



Target Market Determination

1. Target Market Determination - Spriggy Parent Wallet and Visa Prepaid Card

The Spriggy Parent Wallet and Visa Prepaid Card (**Prepaid Cards**) are financial products for the purposes of the design and distribution obligations set out in Part 7.8A of the Corporations Act 2001 Cth).

The purpose of this Target Market Determination is to provide consumers information about the Parent Wallet and Prepaid Cards' key attributes, the target market for the Parent Wallet and Prepaid Card, and the distribution and monitoring arrangements between the issuer, Indue Limited ABN 97 087 822 464, AFSL 320204 (**Indue**) and the distributor, Rivva Pty Ltd trading as Spriggy ABN 86 603 542 918, AFSL 513762 (**Spriggy**), and any other approved distributors from time to time.

This document is not to be treated as a full summary of the product terms and conditions and is not intended to provide financial advice. Customers should refer to the Product Disclosure Statement for the Parent Wallet and Prepaid Cards available at www.spriggy.com.au/terms when deciding about these products.

Date from which this Target Market Determination is effective

6 December 2022

2. Target Market

The information below summarises the overall class of consumers that fall within the target market for the Parent Wallet and Prepaid Cards, based on the product's key attributes and the objectives, financial situation and needs that they have been designed to meet.

a. Class of consumers that fall within the target market

The Spriggy Prepaid Card and Parent Wallet are designed for Australian resident families with a wide range of income and spending habits who are looking for a digital solution to manage children's pocket money and enable children to access that money to make purchases in store and online. The target market for this product is parents/guardians and family members with a child between the ages of 6-18 years.

b. Description of the Prepaid Card and Parent Wallet and their key attributes

The Spriggy Parent Wallet and Prepaid Card allow parents/guardians to transfer money from their Parent Wallet to their children's Prepaid Cards that can be used by the child to make purchases online or in store. Parents and children can also set up savings goals that help them learn the important financial lessons of saving. Key attributes are:

- i. **Prepaid Card** - This is a reloadable Visa Prepaid Card that children use independently to spend with the oversight of their parent/guardian. Cards can be used anywhere Visa cards can be used. They also have age-appropriate merchant blocking. Prepaid Cards are only issued to children whose parent/guardian has acquired a linked Parent Wallet. The Prepaid Card is subject to an annual load limit of \$10,000. The maximum value that may be stored on a Prepaid Card at any one time is \$999.
- ii. **Parent Wallet** – Parents can load their Parent Wallet in real time via Visa or Mastercard debit cards. Loads can also be made using direct debit and may take 2-3 business days to credit to the Parent Wallet.
- iii. The Parent Wallet can be used only to load value onto a Prepaid Card. It cannot

be used to withdraw cash from ATMs or from eftpos, or to make purchases and payments online or in physical stores.

- iv. Additional adult parent or family member users can also be added to the family.
- v. Savings and Goals - This is a reserved section of the Parent Wallet where parents and children can transfer money for savings.
- vi. Jobs - This is a feature that allows families to manage jobs around the house together.
- vii. Pocket Money - This is a feature that allows parents to transfer money to their children on an automated schedule.
- viii. Contributions link that allows other family and friends to contribute to a child's Prepaid Card.
- ix. The parent/guardian has visibility of transactions made using the Prepaid Card.
- x. A parent/guardian and child may apply to enable an additional feature for the Cardholder to receive funds onto the Prepaid Card via an external pay-in feature using the BSB and account number associated with the Prepaid Card. Transfers that would take the balance over the \$999 Prepaid Card limit would be rejected in full. The parent/guardian or child can transfer funds to the Parent Wallet to reduce the Prepaid Card balance.
- xi. Funds in the Parent Wallet belong to the parent/guardian.
- xii. A parent/guardian may apply to enable an additional feature for the Cardholder to make payments from the Prepaid Card to another Cardholder's Spriggy Prepaid Card.
- xiii. A parent/guardian may apply to enable ATM cash withdrawals from the Prepaid Card. If enabled, the maximum ATM daily cash withdrawal limit is \$250.
- xiv. A parent/guardian may apply to increase the Parent Wallet Limit to \$4,999.
- xv. All funds are held by Indue Limited, an authorised deposit-taking institution.
- xvi. An annual Spriggy membership fee is charged by Spriggy, and Spriggy may charge other fees or charges including a payment processing surcharge, see the Spriggy Terms and Conditions for details. Fees and charges charged by Indue also apply, see the Product Disclosure Statement for details. The PDS and terms and conditions are available at www.spriggy.com.au/terms.

