

Saxo Capital Markets (Australia) Pty Ltd ABN 32 110 128 286 "SCM" is committed to protecting the privacy of our clients. We are bound by the National Privacy Principles and the *Privacy Act 1988* (Cth) and will meet its requirements in our dealings with you.

This Privacy Policy sets out how we manage personal information, including, generally, the kinds of personal information we may collect, the purposes for which we may collect it and how we hold, use and disclose personal information.

PURPOSES OF COLLECTION

We will collect and hold your personal information for the purposes of:

- providing you with any product or service provided by SCM or a related company, including assessing your application, administering any facility you have with us, executing instructions and complying with our legislative and regulatory obligations relating to the product or service;
- meeting our ongoing obligations to you in providing you with the product or service;
- meeting our external obligations, such as with regard to third party systems and relationships, in order to provide you with the product or service;
- meeting our obligations under applicable laws, such as customer identification requirements under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and compliance requirements under the *Corporations Act 2001* (Cth) and other legislation governing the provision of financial services;
- protecting against fraud; and
- to contact you with information about products or services that you might be interested in,

as well for other purposes described in the section below headed "We may disclose your information to other organisations".

Information which we may collect includes, for example, your name, date of birth, residential and business addresses, licence details, email addresses, telephone numbers, financial details, tax file number and any other information we consider necessary to undertake our activities.

Where reasonable and practicable, we will endeavour to collect your personal information from you (for example, through application forms). In some circumstances, however, we may also collect personal information about you from third parties, such as your financial adviser, accountant or employer or organisations of the kinds listed in the section below headed "We may disclose your information to other organisations".

CONSEQUENCE OF FAILING TO PROVIDE INFORMATION

If you do not provide us with any requested personal information this may mean that we are unable to provide you with a product or service.

WE MAY DISCLOSE YOUR INFORMATION TO OTHER ORGANISATIONS

We may disclose your personal information to our related bodies corporate in order to meet our obligations to you and for other purposes as described above.

We may also disclose your information for such purposes to other organisations. Organisations to whom your personal information may be disclosed include:

- external service providers involved in our provision of products and services to you, such as mailing houses, call centres, debt collector agencies, professional advisers (such as our lawyers and compliance advisers), identity verification services;
- to any potential purchaser of the whole or part of our business (or any other relevant party advisers such as that), on a confidential basis;
- your agents, advisers or lawyers, such as where you have obtained a service from us through them or are otherwise dealing with us in any way through them;
- parties involved in markets and systems related to the products and services we provide to you, such as market operators and participants, counterparties, intermediaries and custodians;
- entities involved in any corporate reorganisation affecting us;
- entities assisting us to maintain and improve our systems, products and services;
- credit reporting agencies;

- entities to whom we are required or authorised by law to disclose your personal information, such as government and regulatory bodies.

Because our operations involve activities both within and outside of Australia, some of these disclosures may be to entities that are overseas.

PROTECTING YOUR PERSONAL INFORMATION

The security of your personal information is important to us and so we take reasonable steps to protect it from misuse, loss and unauthorised access or disclosure. Such steps include:

- written confidentiality and security policies that apply to all our employees;
- security measures for access to our systems and premises and for document and file storage;
- by reasonably limiting internal access to clients' personal information to staff who require it to fulfil our obligations to clients and related matters; and
- firewall and data encryption measures protecting our websites.

You can sometimes access other organisations' websites through links on our websites. Please note that we are not responsible for the privacy standards and processes of those organisations and external websites.

WHEN YOU CAN DEAL WITH US ANONYMOUSLY

Under the Privacy Act you have the right to deal with us anonymously where this is lawful and practicable. For example, this can sometimes be the case when you are enquiring about our products and services.

We collect or store user information on our website by using "cookies" (small files placed on your computer by some websites for various reasons for marketing purposes).

SENSITIVE INFORMATION

While we usually do not need to collect sensitive information about you (such as health information, information about racial or ethnic origin, criminal record information), if we require such information we will generally only collect it with your consent. This is subject to exceptions, such as where the collection is required by law or necessary to establish or defend a legal claim.

ACCESSING YOUR PERSONAL INFORMATION AND KEEPING IT UP-TO-DATE

You have the right to request access to your personal information which we hold. Your access rights are subject to some exceptions allowed by law. We will respond to your request in accordance with the Privacy Act and any other law which affects this obligation. A fee may be payable if you request a copy of information. If we deny your access request we will provide you with reasons for doing so.

We aim to keep the personal information we hold about you up-to-date. If you believe that information we hold about you is incorrect please let us know so we can correct this.

CONTACTING US WITH ANY PRIVACY QUERIES OR COMPLAINTS

If you would like to request access to or correction of your personal information, or if you have a privacy - related query or complaint, please contact us in any one of the following ways listed below.