint and respond within a reasonable time.

If you are not satisfied with our response, you may complain to the relevant privacy regulator: in **Australia**, the Office of the Australian Information Commissioner (oaic.gov.au, 1300 363 992); in the **United Kingdom**, the Information Commissioner's Office (ico.org.uk); in the **EU**, your local supervisory authority; and in **Canada**, the Office of the Privacy Commissioner of Canada (priv.gc.ca).

#### 14. Additional rights — UK, EU and Canada

If you are in the United Kingdom, the European Union or Canada, you have additional rights in relation to your personal data, which may include the right to access, rectify, erase, restrict or object to processing, the right to data portability, the right to withdraw consent, and the right not to be subject to a decision based solely on automated processing that produces a legal or similarly significant effect. To exercise these rights, contact our Privacy Officer using the details in section 13. Where we rely on consent you may withdraw it at any time; where we rely on other lawful bases (such as performing our contract with you, complying with our legal obligations, or our legitimate interests in preventing fraud and financial crime) we will explain this on request.

We do not knowingly collect personal data from children under 16 without appropriate consent. Where our services are used in connection with a student who is a minor, we collect the information needed to process the payment and to meet our legal obligations, with the involvement of a parent, guardian or agent.

#### 15. Changes to this Policy

We may update this Policy from time to time. The current version is always available on our website, and we will indicate the issue date above.