



## **Student Financial Assistance Privacy Disclosure and Consent**

By electing to participate in the Student Financial Assistance Program, you acknowledge and consent to the following:

- DiviPay has been engaged by Western Sydney University (“*University*”) to provide expense management software and virtual card payment services (“*Services*”), an independent service, owned and operated by DiviPay Pty Ltd, of 2/80 Albion Street, Surry Hills, NSW 2010, Australia.
- During the Services DiviPay will collect personal information and other data from you, which may include:

**Contact and Account Registration:** When you create a Divipay account, you will be required to provide DiviPay with your name, email address, contact phone number, residential address and create a unique username and password. You will also be required to download the free DiviPay App from the Apple App Store or Android Play Store depending on your mobile device. You can also choose, but are not required, to provide DiviPay with a profile picture using your device’s camera. When you contact DiviPay through their phone hotline, web form or LiveChat, DiviPay will ask for identifying information such as your name, email address, your institution (Western Sydney University), and DiviPay status (e.g. a cardholder or administrator). DiviPay may also ask you to provide them with information about the reason you are contacting them.

**Know Your Customer (KYC) Compliance:** DiviPay has an obligation under the Anti-Money Laundering and Counter-Terrorism Financing Act (“AML/CTF Act”) to verify your identity before they can provide you with any financial services. Before using the DiviPay platform, you will be required to provide personal identification documentation such as (but not limited to) passport, drivers licence, University Photo ID, rates notice, rental agreement, etc. DiviPay may provide your personal information including the identification documentation you provide to its third party AML/CTF verification service provider, BronTech Pty Ltd (*trading as BronID*), of 125 York Street, Sydney, NSW 2000 in order to complete its identification and KYC compliance checks.

**Website Log Data and cookies:** DiviPay servers automatically record information created during your use of the Services. This data may include information such as your IP address, browser type, the referring domain, internet service provider (ISP), operating system, date/time stamp, clickstream data, and browser plug-ins. DiviPay uses cookies or similar technologies to retain user settings, analyse trends, administer the website, track users’ movements around the website, and to gather demographic information about you. You can control the use of cookies at the individual browser level.

- The personal information and data collected by DiviPay and its subcontractors in performance of the Services may be stored, processed or transferred outside Australia including but not limited to US, EU, Singapore and New Zealand.
- Under the current Services Agreement between the University and DiviPay, any data or information (including student’s personal information) collected by DiviPay in the performance of the Services is deemed the University’s confidential information which permits the University to govern its use (including disclosure to third parties) and destruction. DiviPay is not permitted to use the University’s confidential information for any other purpose other than in the furtherance of the performance of the Services.
- The University will receive from DiviPay your personal information and other data collected during your use of the Services. This includes the transaction history (including merchant IDs, expense categories and purchase amounts) on your DiviPay account. This information and data will be used by the

# WESTERN SYDNEY UNIVERSITY



University to administer financial assistance funds to you in accordance with the University's policies, guidelines and [Student Code of Conduct](#) (including any investigations regarding student misconduct under the [Student Misconduct Rule](#)). The University will manage any personal information collected from DiviPay in accordance with the [University's Privacy Policy](#) and [Privacy Management Plan](#).

- Under Australian Tax and other relevant legislation, DiviPay and its subcontractors are required to hold your personal information for up to 7 years even if you stop using the service. After the mandatory 7-year record keeping period DiviPay and its subcontractors are required to destruct all personal information and data collected from you in administering the service.
- If you do not consent to this Privacy Disclosure and Consent, you must contact the Student Assistance Fund at [Covid19hardship@westernsydney.edu.au](mailto:Covid19hardship@westernsydney.edu.au) to discuss alternative payment arrangements.