



PRIVACY POLICY

MITRADE GLOBAL PTY LTD
FEBRUARY 2022

PRIVACY POLICY STATEMENT

This privacy statement is made on behalf of Mitrade Global Pty Ltd (ACN 149 011 361 AFSL 398528). All references to "Mitrade", "we", "us" or "our" in this policy are references to Mitrade Global Pty Ltd.

Mitrade is committed to protecting your privacy and to compliance with the Australian Privacy Principles ('APPs') contained in the Privacy Act 1988 (Cth) ('Privacy Act'). If you have any questions relating to this privacy statement or your privacy rights, please contact us using the details provided under the 'Contact Us' heading below.

This Privacy Statement sets out the policy of Mitrade for management of personal information. We are committed to ensuring the privacy of your information and recognise that you, as a customer, are concerned about your privacy and about the confidentiality and security of information that Mitrade may hold about you.

This Policy is designed to inform customers of

- The Mitrade Privacy Policy;
- What information we collect and the purposes for which we collect it;
- Use, holding and disclosure of information collected to domestic and overseas recipients;
- Security of your personal information;
- Gaining access to information we hold about you;
- What to do if you believe the information we hold about you is inaccurate;
- Complaints in relation to privacy; and
- How to contact us.

Personal Information

Personal information is defined as:

"information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information is recorded in a material form or not."

Mitrade will collect any personal information necessary for the purposes of ensuring compliance with its obligations under the Corporations Act 2001 (Cth) ('Corporations Act') and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) ('AML/CTF Act').

The information we collect from you will depend on what services we provide to you and may include your:

- name;
- date of birth;
- residential address;
- phone numbers;
- email addresses;
- occupation;

- bank account details;
- Identification documentation, as required under the AML/CTF Act, including:
 - o passport
 - o driver's licence
 - o national identity card
 - o utility bills
- financial information, including details of
 - o your investments; and
 - o taxation information;
- other information we consider necessary to our functions and activities

Open and transparent management of personal information

Mitrade seeks to ensure that personal information we hold about an individual is managed in an open and transparent manner. We have implemented procedures to ensure compliance with the APPs and any applicable codes, and to deal with any complaints relating to our compliance with those provisions.

Mitrade has a clear and up-to-date privacy policy outlining our management of personal information, including details regarding the kind of personal information we collect and hold; how and why we collect and hold this information, and how an individual may access and seek correction of the information we hold about them. We further provide details regarding our complaints handling process and our policy on disclosure of information to overseas recipients (and if so, which countries).

Collection of personal information

This policy details how Mitrade adheres to the APPs regarding the collection of solicited personal information. Where possible, Mitrade collects personal information directly from individuals via the account application form. We also collect personal information about individuals indirectly from our website and credit reference agencies, which is reasonably necessary for the provision of our services, and only by lawful and fair means. Information is generally sought through our account application forms, in which the purpose is articulated. The collection of the information is consented to in the Client Agreement which you must agree to before receiving our services. Accordingly, we will always ensure you are informed of our purpose in collecting information, and your right to gain access to such information. If you do not provide the information requested, we may be unable to provide you with our services.

Circumstances where we may collect, use or disclose your information without consent are:

- Where we are required to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority (such as AUSTRAC, ASIC or the ATO);
- For the purpose of verifying your identity and establishing your account (this may include third parties carrying out credit or identity checks on our behalf);

- Where there is a life/health emergency with serious and imminent threat to life, health and safety;
- Where there is a serious threat to public health or safety; or
- For the purpose of investigating or reporting a suspected unlawful activity.

Please note that generally we will only use the personal information we collect for the main purposes disclosed at the time of collection such as to provide financial services. Please see below for further information about how Mitrade uses and discloses personal information. We may also collect demographic information when you open an account, including birth date, education, occupation, etc. We also assess your trading experience, your approximate annual income and approximate net worth to assess your financial position.

- We do not store clients' payment information apart from the card number, expiration date, and card holder's name, which we require for tax, government regulatory, and security purposes.

In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit.

We also collect information about you indirectly from our website www.mitrade.com when we receive emails and online forms. This information will only identify who you are if you provide us with your details (eg. if you e-mail your contact details to us). When you visit our website our web server collects the following types of information for statistical purposes:

- your Internet service provider's address;
- the number of users who visit the website;
- the date and time of each visit;
- the pages accessed and the documents downloaded;
- the type of browser used.

