

# TARGET MARKET DETERMINATION

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## ***Target Market Determination***

This document is a Target Market Determination (“TMD”) for the purposes of section 994B of the Corporations Act 2001 (Cth).

This TMD is made by Cuscal Limited ABN 95 087 822 455 Australian Financial Services Licence 244116 (the “Issuer”), the issuer of the product covered by this TMD (the “Product”).

The purpose of this TMD is to provide consumers information about the Product’s key attributes, the target market for the Product, and the distribution and monitoring arrangements between the issuer and the distributor, Next Payments Pty Ltd ABN 59 160 985 106 Australian Financial Services Licence 474743.

This TMD was made or last updated on 1 October 2021.

### ***1. Product***

#### **Name of the Product:**

Pittwater Rewards

#### **Venue in which the Product is offered:**

Pittwater RSL Club Ltd

#### **Type of the Product:**

eftpos branded reloadable Prepaid Card (“Prepaid Card”)

#### **Features of the Product:**

The key attributes of the Prepaid Card are that:

- It is designed for domestic use only for face-to-face purchases at merchant points of sale.
- It is reloadable which means a member can add extra funds to it, until the expiry of the Prepaid Card, by either Direct Credit or by the conversion of any reward points that a member has earned with the venue named above (the “Venue”) in accordance with the Loyalty Scheme. The Loyalty Scheme is to earn points to convert into a dollar value, which can be redeemed for rewards including goods and services.
- It can be used to buy goods and services from merchants in Australia who accept eftpos cards. There are no daily or other periodic limits to the number of times a member may use the Prepaid Card if they have sufficient Value available to cover their purchases and the associated fees with using the Prepaid Card.
- It cannot be used for e-commerce transactions or to withdraw cash from ATMs.
- It has a maximum available balance of \$4,999.

### ***2. Target Market***

The retail clients who comprise the target market for the Product are:

- Members of the Venue wishing to convert in-venue loyalty rewards points into Australian dollars loaded onto a reloadable Prepaid Card.

The likely objectives, financial situation and needs of consumers in the target market for the Product are as follows:

- **Objectives:** To obtain a Prepaid Card product for spending funds of the member which have been earned at the Venue through the Loyalty Scheme.
- **Financial situation:** Able to earn reward points under the Loyalty Scheme and with sufficient available reward points or other funds to load on the Prepaid Card.
- **Needs:** A Prepaid Card product which can be used to spend loyalty points earned at the Venue.

The Product is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market for the following reasons:

- The Prepaid Card is a reloadable prepaid eftpos card for a member to store their converted rewards and promotional wins earned at the Venue, as well as their own funds all in one convenient place to spend anywhere in Australia that accepts eftpos.

### 3. Retail Product Distribution Conduct

The conditions and restrictions on retail distribution of the Product (other than any imposed by the Corporations Act) are that the Prepaid Card should only be distributed under the following circumstances:

- The recipient is a member of the Venue and is over 18 years of age
- The recipient is identified by the Venue
- The Prepaid Card is provided directly to the member on issuance of the Product
- The recipient is provided with a copy of the Product Disclosure Statement and Financial Services Guide at the time of issuance.

The distribution channels and conditions that define the eligibility of a Venue member to receive the Prepaid Card ensure that the recipient of the Prepaid Card falls within the target market, but to confirm:

- the Venue and Distributor must not provide information to consumers about the Product that is inconsistent with the information in the Product Disclosure Statement for the Product
- the Venue and Distributor must not give financial product advice about the Product other than general advice about the Product contained in marketing materials
- the Venue and Distributor must not do anything on the Issuer's behalf other than marketing, arranging for the issue of, and providing customer services for the Product.

### 4. When the TMD May No Longer be Appropriate

The events or circumstances that would reasonably suggest that the TMD is no longer appropriate, and which would trigger a review of this TMD are:

- Material changes to the design or distribution of the Prepaid Cards, including related documentation
- Occurrence of a significant dealing, such as dealing in, or the distribution of, the Product outside the parameters of the TMD
- Distribution conditions found to be inadequate
- Change in legal or regulatory requirements
- External events such as adverse media coverage or regulatory attention; and
- Significant changes in metrics, including, but not limited to oral and written complaints in any 3-month period.

### 5. TMD Review Period

We will review this TMD in accordance with the below:

<b>Initial review</b>	Within the first 6 months of the effective date.
<b>Periodic Review</b>	At least every 12 months from initial review, or as required.

### 6. Reporting and Monitoring this TMD

The table below sets out the kinds of information needed for us to identify promptly whether a review trigger for the TMD has occurred, the distributors of the Product who should provide those kinds of information, and the reporting periods for when that information should be provided.

<b>Complaints</b>	Distributors will report complaints in relation to the product(s) covered by this TMD on a monthly basis for the following: <ul style="list-style-type: none"> <li>• Unresolved complaints greater than 5 days</li> <li>• Complaints made to the Australian Financial Complaints Authority.</li> </ul> These reports will include written details of the complaints.
<b>Significant Dealings</b>	Distributors will report if they become aware of a significant dealing in relation to this TMD within 10 business days.
<b>Product Performance</b>	Distributors will report product metrics on the product(s) covered by this TMD on a monthly basis for the following: <ul style="list-style-type: none"> <li>• Card volumes on issue</li> <li>• New cards activated</li> <li>• Transaction activity</li> <li>• Fraud and chargebacks</li> <li>• Lost or stolen cards.</li> </ul>



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Pittwater RSL Club Ltd ABN 31 001 052 802 acts as an authorised representative of Next Payments Pty Ltd ABN 59 160 985 106, AFSL 474743. Next Payments Pty Ltd is the distributor of the product and manages the prepaid product on behalf of Cuscal Ltd ABN 95 087 822 455, AFSL 244116. Cuscal Ltd is the issuer of the product. Any provided advice is general and does not take into account your objectives, financial circumstances or needs. Read the Product Disclosure Statement and Target Market Determination before making a decision and consider whether the product is right for you. Please ensure that you read and understand the Pittwater RSL Club Ltd membership and rewards terms and conditions.