

VALET FINTECH GROUP LIMITED (VALET CARDS) PRIVACY POLICY

Jurisdiction: New Zealand (Privacy Act 2020)

Effective Date: 1st of December, 2025

Legal Entity: Valet Fintech Group Limited (NZBN: 9429053282101)

Brand: ValetCards (“we”, “us”, “our”)

1. INTRODUCTION

This Privacy Policy explains how Valet Fintech Group Limited (“ValetCards”) collects, uses, stores, discloses, and protects personal information in accordance with the **New Zealand Privacy Act 2020**.

By applying for, receiving, activating, or using ValetCards services or prepaid Visa cards issued by our **Licensed Issuer**, you agree to the practices described in this Privacy Policy.

2. SCOPE OF THIS POLICY

This Privacy Policy applies to:

- ValetCards onboarding and KYC processes
- ValetCards communication channels (including Telegram)
- ValetCards top-up processes
- Card issuance processes performed by the Licensed Issuer
- Card usage, authorisation, and transaction data

- Client support interactions
- Our website, systems, and databases

This Policy covers **all business clients and their authorised representatives or authorised card users.**

3. INFORMATION WE COLLECT

We collect the following categories of information:

3.1 Identity Information

- Full name
- Date of birth
- Nationality
- Passport information
- Driver licence or IDs
- Residential address
- Company director and shareholder information

3.2 Business Information

- Legal company name
- Company registration number
- Ownership and shareholding structure

- Business address
- Contact information
- Nature of business and business activity
- Source of funds documentation
- Bank statements (if required)

3.3 Contact Information

- Email address
- Phone number
- Telegram username
- Business communication details

3.4 Financial & Transaction Information

Collected through the Licensed Issuer, Visa network, banks, or payment processors:

- Card balance
- Card transactions
- Merchant category codes
- FX conversion details
- Top-up amounts
- Bank transfer information
- Transaction authorisations and declines

- Chargeback data
- Fraud risk flags
- Compliance review details

3.5 Technical Information

- Device information
- IP address
- Browser information
- Access timestamps
- Usage logs
- Communication metadata

3.6 Information Provided Voluntarily

- Customer support inquiries
- Telegram messages
- Forms or documents uploaded
- Instructions for top-ups or card management

4. HOW WE COLLECT INFORMATION

We collect information through:

- Direct submissions during onboarding
- KYC documents you provide
- Telegram communications
- Top-up and payment instructions
- Transaction data supplied by the Licensed Issuer
- Visa network processing and logs
- Banks, payment processors, and third-party providers
- Public Business Registers (e.g., NZBN, Companies Office)
- AML/CFT compliance checks

5. PURPOSES OF COLLECTION

We collect and process personal information for the following reasons:

5.1 Providing Services

- Account creation
- Card issuance through the Licensed Issuer
- Top-up processing

- Transaction enablement
- Support and customer service

5.2 AML/CFT Compliance (New Zealand Law)

We are legally required to collect and verify identity and business information for:

- Anti-Money Laundering and Countering Financing of Terrorism Act 2009
- Sanctions screening
- Transaction monitoring
- Suspicious activity investigations

We cannot provide services without this information.

5.3 Fraud, Security & Risk Management

- Screening for high-risk behaviour
- Preventing unauthorised card usage
- Detecting suspicious activity
- Responding to chargebacks and disputes

5.4 Operational Requirements

- Sending transaction reports
- Reviewing top-up confirmations
- Handling customer inquiries

- Managing multi-card accounts (employees/authorised users)

5.5 Legal and Regulatory Obligations

- Responding to law enforcement
- Complying with Visa rules
- Issuer compliance obligations
- Responding to government requests

6. SHARING OF INFORMATION

We may share information with:

6.1 Licensed Issuer

For purposes of:

- Card issuance
- Authorisation and settlement
- Transaction monitoring
- Fraud screening
- Compliance reviews
- Chargeback handling

We do *not* control the Licensed Issuer's data processing; they act as an independent data controller.

6.2 Visa, Banks & Payment Networks

Information is shared automatically when:

- Transactions are made
- Cards are used overseas
- Chargebacks occur
- FX conversions take place

These networks may process data globally.

6.3 Third-Party Service Providers

Including:

- Compliance/KYC service providers
- Blockchain analytics tools
- Cloud hosting providers
- Payment processors
- Fraud detection vendors
- Communication platforms (e.g., Telegram)

6.4 Government & Regulatory Authorities

As required by law:

- Police & law enforcement
- FIU (Financial Intelligence Unit)

- DIA, FMA, or other NZ regulators
- Foreign authorities (via Visa or issuing banks)

6.5 Professional Advisors

Such as:

- Auditors
- Legal advisors
- Risk consultants

6.6 Related Entities

Valet Fintech Group Limited may share information across internal business units for operational or compliance purposes.

7. INTERNATIONAL DATA TRANSFERS

Because ValetCards uses an overseas **Licensed Issuer**, and because all Visa transactions involve international processing:

- Personal information **may be transferred, processed, or stored outside New Zealand**, including (but not limited to):
 - Singapore
 - Australia
 - United States
 - EU/UK

- Visa's global processing hubs
- Cloud hosting regions (AWS, Azure, Google Cloud)

We ensure reasonable safeguards are in place, but we cannot control the data handling policies of Visa, banks, or the Licensed Issuer.

8. DATA RETENTION

We retain your data for as long as necessary to fulfill:

- AML/CFT legal obligations (typically 5–7 years)
- Regulatory audit requirements
- Fraud detection
- Chargeback and dispute timeframes
- Internal record-keeping

After legal retention periods expire, data is securely deleted or anonymised.

9. SECURITY OF INFORMATION

We use reasonable technical and organisational measures, including:

- Access control
- Encrypted storage
- Secure transmission

- Internal staff confidentiality
- Third-party vendor security vetting

However:

No transmission or storage system is completely secure, and ValetCards does not guarantee absolute security of your data.

10. YOUR RIGHTS UNDER NEW ZEALAND PRIVACY LAW

You have the right to:

- request access to personal information we hold about you
- request correction of inaccurate information
- request clarification of how data is used
- complain to the NZ Privacy Commissioner

We will respond to requests in line with the Privacy Act 2020.

11. OPTIONAL DATA (MARKETING, ANALYTICS)

ValetCards does **not** currently conduct marketing campaigns or analytics profiling using personal information.

If we introduce such features, we will update this Policy.

12. USE OF TELEGRAM

The Client acknowledges:

- Telegram is a third-party platform outside NZ
- Messages may be stored internationally
- Telegram has its own privacy policy
- ValetCards cannot guarantee confidentiality of Telegram communications

Use of Telegram is at the Client's own risk.

13. COOKIES & WEBSITE TRACKING (IF APPLICABLE)

If ValetCards uses cookies or website analytics tools, they will be used only for:

- performance monitoring
- service improvement
- security purposes

No third-party advertising cookies are used.

14. CHILDREN / MINORS

ValetCards services are **not intended for individuals under 18**.

We do not knowingly collect personal information from minors.

15. CHANGES TO THIS PRIVACY POLICY

We may update this Policy from time to time.

Continued use of our services constitutes acceptance of updated terms.

We will notify Clients of material changes where appropriate.

16. CONTACT INFORMATION

For privacy-related inquiries:

Valet Fintech Group Limited

Email: assist@valetcards.com

Attention: Privacy Officer

If you are unsatisfied with our response, you may contact:

Office of the Privacy Commissioner (New Zealand)

<https://www.privacy.org.nz>