

# Target Market Determination

## 1. Target Market Determination - eftpos Prepaid Card

The eftpos Prepaid Card (Prepaid Card) is a financial product 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 Prepaid Cards' key attributes, the target market for the Prepaid Card, and the distribution and monitoring arrangements between the issuer, Gobsmacked Loyalty Pty Ltd ("GSL") and the distributor, Echuca-Moama RSL and Citizens Club Limited ("Venue").

This document is not to be treated as a full summary of the product's terms and conditions and is not intended to provide financial advice. You should refer to the Product Disclosure Statement for the Prepaid Card available at [www.moamarsl.com.au](http://www.moamarsl.com.au) when making a decision about this product.

Date from which this Target Market Determination is effective:

5 October 2021

## 2. Target Market

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

### (a) Class of consumers that fall within the target market

The Prepaid Card is for members of the Venue wishing to convert in-venue loyalty rewards points into Australian dollars loaded onto a reloadable prepaid card.

### (b) Description of the Prepaid Card and its key attributes

The Prepaid Card is a reloadable eftpos card.

The key attributes of the Prepaid Card are that:

- 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 in accordance with the Loyalty Scheme into a dollar value
- It can be used to buy goods and services from merchants in Australia who accept eftpos cards, there is no daily or other periodic limit 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 associated with using the Prepaid Card.

### (c) Consistency between target market and Likely objectives, financial situation and needs

The Prepaid Card is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as:

- The Prepaid Card is integral to the Cardholder being able to fully utilise the Venue's loyalty program that has been designed to reward its members.
- The Prepaid Card allows the Cardholder (as a member of the Venue) to store their converted Reward 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.

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## 3. Distribution Conditions and Restrictions

### (a) Distribution channels

The Prepaid Card is designed to be distributed to consumers through the Venue's registered principal place of business.

### (b) Distribution conditions and restrictions

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; and
- The recipient is provided with a copy of the PDS and FSG.

### (c) Adequacy of distribution conditions and restrictions

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.

## 4. Reviewing this Target Market Determination

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

<b>Initial review</b>	Within the first 6 months of the effective date.
<b>Periodic reviews</b>	At least every 12 months from the initial review.
<b>Review triggers or events</b>	Any event or circumstances arise that would suggest the Target Market Determination is no longer appropriate. This may include (but not limited): <ul style="list-style-type: none"><li>• a material change to the design or distribution of the Prepaid Cards, including related documentation;</li><li>• occurrence of a significant dealing;</li><li>• distribution conditions found to be inadequate;</li><li>• change in legal or regulatory requirements;</li><li>• external events such as adverse media coverage or regulatory attention; and</li><li>• significant changes in metrics, including, but not limited to oral and written complaints in any 3-month period.</li></ul>

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

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## 5. Reporting and monitoring this Target Market Determination

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

<b>Complaints</b>	Distributors will report all complaints in relation to the product(s) covered by this Target Market Determination on a quarterly basis. This 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 Target Market Determination within 10 business days.
<b>Lost or stolen Prepaid Cards</b>	Distributors will report on a quarterly basis details of any lost or stolen cards.