No attempt is made to identify individual users from this information. The Mitrade website contains links to the websites of third parties. If you access those third-party websites they may collect information about you. Mitrade does not collect information about you from the third parties, nor can Mitrade take responsibility for the protection of your privacy on those third-party websites. You will need to contact them to ascertain their privacy standards.

You can view and access our Privacy Policy by visiting our website.

Cookies

A cookie is a small text file placed on your computer hard drive by a web page server. Cookies may be accessed later by our web server. Cookies store information about your use of our website. Cookies also allow us to provide you with more personalised service when using our website.

Mitrade uses cookies to:

- determine whether you have previously used the Mitrade website;
- identify the pages you have accessed; and
- facilitate administration of the site and for security purposes.

Most web browsers are set to accept cookies but you may configure your browser to notify you each time a cookie is offered before accepting or not to accept cookies. If you set your browser to reject cookies you may not be able to make full use of the Mitrade website. You can also delete cookies from your hard drive. Instructions on how to accept cookies, on how to be notified that a cookie is being offered and how to delete cookies are available through your respective web browser.

We may share website usage information about visitors to the website with reputable advertising companies for targeting our Internet banner advertisements on this site and other sites. For this purpose, pixel tags (also called clear gifs or web beacons) may be used to note the pages you have visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.

To administer and improve our website, we may use a third party to track and analyse usage and statistical volume information, including page requests, form requests, and click paths. The third party may use cookies to track behaviour and may set cookies on behalf of us. These cookies do not contain any personally identifiable information.

Unsolicited personal information

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

Notification of the collection of personal information

When we obtain personal information about you, we ensure that you have our contact details and that you are aware of the collection of information and our purposes for doing so. As per above, we are unable to provide certain services if the requested information is not provided. We do not disclose your information to third parties, unless they are related entities or services providers, in which case they are required to conform to our procedures.

Use and disclosure of personal information

Mittrade collects and holds personal information about an individual for the purpose of providing financial services. We collect this information with your consent as per our application form or other documentation, for the primary purpose disclosed to you at the time of collection.

However, in some cases Mittrade will use or disclose personal information for secondary purposes (any purpose other than a primary purpose). Personal information obtained to provide financial services may be applied to secondary purposes if the secondary purpose is related to the primary purpose of collection, or in other circumstances authorised by the Privacy Act and the person concerned would reasonably expect the personal information to be used or disclosed for such secondary purpose.

Mittrade takes all reasonable steps to ensure that it only uses or discloses personal information that is relevant to the purpose for which the personal information is used or disclosed.

In some cases, we may ask you to consent to any collection, use or disclosure of your personal information. Your consent will usually be required in writing but we may accept verbal consent in certain circumstances.

We may use your personal information to:

- provide you with our products and services;
- review and meet your ongoing needs;
- provide you with information we believe may be relevant or of interest to you;
- let you know about other products or services we offer, send you information about special offers or invite you to events;
- consider any concerns or complaints you may have;
- comply with relevant laws, regulations and other legal obligations;
- help us improve the products and services offered to our customers and enhance our overall business.

We may disclose your personal information to:

- a related entity of Mitrade;
- our agents, contractors or third-party service providers to enable them to provide administrative and other support services to us;
- our affiliates, if the information is required to provide the product or service you have requested, or to provide you with an opportunity to participate in their products or services; and
- organisations involved in managing payments, including payment merchants and other financial institutions, such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- financial product issuers and credit providers; and
- anyone else to whom you authorize us to disclose it or is required by law.

To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a party with client information from our database to help us to analyse and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task we request and for no other purpose.

Mitrade requires any party that has access to personal information to conform to our privacy standards.

You may direct us not to disclose your personal information to certain non-affiliated third parties. To opt out of sharing personal information with non-affiliated third parties, please contact our Privacy Officer using the details below. An opt out election made by one account owner of a joint account is applicable to all account owners of the joint account.

Direct Marketing

Mitrade will only use personal information obtained for the provision of financial services, for the secondary purpose of direct marketing where:

1. Mitrade collected the personal information from the individual; and
2. Mitrade's contact details are provided in each communication; and
3. The individual would reasonably expect Mitrade to use or disclose the information for the purpose of direct marketing; and
4. Mitrade provides and informs the client of a simple means through which an individual can request to not receive marketing communications; and

5. The individual has NOT requested such communications cease.

There is no fee charged for receipt of direct marketing material or removal from the mailing list.

