

## VANTAGE FX PTY LTD

### Our Commitment

Vantage FX Pty Ltd ("Vantage FX", "we", "our", "us") is committed to providing you with the highest levels of client service. We recognise that your privacy is very important to you. The Privacy Act 1988 (Cth) and the "private sector amendments" contained in the Privacy Amendment (enhancing Privacy Protection) Act 2012 (Cth) sets out a number of Australian Privacy Principles (APPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner [www.oaic.gov.au](http://www.oaic.gov.au)

Vantage FX believes that this Privacy Policy discloses how the personal information you provide to us and our representatives, is collected, used, held, disclosed and disseminated.

Vantage FX is required to meet particular legislative and regulatory requirements which requires us to collect certain personal information from you for the purposes of:

- ◆ Providing you with the relevant product or service
- ◆ Managing and administering the product or service
- ◆ Protecting against fraud

We encourage you to check our website regularly for any updates to our Privacy Policy.

### Your Personal Information

We are subject to certain legislative and regulatory requirements which necessitate us to obtain personal information about you, including s945A of the Corporations Act. Detailed below is some of the information Vantage FX may hold on you:

- ◆ Name, address, telephone number(s)
- ◆ Date of birth
- ◆ Email address
- ◆ Occupation and job title
- ◆ Transaction details associated with your trading through us
- ◆ Additional information provided to us and recorded by telephone
- ◆ Information you provided to us on client agreement forms
- ◆ Nominated bank account details
- ◆ Statement of assets and liabilities
- ◆ Information regarding guarantees of company accounts
- ◆ Tax file number
- ◆ Employer

If you provide inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking.

### How We Collect Personal Information

Vantage FX collects personal information in a number of ways, including:

- ◆ directly from you, when you attend a face-to face interview;
- ◆ directly from you, when you provide information through a data collection form;
- ◆ directly from you, when you provide information by phone; and
- ◆ directly from you via an email or the internet.

### How We Use Your Personal Information

The information in this document details how we comply with the Privacy Act including:

- ◆ What is the purpose?
- ◆ Who is my information disclosed to?
- ◆ What law requires collection?
- ◆ What are the consequences?

Primarily, your personal information is used in order to:

- ◆ Meet particular legislative and regulatory requirements;
- ◆ To assist in providing services to you;
- ◆ To assist with any calls you make to us;
- ◆ To communicate relevant information to you;
- ◆ For our product development, marketing, planning, administration and credit control procedures..

From time to time, we may provide you with direct marketing material. This will include emails, articles and newsletters that may be of interest to you. If, at any time, you do not wish to receive this information any further, you may contact us with this request. We will endeavour to meet your request within 1 week. We maintain a Register for those individuals not wanting direct marketing material.

### When We Disclose Your Personal Information

In line with modern business practices common to many financial institutions and to meet your specific needs we may disclose your personal information to the organisations described below. The Corporations Act has provided the Australian Securities and Investments Commission with the authority to inspect certain personal information that is kept on our files about you. We collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

For the purposes set out above, we may disclose your personal information to organisations outside Vantage FX. The organisations to which we disclose information may include:

- ◆ other product providers in order to manage or administer your product or service;

- ◆ compliance consultants to ensure that our representatives are meeting our compliance standards;
- ◆ mailing houses;
- ◆ your professional advisers, including your solicitor or accountant as authorised by you;
- ◆ information technology service providers to maintain, review and develop our business systems, procedures and infrastructure including testing or upgrading our computer systems;
- ◆ government and regulatory authorities and other organisations, as required or authorised by law, for example, to government or regulatory bodies for the purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue.
- ◆ another authorised representative of Vantage FX if necessary;
- ◆ a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer or all or part of the assets of our business.
- ◆ where you have given your consent including your legal advisers;
- ◆ a new owner of our business that will require the transfer of your personal information.

In addition, our employees and the outsourcing companies/contractors are obliged to respect the confidentiality of any personal information held by Vantage FX.

Vantage FX takes its obligations to protect your information seriously, this includes when we operate throughout Australia and overseas, as part of our operations some uses and disclosures of your information may occur outside your State or Territory and/or outside of Australia. In some circumstances we may need to obtain your consent before this occurs.

Our ability to enforce the Australian Privacy Principles or any other contractual privacy obligation against overseas recipients and to take action in relation to any breach may be very limited and/or far less effective than it would be if such recipients were Australian based. As Australian Privacy Principles may not be enforceable against or apply to overseas regulation we understand that you may choose not to disclose your personal information to us. However, if you choose not to provide the information we require to fulfil your request for a specific product or services, we may not be able to provide you with the requested product or service.

In the event of that we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them.

