

GO MARKETS
first choice for forex

PRIVACY POLICY

ISSUED NOVEMBER 2017

PRIVACY POLICY

1. Our Commitment to You

GO Markets Pty Ltd ("GO Markets", "we", "our" or "us") is committed to providing you with the highest levels of client service. We recognise that your privacy is very important to you and we respect the confidentiality of information and the privacy of individuals.

Your personal information will be treated strictly in accordance with the "Australian Privacy Principles" in the Privacy Act 1988 (Cth.) and the "Private Sector Amendments" contained in the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth.).

You can access further information on privacy in Australia by visiting the website of the Office of the Federal Privacy Commissioner at www.oaic.gov.au.

This Privacy Policy discloses how the personal information you provide to us and our representatives, is collected, used, held, disclosed and disseminated. We are committed to being open and transparent about how we use your personal information.

Our Privacy Policy is reviewed from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate. Any personal information we hold will be governed by the most current GO Markets Privacy Policy displayed on our website.

2. Why do we Collect Personal Information?

To enable us to meet our customer's needs effectively when providing financial services, we need to collect certain personal information.

GO Markets must meet legislative and regulatory requirements which require us to collect personal information from you for the purposes of:

- Providing you with the relevant product and service;
- Managing and administering the product and service;
- Mitigating against the risk of money laundering and terrorism financing.

3. How do we Collect Personal Information?

Because of the nature of the products and services we provide, government regulations and taxation laws, we are required to collect personal information about you which can include, but is not limited to, the below:

- Name, address and date of birth;
- Contact details;
- Employment details;
- Trading statements;
- Additional information provided to us and recorded via telephone;
- Information provided in Client Agreement forms;
- Nominated Bank Account details;
- Statement of income, assets and liabilities;

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- Information regarding guarantees for Company Accounts;
- Tax File Number; and
- Voluntary information you provide.

You are not required by law to provide us with any of the personal information requested, however, without the information required, GO Markets will not be able to provide you with any of the services you have applied for.

4. How do we Collect Personal Information?

GO Markets collects personal information in a number of ways, including:

- Directly from you, when you provide information in your application form submitted through the GO Markets website; ;
- Directly from you, when you provide information over the telephone; and
- Directly from you, via e-mail, live chat or the internet.

5. How do we Use Your Personal Information?

Primarily, your personal information is used in order to:

- Meet particular legislative and regulatory requirements;
- Assist in providing services to you;
- Assist with any calls you make to us;
- Communicate relevant information to you; and
- Assist in product development, marketing, planning, administration and credit control procedures.

From time to time, we may provide you with direct marketing material. This will include e-mails, articles and newsletters that may be of interest to you. We may also from time to time carry our CRM retargeting. CRM retargeting is a marketing technique which allows us to reach you with online display advertising by using your personal information (specifically, your email address).

If, at any time, you do not wish to receive this information or be subject to CRM retargeting, you can "unsubscribe" from marketing communications and contact us to request that you do not wish to be subject to CRM retargeting. We will endeavour to meet requests to not be subject to CRM retargeting within one (1) week.

We also maintain a "Register" for those individuals who do not want to receive direct marketing material. You can choose to be added to this register by selecting "unsubscribe" at any time. All of our email communications contain an "unsubscribe" option.

For any marketing you receive as a result of our use of cookies, please see section 14 below.

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6. Identity Verification Procedures

Personal information that you provide will be used for identity verification purposes in accordance with our legislative and regulatory obligations.

To enable us to verify your identity, we may disclose personal information such as your name, date of birth and address to a credit reporting agency (CRA) to obtain an assessment of whether that personal information matches information held by the CRA. The CRA may give us a report on that assessment and to do so may use personal information about you and other individuals in their files. Alternative means of verifying you are available on request. If we are unable to verify your identity using information held by the CRA, we will provide you with a notice to this effect and give you the opportunity to contact the CRA to update your information held by them or verify your identity using an alternative method acceptable to us.

7. When do we Disclose Your Personal Information and Who do we Disclose it To?

The personal information we hold is used for establishing and managing your account, reviewing your ongoing needs, enhancing customer service and products and giving you ongoing information or opportunities that we believe may be relevant to you. We may also use your personal information for business planning purposes including product development and internal research.

In addition, the Corporations Act has provided the Australian Securities and Investments Commission ("ASIC") with the authority to inspect certain personal information that is kept on our files about you. We also collect information about you for reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

This means that personal information may be disclosed to:

- Other associated companies and product providers in order to manage or administer your product or service;
- Service providers and specialist advisers who have been contracted to provide us with administrative, financial, taxation, insurance, compliance, research or other services;
- If you were introduced to GO Markets by a third party we may disclose information to them, including introducing brokers & affiliates;
- Credit reporting agencies;
- 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 and/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;
- An authorised representative of GO Markets 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 of all or part of our business assets;
- Anyone you have authorised us to disclose your personal information to; and
- A new owner of our business that will require the transfer of your personal information.