c. Excluded class of consumers

The Spriggy Parent Wallet is not suitable for:

- i. individuals below the age of 18;
- ii. individuals who do not have access to a smart phone in order to download the Spriggy App and make transactions through the Spriggy App;
- iii. individuals who need to make online or in-store purchases or cash withdrawals from ATMs or eftpos;

- iv. individuals who wish to load more than \$240 in a single load, \$500 in any 24 hour period or \$10,000 in any 12 month period onto their Parent Wallet;
- v. individuals who require a maximum value limit at any time of more than \$999 (or \$4,999, if they have successfully applied for the increased value limit) for their Parent Wallet;
- vi. individuals who require a maximum load limit of more than \$999 or annual load limit of more than \$10,000 for their Parent Wallet.

The Visa Prepaid Card is not suitable for:

- i. children below the age of 6;
- i. children who do not have a parent/guardian with a linked Spriggy Parent Wallet;
- i. adults over the age of 18, unless Indue has agreed that special circumstances apply in accordance with the Product Terms and Conditions which are available at www.spriggy.com.au/terms;
- i. children who require a balance of more than \$999 on their Prepaid Card at any time;
- i. children who require an annual load limit of more than \$10,000 for their Prepaid Card.

d. Consistency between target market and Likely objectives, financial situation and needs

The Parent Wallet and Prepaid Cards are likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as they enable parents/guardians and other adult family members to have oversight over, and help them manage, their kids' money in a digital age and teach children practical money skills.

Parents can decide how much money to load onto the child's Prepaid Card from the Parent Wallet, while providing children access to the Prepaid Card through which they can make purchases instore and online.

3. Distribution Conditions and Restrictions

a. Distribution channels

The Parent Wallets and Prepaid Cards are distributed in the following ways:

- i. online through the Spriggy website at www.spriggy.com.au;
- ii. online through the Spriggy mobile application;
- iii. online through other approved distributors.

The Parent Wallet and Prepaid Cards will also be promoted in television, radio, internet (including social media), billboards and physical banners, periodicals, brochures and other marketing material available to the general public.

The issue of the product is subject to the distribution conditions and restrictions which will ensure that the product is only issued to persons for whom it will be appropriate.

b. Distribution conditions and restrictions

The Prepaid Cards should only be distributed under the following circumstances:

- iv. Parent Wallet - to individuals over the age of 18 who have applied for the Parent Wallet and have provided the required information to register for Spriggy and

- passed any required identity verification and fraud checks (**Parent**).
- v. Spriggy Prepaid Card – to children between the age of 6-18 who a Parent has applied for the Prepaid Card to be issued to (unless Indue has agreed to a special exemption in accordance with the Product Terms and Conditions which are available at www.spriggy.com.au/terms).

Our distribution conditions also include:

- i. Production and distribution of materials that explain and document the features of the product that are designed for consumers in the target market.
- ii. Controls on marketing to those outside the target market.

c. Adequacy of distribution conditions and restrictions

The targeted advertising combined with the need for the Parent to successfully pass the identification and verification checks will make it likely that consumers who purchase the product are in the class of consumers for which it has been designed.

4. Reviewing this Target Market Determination

We will review this Target Market Determination in accordance with the below:

Initial review	Within 6 months of the effective date.
Periodic reviews	At least every year from the initial review.
Review triggers or events	<p>Any event or circumstances arise that would suggest the Target Market Determination is no longer appropriate. This may include (but not limited to):</p> <ul style="list-style-type: none"> • a material change to the design or distribution of the Prepaid Cards, including related documentation; • occurrence of a significant dealing; • 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 an increase in complaints relating to the appropriateness of the product for the target audience.

Where a review trigger has occurred, this target market determination will be reviewed within 10 business days.

5. Reporting and monitoring this Target Market Determination

We will collect the following information from our distributors in relation to this Target Market Determination:

Complaints	Distributors will report all complaints in relation to the product(s) covered by this Target Market Determination on a monthly basis. This will include written details of the complaints.
Significant dealings	Distributors will report if they become aware of a significant dealing in relation to this Target Market Determination or the occurrence of a review trigger within 10 business days.