### How We Store and Secure Your Personal Information

We keep your personal information in your client file. These files are accessible to authorised personnel only and are appropriately secured out of hours. Your personal information may also be held on our computer database. All computer-based information is protected through the use of access passwords. Data is backed up regularly and stored securely off site. Other measures taken are:

- ◆ Confidentiality requirements for our employees
- ◆ Security measures for systems access
- ◆ Providing a discreet environment for confidential discussions

Personal information will be treated as confidential information and sensitive information will be treated highly confidential. It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

### Ensure Your Personal Information Is Correct

Vantage FX takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- ◆ inform us of any errors in your personal information as soon as possible; and
- ◆ update us with any changes to your personal information as soon as possible.

### Access to Your Personal Information

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information. Access to the requested personal information may include:

- ◆ providing you with copies;
- ◆ providing you with the opportunity for inspection; or
- ◆ providing you with a summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Some exceptions exist where we will not provide you with access to your personal information if:

- ◆ providing access would pose a serious threat to the life or health of a person;
- ◆ providing access would have an unreasonable impact on the privacy of others;
- ◆ the request for access is frivolous or vexatious;
- ◆ the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- ◆ providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- ◆ providing access would be unlawful;
- ◆ denying access is required or authorised by or under law;
- ◆ providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

## Using Government Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

## Dealing with us anonymously

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

## Your sensitive information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

This is subject to some exceptions including:

- ◆ the collection is required by law; and
- ◆ when the information is necessary for the establishment, exercise or defence of a legal claim.

## Complaints Resolutions

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner.

## Our Website

Vantage FX website provides links to third party websites. The use of your information by these third party sites is not within the control of Vantage FX and we cannot accept responsibility for the conduct of these organisations. Other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy stands, policies and procedures.

You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database. We take care to ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data encryption.

If you do not wish to receive any further information from us, or you wish to update your registration details, please email your request to us. We will endeavour to meet your request within 5 working days.

We may use cookie technology as part of our websites statistical reporting. A cookie is a small piece of information sent by a website that

Version Date 3.0

Date Prepared: 12<sup>th</sup> March 2014

is saved on your hard disk by your computer's browser. It holds information a site may need to personalise your experience and to gather web site statistical data, such as which pages are visited, what is downloaded, the internet provider's domain name and country that our visitors come from and the addresses of sites visited immediately before, and after, coming to our site. However, none of this is associated with you as an individual. It is measured only in aggregate. The information in the cookies lets us trace your "click stream" activity (i.e., the paths taken by visitors to our site as they move from page to page.) Cookies do not capture your individual email address or any private information about you.

We also use standard web server log files to help us count visitors and evaluate our site's technical capacity. We use this information to find out how many people visit our site, help us arrange the pages in the most user-friendly way, keep the site browser-friendly, and to make our pages more useful to our visitors. We record information on site traffic but not information on individual visitors to our site, so no information about you in particular will be kept or used.

To browse without cookies, you can configure your browser to reject all cookies, or to notify you when a cookie is set. (Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.)

## Spam Act

Spam is a generic term used to describe electronic 'junk mail'- unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'.

'Electronic messaging' covers emails, instant messaging, SMS and other mobile phone messaging, but not cover normal voice-to-voice communication by telephone.

Vantage FX complies with the provisions of the Spam Act when sending commercial electronic messages.

Equally importantly, Vantage FX makes sure that our practices are in accordance with the Australian Privacy Principles in all activities where they deal with personal information. Personal information includes our clients contact details.

## 'Do Not Call' Register

Unless you call 1300 945 517 and ask us not to contact you about products or services and not to disclose your information to others for that purpose; by accessing our website [www.vantagefx.com](http://www.vantagefx.com) you consent to us contacting you by telephone while you hold any product or receive any services from us notwithstanding registration at any time of your telephone number on the 'do not call' register.

## Internal Procedure for dealing with communications

The three key steps Vantage FX follows:

- ◆ Consent – Only commercial electronic messages are sent with the addressee's consent – either express or inferred consent.

- ◆ Identify – Electronic messages will include clear and accurate information about the person and the company that is responsible for sending the commercial electronic message.
- ◆ Unsubscribe – We ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

### **Consented to such communications**

Commercial messages will only be sent to you when you have given consent. This may be express consent – a direct indication that it is okay to send the message, or messages of that nature or inferred consent based on our business or other relationship with you and your conduct.

### **Comply with the law regarding viral messages**

Vantage FX ensures that Commercial Communications that include a Forwarding Facility contain a clear recommendation that the Recipient should only forward the Commercial Communication to persons with whom they have a relationship, where that relationship means that person could be said to have Consented to receiving Commercial Communications.

### **Comply with the age sensitive content of commercial communication**

Where the content of a Commercial Communication seeks to promote or inspire interaction with a product, service or event that is age sensitive, the Vantage FX takes reasonable steps to ensure that such content is sent to Recipients who are legally entitled to use or participate in the product service or event.

### **Contact Details**

Privacy Officer  
Vantage FX Pty Ltd  
Suite 405, 68 York Street,  
Sydney NSW 2000  
Phone: 1300 945 517  
Fax: +61 2 9279 2652  
Email: [support@vantagefx.com](mailto:support@vantagefx.com)