

Privacy Policy

Forex Capital Trading Pty Ltd (ABN 69 119 086 270)

This Privacy Policy applies to Forex Capital Trading Pty Ltd] ("ForexCT", "we", "us", "our") in relation to our operations and explains how we handle personal information and comply with the requirements of applicable privacy laws, including the Australian Privacy Principles ("Privacy Laws"). If you have further questions relating to this Privacy Policy please contact us using the contact information below.

1. Collection of personal information

1.1 The types of personal information ForexCT collects from you may include:

- (a) contact details (i.e. name, mailing or street address, email address, phone number, fax number);
- (b) information to verify your identity (i.e. date of birth, drivers licence number, passport number, birth certificate number, Medicare number);
- (c) information necessary to open a trading account with us (i.e. language preference, bank account details, credit card number, information about anyone acting as your agent, financial advisor or broker and the scope of their authority, information about directors if the customer is a company);
- (d) information about whether you are a suitable person to trade (i.e. employment status, industry you work in, annual income, source of funds, whether you have traded before, whether you have attended any seminars about trading);
- (e) statistical information regarding the use of our website including users' IP address and the date and time of visits; and
- (f) information required as part of the recruitment process when you apply for employment with us.

1.2 We collect personal information through various means including: when you make enquiries with us, register or log into our application, when you use our website, employment applications, third party service providers and responses to surveys or research conducted by us.

1.3 If you do not provide us with the information we request, we may not be able to fulfill the applicable purpose of collection, such as to permit you to use our application or website or to assess your application for employment.

1.4 Where practicable, we will collect personal information directly from you. If we receive information about you from someone else, we will take reasonable steps to ensure you are aware that we have collected personal information about you and the circumstances of the collection.

2. Storage of personal information

2.1 We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

- 2.2 We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure and require our external service providers to do the same.
- 2.3 These processes and systems include:
- a. the use of identity and access management technologies to control access to systems on which information is processed and stored;
 - b. requiring all employees to comply with internal information security policies and keep information secure;
 - c. requiring all employees to complete training about information security; and
 - d. monitoring and regularly reviewing our practise against our own policies and against industry best practice.
- 2.4 We will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the Privacy Laws.

3. Use and disclosure of personal information

Our main purposes for collecting, holding, using and disclosing personal information are to: provide services to you including permitting you to trade using our platform; to comply with our 'know your customer' due diligence and any other requirements under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (AML Act); respond to enquiries; assess employment applications; undertake research and surveys; analyse statistical information and let you know about our other services and services of ForexCT Group.

- 3.1 We generally explain before, at the time we collect personal information, or as soon as practicable thereafter the purpose for which we collect your personal information, who we will disclose it to and other matters required by law. We will only use or disclose personal information for a purpose other than for which it was collected or a related purpose if you have consented to such different use or disclosure or such use or disclosure is otherwise allowed by the Privacy Laws.
- 3.2 In carrying out our business, it may be necessary to share information about you with and between our related bodies corporate and organisation that provide services to us (e.g. our outsource providers). We may need to disclose information to financial institutions in order to make or amend your investment. We may also disclose information with your consent to a person that you have told us is acting as your agent, financial advisor or broker. In addition, we may disclose your information to the Australian Transaction Reports and Analysis Centre (AUSTRAC) to comply with our obligations under the AML Act.

4. Disclosure of information outside the jurisdiction of collection

We use overseas service providers and allow our other companies within the ForexCT Group to access your information from overseas. However, we impose strict controls to ensure that we retain effective control over the information and only allow the overseas entities to use the information for the limited purpose of providing services to us.



5. Direct marketing

We may, from time to time, send you marketing materials about our products or those of the ForexCT Group. If you are receiving promotional information from us and do not wish to receive this information any longer, please contact us using our contact details below asking to be removed from our mailing lists, or use the unsubscribe facilities included in our marketing communications.

6. Our website privacy practices

We sometimes use cookie technology on our websites to provide information and services to website visitors. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes and are a necessary part of facilitating online transactions. Most web browsers are set to accept cookies. Cookies are useful to determine overall traffic patterns through our website. If you do not wish to receive any cookies you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of the services on the website.

7. Telephone Conversations

We may monitor and record telephone conversations with you for training and security Purposes *and to maintain a record of your instructions to us*. Such recordings may be used in evidence in any dispute arising in connection with any transactions under this agreement. In the event that our telephone conversations with you are recorded, those records are the property of ForexCT and will not be provided to you even upon request.

8. Links to other websites

Our websites may contain links to third party websites. These linked sites are not under our control and we are not responsible for the content of those sites nor are those sites subject to our Privacy Policy. Before disclosing your personal information on any other website we recommend that you examine the terms and conditions and Privacy Policy of the relevant site. ForexCT is not responsible for any practices on linked websites that might breach your privacy.

9. Accessing and correcting the information we keep about you

- 9.1 If at any time you want to know exactly what personal information we hold about you, you are welcome to request access to your record by contacting us using our contact details below. Our file of your information will usually be made available to you within 30 days unless we are permitted to refuse you access under law.
- 9.2 If at any time you wish to change personal information that we hold about you because it is inaccurate or out of date, please contact us using our contact details below and we will amend your record. If you wish to have your personal information deleted, please let us know in the same manner as referred to above and we will take all reasonable steps to delete it unless we need to keep it for legal reasons.

10. How to make a complaint

- 10.1 If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, please contact us using the contact information below.



10.1 We will investigate your complaint and will use reasonable endeavours to respond to you in writing within 30 days of receiving the complaint. If we fail to respond to your complaint within 30 days of receiving it in writing or if you are dissatisfied with the response that you receive from us, you may have the right to make a complaint to the Office of the Information Commissioner.

11. Contacting Us

If you have any questions, comments or concerns, please contact us at:

Contact person: Compliance Officer

Email: info@forexct.com.au

Address: Level 18, 636 St Kilda Road, Melbourne, Victoria 3004, Australia

12. Future changes

We reserve the right to change this Privacy Policy at any time and notify you by posting an updated version of the Privacy Policy on our website. If at any point we decide to use personal information in a manner materially different from that stated at the time it was collected we will notify you by email or via a prominent notice on our website, and where necessary we will seek your prior consent.