

Visa Europe Ltd -Breach of Personal Data

Melbourne, 16th August 2020 : iSignthis Ltd (the Company) has been advised by Visa Europe Ltd that personal data held on behalf of its European subsidiary, iSignthis eMoney Ltd, has been **manually transferred** to Visa Australia (AP) Pty Ltd.

No member of the iSignthis group has any contractual relationship with Visa Australia (AP) Pty Ltd. The licensing agreement for Australia was between Visa Worldwide Pte Ltd, being Visa's Asia Pacific regional head office in Singapore, and iSignthis Ltd.

The manual data transfer was not at the request of the data controller iSignthis eMoney Ltd, and was likely in breach of Visa's General Data Protection Regulation (GDPR) obligations, the Non-Disclosure Agreements and Membership Deed confidentiality agreements between Visa and iSignthis group companies. No consent was given for the data transfer by any iSignthis group company.

iSignthis eMoney Ltd has notified and/or lodged a complaint with;

- the United Kingdom Information Commissioner's Office reference IC-48691-X9P8
- the Office of the Australian Information Commissioner reference DBN20/00827
- the Cypriot Office of the Commissioner for Personal Data Protection reference "Visa_iSignthis"

The Company is also aware from communications originating from Visa Europe that Visa Australia has shared data with Australian Government agencies, including the Australian Securities and Investment Commission (ASIC). iSignthis is not aware of any legitimate purpose under European regulations for the sharing of the data, nor why Visa Australia would have the data in the first instance.

iSignthis is further also aware from communications originating from the ASX, that ASIC has shared some data and documents with the ASX Ltd under s127 of the ASIC Act.

Affected persons are being advised individually, and that they may lodge a complaint regarding Visa's mishandling of their personal data by visiting the below hyperlinks and including the relevant reference from above:

Australia

<https://www.oaic.gov.au/privacy/privacy-complaints/before-you-lodge-a-complaint-with-us/question-1/>

Cyprus

http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/page1i_en/page1i_en?opendocument

United Kingdom

<https://ico.org.uk/make-a-complaint/>

The Company apologises to its merchants, business owners, customers and cardholders who may have been affected by Visa's data breach, and for any inconvenience this data breach may cause.

The Company is not aware if Visa Europe Ltd has reported the data breach under its General Data Protection Regulation obligations, which includes disclosure of the number of persons affected, the reason for the breach, and the impact to persons affected by the breach.

Authorised by the Managing Director