



# Privacy Policy

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# OpenMarkets Privacy Policy

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This policy applies to information collected by OpenMarkets Australia Ltd and its related bodies corporate ("OpenMarkets" or "we"). It outlines how we collect and use personal information that we hold about you in accordance with the Privacy Act.

## Collection of personal information

We only collect personal information that is reasonably necessary for us to provide services. If you do not provide the information that we ask for, we may not be able to provide the products or services you have requested. We may collect information such as your name, address, phone number, email address, tax file number, bank account details, other information that may be required for identification purposes, information about your investments and transactions and other information related to the services we provide.

We will collect your personal information directly from you or from your financial adviser or stockbroker when you apply to open an account with OpenMarkets including through your financial adviser or stockbroker. We may also collect your personal information as we provide services to you or your financial adviser or stockbroker. By using OpenMarkets services you consent to OpenMarkets collecting your information from your financial adviser or stockbroker or other person or entity who provides services to you. We may also collect information directly from you, such as when you provide the information by phone, email or in an application form or when you deal with us as a key contact or employee of a client or counterparty of OpenMarkets.

## Use and disclosure of your personal information

OpenMarkets may use your personal information for the primary purpose of providing securities trading and settlement services to you, as well as for related purposes such as:

- to verify your identity or transactions which you may enter into with us;
- to administer and manage the provision of our products and services;
- to provide you with offers of other OpenMarkets products or services;
- to comply with laws and regulatory requirements including complying with any request made by a governmental authority or regulator, including in connection with legal proceedings or the prevention or detection of fraud and crime;
- to comply with OpenMarkets' risk management policies and procedures;
- conducting due diligence as part of a pre-employment screening or acceptance of your account with OpenMarkets; or
- another purpose related to the primary purpose.

For the purposes we have described, we may disclose your personal information:

- to our suppliers (including service and content providers), contract and service providers, professional advisers, dealers and agents;
- to government agencies or individuals responsible for the investigation and resolution of disputes or complaints covering your use of our services and facilities including for example ASIC, AUSTRAC or the OAIC;
- other parties involved in the administration of your investments including stock exchanges, product issuers, investment registries or mailing houses;
- anyone to whom our assets or business (or any part of it) is transferred (or offered to be transferred, subject to confidentiality provisions);
- other entities in the wider OpenMarkets group; or
- where you have otherwise consented or as otherwise required or authorised by law.

## Access and correction and updating personal information

Generally, we will provide you with access to your personal information that we hold within a reasonable time of a request unless an exception applies under the Privacy Act. If you believe the personal information that OpenMarkets holds is inaccurate, incomplete or out-of-date and we agree we will amend it. If we disagree with you about the accuracy, completeness or currency of our records, then you have the right to request that we note your disagreement in our records.

You should keep us informed of any changes to your information by notifying us in writing (which may be through your financial adviser or stockbroker). We may also ask you to review, confirm and advise of us changes to your personal information.

### Storage and security of information

OpenMarkets stores personal information in a combination of computer storage facilities, paper-based files and other records. We will take reasonable steps to protect personal information from loss, misuse, unauthorised access, modification or disclosure.

### Overseas disclosure of personal information

We may transfer personal information to related bodies corporate, unaffiliated service providers or other persons to whom we disclose personal information as described herein in locations beyond Australia (including, but not limited to, the United States, India, Vietnam, Singapore and the United Kingdom) in the course of storing that information and when using or disclosing it for one of the purposes referred to above. When transferring personal information to foreign jurisdictions, OpenMarkets may take steps to ensure the overseas recipient of the information does not breach the Australian Privacy Principles in relation to the information. However, OpenMarkets may be unable to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to your information.

This may mean for information sent overseas you do not have the protections of or any redress under the Privacy Act or in the foreign jurisdiction for any breach. The overseas recipient may not be subject to privacy obligations equivalent those under the Privacy Act and could be compelled by foreign law to make disclosure of the information. By using OpenMarkets services you consent to OpenMarkets making the disclosure to overseas recipients on this basis.

### Cookies

A 'cookie' is a packet of information placed on a user's computer by a website for record keeping purposes and includes the type of browser and operating system you are using, the device that you used to visit our service (e.g. mobile, tablet, desktop), the resolution of your display screen and your computer's IP (Internet Protocol) address which we use to better understand which country you are visiting from, the web address of any website that may have referred you to our service. We use cookies to better customise the OpenMarkets services, monitor the performance of our website and remember you as a repeat visitor. You can choose to turn off cookies in your browser, but this may impact on your access to the OpenMarkets platform.

### Storage and security of information

OpenMarkets stores personal information in a combination of computer storage facilities, paper-based files and other records. We will take reasonable steps to protect personal information from loss, misuse, unauthorised access, modification or disclosure. We protect the information we store by using security frameworks and encryption techniques to protect our systems and your account from unauthorised access. If after a period of time (generally 7 years) we are no longer required to hold your personal information, we may delete or destroy it.

### Contacting us and complaints

If you wish to contact us for any purpose regarding this policy including making complaint about the way we have handled your personal information (including if you think we have breached the Privacy Act) you may do so to our Compliance Manager in writing, to the address set out at the end of this policy.

When you contact us, include your email address, name, address and telephone number and clearly describe your complaint. Our Compliance Manager will investigate the complaint and respond to you promptly. If you consider that we have failed to resolve the complaint satisfactorily, and you are an individual located in Australia, you can complain to the Office of the Australian Information Commissioner.

### Changes to this policy

This policy is subject to change from time to time as OpenMarkets considers necessary. We will publish material changes by making them available to you on our website.

OPENMARKETS AUSTRALIA LIMITED

Compliance Manager  
Level 2, 451 Little Bourke Street  
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AUSTRALIA