Often the law requires us to advise you of certain changes to products/services or regulations. You will continue to receive this information from us even if you choose not to receive direct marketing information from us. We will not disclose your information to any outside parties for the purpose of allowing them to directly market to you.

Cross border disclosure/Sensitive information/Use of government identifiers/Anonymity & Pseudonymity

Mitrade does not, for the purposes of the Privacy Act, collect sensitive information. Wherever lawful and practicable, individuals may deal anonymously with Mitrade but given the nature of our services, it is unlikely that this will be a viable option. Mitrade does not use official identifiers (e.g. tax file numbers) to identify individuals. An individual's name or Australian Business Number is not an identifier for the purposes of the Privacy Act and hence may be used to identify individuals.

We may disclose your personal information to external parties who act on our behalf in the operation of our business or in connection with the transactions to be undertaken. These include companies like GBG or Equifax, which electronically verify the identification information that our clients provide. Such external parties are required and committed to protecting your privacy, and Mitrade will only choose external service providers who are compliant with the APPs

Mitrade may also share/transfer personal information to its related companies that may be located outside of Australia in some circumstances.

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable to ensure that the recipient does not breach the Privacy Act, the APPs;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the APPs, we will not be accountable for that breach under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

Quality of personal information

Mitrade takes all reasonable steps to ensure the personal information we collect, use, and disclose is relevant, accurate, up-to-date and complete. We verify personal information at the point of collection. The accuracy of records is also maintained by regular mail-out of statements.

Mitrade encourages you to help us by telling us immediately if you change your contact details (such as your phone number, street address or email address) or if any of your details need to be corrected or updated. A person wishing to update their personal information may contact our staff or the Privacy Officer on the contact details shown within this document. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

Accessing and correcting personal information

Individuals have a right to request access to their personal information and to request its correction, subject to the exceptions set out in the Privacy Act. Mitrade will correct personal information where that information is found to be irrelevant, inaccurate, incomplete or out of date. We will not charge you a fee for your access request but may charge you the reasonable cost of processing your request.

If a person wishes to access their personal information or correct it, they should contact the Privacy Officer using the contact details listed below, and we will provide such information within 30 days of the individual's request. We require identity verification and specification of what information is required.

You may also have the right to request us to delete your personal data. If you request that we delete your personal data this will result in the automatic closure of your account and we will remove your personal data from active processing. However, we will be required to maintain your personal data to comply with our legal and regulatory requirements.

Mittrade may not always be able to give you access to all the personal information we hold about you. If this is the case, we will provide a written explanation of the reasons for our refusal of your access request, together with details of our complaints process for if you wish to challenge the decision.

We may not be able to give you access to information in the following circumstances:

1. Where we reasonably believe this may pose a serious threat to the life, health or safety of any individual or to public health/safety;
2. Where access would unreasonably impact the privacy of another individual;
3. Where such request is reasonably considered to be frivolous or vexatious;
4. Where the information relates to existing or anticipated legal proceedings which would otherwise not be accessible in the discovery process relating to such proceedings;
5. Where giving access would reveal our intentions and thereby prejudice our negotiations with you;
6. Where giving access would be unlawful;
7. Where denying access is required or authorised by or under an Australian law or a court/tribunal order;
8. Where the organisation has reason to suspect unlawful activity or serious misconduct relating to the organisation's functions or activities has been, is being or may be engaged in, and giving access would likely prejudice the taking of appropriate action in relation to the matter;
9. Where enforcement activities conducted by or on behalf of an enforcement body may be prejudiced; or
10. Where access would reveal evaluative details generated within the organisation regarding a commercially sensitive decision-making process.

If Mitrade intends to refuse to comply with your correction request, we will notify you in writing of our reasons for such refusal, and the complaints process you may avail if you wish to challenge that decision. You may also request that we associate the personal information we hold with a statement regarding your view of its inaccuracy.

Security of personal information

We take reasonable steps and precautions to keep personal information secure from loss, misuse, and interference, and from unauthorised access, modification or disclosure. If you use the Internet to communicate with us, you should be aware that there are inherent risks in transmitting information over the Internet. Mitrade does not have control over information while in transit over the Internet and we cannot guarantee its security.

