



# Target Market Determination

For the Personal Account

provided by PayPal Australia Pty Ltd (**PPAU**) (ABN 93 111 195 389)

## 1 About this document

### When to use this target market determination

This target market determination (**TMD**) details a description of the likely objectives, financial situation and needs of consumers in the target market for the Personal Account issued and distributed by PPAU (**Personal Account**), a description of the product, including its key attributes and an explanation of why the product, including its key attributes, is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market.

This document is not intended to provide financial advice. Consumers must refer to the PPAU Combined Financial Services Guide and Product Disclosure Statement (**CFSGPDS**), (available [here](#)), which outlines the relevant terms and conditions for the product when making a decision about this product.

### Product to which this target market determination applies

This TMD applies to the Personal Account issued and distributed by PPAU, referred to in the CFSGPDS.

### Date from which this target market determination is effective

5 October 2021 (the **Effective Date**).

## 2 Class of consumers that fall within this target market

The information below summarises the overall class of consumers that fall within the target market for this product, based on the product key attributes and the likely objectives, financial situation and needs that the Personal Account has been designed to meet.

### Background

PPAU is an Authorised Deposit Taking Institution (**ADI**) that has the authority to provide Purchased Payment Facilities (**PPF**), offering online accounts that enable consumers to:

1. buy and sell goods and services online;
2. send and receive money for personal transactions that do not involve a purchase, i.e. the payment is not for goods or services (a **Personal Transaction**) online; and
3. send and receive money for commercial transactions online (**Business Account**).

There are three types of PPAU online accounts that can form the basis of a consumer's "digital wallet". These are the Personal Account, Premier Account and Business Account. This TMD relates only to the Personal Account.<sup>1</sup>

### Class of consumers

This Personal Account has been designed for use by individual Australian consumers over the age of 18 who meet PPAU's onboarding requirements and that require a low cost, safe and easy to use online account to process payments for domestic, personal or household purposes (the **Target Market**).

### Product description and key attributes

The Personal Account is a PPAU account restricted to individuals with an Australian address and at least 18 years of age.

The Personal Account is for personal, domestic, or household purposes only.

Deposits and withdrawals from a Personal Account can be made via a linked bank account or debit and credit cards via various payment channels or via the account holder's stored PayPal balance. Credit cards cannot be used to top up a Personal Account.

Consumers who hold a Personal Account (**Account holders**) are able to establish recurring payment arrangements and have the benefit of the following safeguards and protections:

- mistaken and unauthorised transactions liability protections as detailed in the Australian ePayments Code;
- PPAU's chargeback and refund policies<sup>2</sup>;
- PPAU's Buyer and Seller Protection Policy on eligible purchases (exclusions apply to some types of transactions including real estate, vehicles, gambling, financial products, purchases in excess of \$20,000)<sup>3</sup>; and
- PPAU's internal dispute resolution process as well as access to the Australian Financial Complaints Authority<sup>4</sup>.

Eligible account holders may also qualify to receive access to PPAU's micropayments pricing schedule for the sale of goods and services that typically average less than \$10.

### Needs and objectives

The Personal Account has been designed for consumers who want to send and receive money online and to make and accept online payments using other payment methods such as debit card, credit card or bank account, and who need to do so in a safe and cost-efficient manner.

### Excluded class of consumers

This product has not been designed for:

- Consumers conducting transactions for business purposes;
- Consumers who are wanting to use a traditional credit facility to make purchases (other than a credit card linked to their Personal Account);
- Investment purposes or for consumers looking to invest in term deposit or other high interest-bearing deposit accounts;
- Consumers that engage in activities that do not comply with PPAU's Acceptable Use Policy (See link [here](#)).

### Financial situation

This product has been designed for individuals who are able to pay the transaction amount and any associated transaction fees or charges.<sup>5</sup>

### Consistency between target market and product

The Personal Account is designed to be consistent with the likely objectives, financial situation and needs of the class of consumers in the Target Market. This is based on an analysis of the key terms, features and attributes of the Personal Account and a finding that these are consistent with the identified class of consumers. As the Personal Account has been designed for individual Australian consumers, only Australian residents aged over 18 are able to apply. Similarly, as the Personal Account has been designed for consumers who want a safe payment method, certain safeguards and protections are available.