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In addition, our employees and any outsourced companies/contractors are obliged to respect the confidentiality of any personal information held by GO Markets.

GO Markets takes its obligations to protect your information seriously, this includes when we operate throughout Australia and overseas. 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.

We may take reasonable steps to require organisations, both within and outside of the GO Markets group of companies, who handle or obtain personal information as service providers to us, acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with either the **Australian Privacy Principles** or their local privacy regime and this policy.

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 need to fulfil your request for a specific product or service, 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.

8. Solicited Personal 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.

It is our policy that sensitive information will be used and disclosed only for the purposes for which it was provided, unless you agree otherwise or the use or disclosure of this information is allowed by law, or when the information is necessary for the establishment, exercise or defence of a legal claim.

9. How do we Store and Secure your Personal Information?

We hold personal information in a combination of secure computer storage facilities, paper-based files and other records. Irrespective of the format of the information, take steps to protect the personal information we hold from interference, misuse, loss, unauthorised access, modification or disclosure.

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 (and disciplinary procedures in place, including dismissal for privacy breaches);
- Security measures for system access; and
- Provision of a discreet environment for confidential discussions.

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Please note that personal information will be treated as confidential information and sensitive information will be treated as highly confidential.

It is a legislative requirement that we keep all personal information and records for a period of 7 years from the date you close your account with GO Markets. 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.

10. Ensure your Personal Information is Correct and Up-To-Date

GO Markets 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.

We can generally update your customer information over the telephone, by e-mail from your registered e-mail address or via the client portal. Please note however that you will be asked to verify your personal details for security purposes before an amendment can be made.

11. 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;

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- Denying access is required or authorised by or under law; and
- 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.

12. Solicited Personal Information

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.

13. 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.

Please be advised however, due to the nature of the services and products we provide, and regulatory requirements associated, we cannot offer an option allowing you to transact as a client of ours on an anonymous basis.

14. Our Website and Cookies

Please note that GO Markets' website provides links to third party websites. The use of your information by these third-party sites is not within the control of GO Markets 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 e-mail 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 if you wish to update your registration details, please select the "unsubscribe" button to manage your preferences.

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 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). Please note that cookies do not capture your individual e-mail address or any private information about you.

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If you wish to browse without cookies, you can configure your browser to reject all cookies, or to notify you when a cookie is set (note that each browser is different, so you will need to check the "help" menu of your browser to learn how to change your cookie preferences).

Furthermore, 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.

15. Spam Act

The *Spam Act 2003* prohibits the sending of unsolicited commercial electronic messages—known as spam—with an Australian link. A message has an Australian link if it originates or was commissioned in Australia, or originates overseas but was sent to an address accessed in Australia.

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

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

GO Markets complies with the provisions of the Spam Act when sending commercial electronic messages.

16. 'Do Not Call' Register

Unless you ask us not to contact you about our products or services and not to disclose your information to others for that purpose, by accessing our website and applying for a demo or live account, you consent to us contacting you via telephone while you hold any product or receive any services from us. This is notwithstanding registration at any time of your telephone number on the '**do not call**' register.

17. Internal Procedure for Dealing with Communications

The three key steps GO Markets follows:

1. **Consent** – Only commercial electronic messages are sent with the addressee's consent.
2. **Identify** – Electronic messages will include clear and accurate information about the person and the company that is responsible for sending the commercial electronic message.
3. **Unsubscribe** – We ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests instantly.

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18. Consent to Communications

Commercial messages will only be sent to you when you have given consent. Such consent is given at the time you open a demo or live account with us.

19. Complying with the Law Regarding Viral Messages

GO Markets 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.

20. Complying with the Age Sensitive Content of Commercial Communications

GO Markets 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.

21. Complaint Resolution

Please contact our Compliance Team if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be dealt with promptly. If you are not satisfied with the outcome of your complaint, you can telephone the Commonwealth Privacy Commissioner's hotline on 1300 363 992.

Please note that GO Markets record telephone conversations for regulatory, training and quality purposes. Such recordings, or transcripts from such recordings, may be used for training purposes and to assist in resolving any dispute between you and GO Markets.

22. Contact Details

Name: GO Markets Pty Ltd
Attention: Privacy Officer, GO Markets Compliance Team
Address: Level 22
600 Bourke Street
Melbourne
VIC 3000
Australia
Phone: +61 3 8566 7680
Fax: +61 3 9225 5067
E-mail: compliance@gomarkets.com
Website: www.gomarkets.com.au