Mitrade stores client information in our own internal systems/database, which we monitor for compliance with Payment Card Industry (PCI) standards. We perform regular backups to tape to mitigate against the risk of inadvertent loss of information. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system and passwords are routinely checked;
- data ownership is clearly defined;
- we change employees' access capabilities when they are assigned to a new position;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- unauthorised employees are barred from updating and editing personal information;
- all computers which contain personal information are secured both physically and electronically;
- data is encrypted during transmission over the network; and
- print reporting of data containing personal information is limited.

Where information is no longer required to be held or retained by Mitrade for any purpose or legal obligation, we will take all reasonable steps to destroy or de-identify the information accordingly.

Where our employees work remotely or from home, we implement the following additional security measures:

- two-factor authentication is enabled for all remote working arrangements;
- password complexity is enforced, and employees are required to change their password at regular intervals;
- we ensure that employees only have access to personal information which is directly relevant to their duties;
- employees are not permitted to work in public spaces;
- we use audit trails and audit logs to track access to an individual's personal information by an employee;
- we monitor access to personal information, and will investigate and take appropriate action if any instances of unauthorised access by employees are detected;
- employees must ensure that screens are angled so that they cannot be used by anyone else, and are locked when not in use;
- employees must ensure that no other member of their household uses their work device;
- employees must store devices in a safe location when not in use;
- employees may not make hard copies of documents containing personal information, nor may they email documents containing personal information to their personal email accounts; and
- employees may not disclose an individual's personal information to colleagues or third parties, via personal chat groups.

Responsibilities

It is the responsibility of management to inform employees and other relevant third parties about this Privacy Policy. Management must ensure that employees and other relevant third parties are advised of any changes to this Privacy Policy. All new employees are to be provided with timely and appropriate access to this Privacy Policy, and all employees are provided with training in relation to appropriate handling of personal information. Employees or other relevant third parties that do not comply with this Privacy Policy may be subject to disciplinary action.

Notifiable Data Breaches Scheme

Mittrade recognises and aims to remain fully compliant with its obligations under the Notifiable Data Breaches Scheme within the Privacy Act. In the event that personal information held by Mittrade is subject to unauthorised use, access or disclosure, and such an event is likely to cause serious harm, Mittrade will take all steps necessary to notify affected individuals and the Office of the Australian Information Commissioner.

Contractual arrangements with third parties

We ensure that all contractual arrangements with third parties adequately address privacy issues, and we make third parties aware of this Privacy Policy.

Third parties will be required to implement policies in relation to the management of your personal information in accordance with the Privacy Act. These policies include:

- regulating the collection, use and disclosure of personal and sensitive information;
- de-identifying personal and sensitive information wherever possible;
- ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties; and
- ensuring that the personal and sensitive information is only disclosed to organisations which are approved by us.

Privacy Complaints

We have an effective complaints handling process in place to manage privacy risks and issues. Please refer to our Complaints Policy on our website for more information.

The complaints handling process involves:

- identifying (and addressing) any systemic/ongoing compliance problems;
- increasing consumer confidence in our privacy procedures; and
- helping to build and preserve our reputation and business

If you have any questions about this Privacy Policy, or have a complaint relating to our compliance with privacy laws or our treatment of your personal information, please contact our Privacy Officer using the details provided under the "Contact Us" heading below or using the contact details located on our website. We will investigate your complaint and endeavour to resolve the issue to your satisfaction within 30 days.

If you are not satisfied with the outcome of your complaint, you have the right to refer your complaint to the Office of the Australian Information Commissioner by

1. telephone: 1300 363 992
2. email: enquiries@oaic.gov.au
3. writing to Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001, AUSTRALIA.

Contact Us

If you would like to contact us regarding a request to access or correct personal information we hold about you, or would like to communicate a concern about the way your personal information is handled, you should firstly contact us by:

1. email: cs.au@mitrade.com
2. live chat: www.mitrade.com
3. writing to: Privacy Officer, Level 11, 350 Collins Street MELBOURNE VIC 3000 AUSTRALIA
4. telephone: + 61 3 9606 0033.

Updates

This Privacy Policy will be reviewed by Mitrade in an ongoing manner and may be amended or updated from time to time to reflect administrative or legal changes to our operations and the business environment. You are encouraged to check our website for any updates on a regular basis.



MITRADE GLOBAL PTY LTD

LEVEL 11,
350 COLLINS STREET,
MELBOURNE, VIC 3000,
AUSTRALIA

WWW.MITRADE.COM | CS.AU@MITRADE.COM