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1. PPAU's Premier Account is a legacy product and can no longer be opened (since 27 October 2017). For the TMD in relation to the Business Account, please visit [here](#).

2. For further information on PPAU's chargeback and refund policies, visit PPAU's User Agreement [here](#).

3. For further information on PPAU's Buyer and Seller Protection Policy, visit PPAU's User Agreement [here](#).

4. For further information on PayPal's complaints handling process, visit PayPal's User Agreement [here](#).

5. See clause 18 of PPAU's Combined Financial Services Guide and Product Disclosure Statement for a full list of fees [here](#).

### 3 How this product is to be distributed

The Personal Account is distributed by PPAU via its online or mobile applications. In order to open a Personal Account, an online application form must be completed and verification must be undertaken of the consumer's information including name, date of birth and address. This assists PPAU in ensuring that the consumer is within the Target Market.

The account opening process is limited to PPAU's own proprietary online channels.

PPAU provides online merchants that offer PayPal as a payment option the ability to enable their customers to open a Personal Account via an embedded hyperlink on their website/platform/app. This process is undertaken as a referral, with merchants not arranging for the application or acquisition of the product or providing product advice to their customers.

#### **Distribution channels**

The Personal Account forming the basis of a "digital wallet" is distributed to consumers through PPAU's website.

#### **Distribution conditions**

This product is to be distributed in the following manner:

- Advertising is targeted to reach Australian adults and placed at times and places (virtual and real) where consumers are likely to be receptive to the Personal Account. Reasonable steps are taken to limit advertising at places or times that target minors, or business consumers.
- Other than its related bodies corporate, PPAU does not use third party agents or distributors to sign up or contact consumers on PPAU's behalf in respect of potential Personal Account holders.
- Ongoing monitoring by PPAU of the Personal Account to enable PPAU to understand whether the product continues to meet the needs, objectives and financial situation of the target market in accordance with the Personal Account key attributes.

#### **Adequacy of distribution conditions and restrictions**

PPAU has determined that these distribution conditions and restrictions will make it likely that consumers who open the Personal Account are in the class of consumers for which the product has been designed. PPAU considers that the distribution conditions and restrictions are appropriate and will assist distribution in being directed towards the Target Market for whom the product has been designed.

#### 4 Reviewing this target market determination

PPAU has implemented the following monitoring program for Personal Accounts, which is designed to trigger a review of this TMD:

<b>Initial review</b>	One (1) year from the Effective Date.
<b>Periodic reviews</b>	At least every year from the Initial Review.
<b>Review triggers</b>	<p>Any event or circumstances arise that would reasonably suggest the TMD is no longer appropriate. This may include (but is not limited to):</p> <ul style="list-style-type: none"> <li>• a material change to the design or distribution of the product, including related documentation;</li> <li>• a significant dealing of the product to consumers outside the Target Market occurs;</li> <li>• Distribution conditions found to be inadequate;</li> <li>• external events such as material adverse media coverage or regulatory attention; and</li> <li>• a significant increase in the number of internal complaints or complaints made to the Australian Financial Complaints Authority in relation to a consumer's acquisition or use of the product.</li> </ul>

Where a review trigger has occurred, this target market determination will be reviewed within 10 business days of PPAU's awareness of that trigger.

#### 5 Reviewing this target market determination

PPAU, as the issuer and distributor of the Personal Account, will collect the following information in relation to this TMD.

<b>Complaints</b>	We will collect information on all complaints in relation to this TMD on a monthly basis. This will include written details on the number and substance of complaints and general feedback relating to the product and its performance.
<b>Sales data</b>	We will collect information on relevant Personal Account applications, account cancellations and consumer data in relation to this TMD on a quarterly basis.
<b>Significant Dealing</b>	We will collect the date or date range of significant dealings and the description of the significant dealing as soon as practicable, and in any case, within 10 business days after becoming aware of the significant dealing.