

## Privacy Policy

This Privacy Policy explains how Compass Global Holdings Pty Limited, its associated or related companies trading as Compass Global Markets™ (collectively “Compass Global Markets” or “Compass Group” or “we” or “us”) collect, use, hold, store and manage the personal information that we collect about our clients (“you”), how we share your information and the steps we take to protect your information. Specifically, this policy covers:

- What is personal information?
- How and why we collect and use your information
- How we hold personal information
- Cookies
- Sharing Your Information
- Sharing Outside of Australia
- Accuracy and Alteration
- Your rights
- How to contact us

We are bound by the Privacy Act 1988 (Cth.) (Privacy Act) and we will protect your information in accordance with the Australian Privacy Principles.

Before you provide us with any personal information you should read this Privacy Policy. This Privacy Policy should be read in conjunction with Compass Global Markets’ Client Agreement.

When you provide us with any personal information, register for an account with us, or ask us to provide you with any of our products or services, you agree that we may handle your information in accordance with this Privacy Policy. If you do not agree with the terms of this Privacy Policy then you should not provide us with any of your information.

Please note that we may update this Privacy Policy from time to time by posting a new version on our website and/or providing you with express notice of specific changes. You should check our website periodically for any changes. Continued use of the Compass Global Markets website is acknowledgement of having read and accepted such changes.

## What Is Personal Information?

Personal information includes any information or opinion about an identified individual or an individual who can be reasonably identified from this information. This could include your name, address, date of birth and contact details. During the life of your product or service, we may collect and hold additional personal information about you which may include transaction information and a record of any complaints or queries made by you.

## How and Why We Collect and Use Your Information

Generally we collect personal information which is necessary to provide you with a specific product or service and you have consented to that collection from you directly.

The main reason we collect, use, hold, store and manage the personal information that we collect about you, is to provide you with products and services. This includes:

- Giving you information about a product or service;
- Checking that we can provide the product or service to you;
- Helping you where online applications are not completed;
- Registration and administration of your account;
- Providing you with a product or service; and
- Helping you manage the product or service;
- Updating our records about you;
- Responding to and processing your queries and requests; and
- Satisfying our legal obligations

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction to prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business. We may also use your information to tell you about products or services we think may interest you.

We collect most personal information directly from you, for example when you register with us, apply for or use a product or service or talk to us on the telephone. We also collect information electronically such as when you visit our website or apply for or access Compass Global Markets products and services electronically.

Sometimes we collect personal information about you from other people or organisations and this may occur without your direct involvement. For example we may collect information about you from publicly available sources of information, such as public registers, or other organisations which jointly with us, provide products or services to you or commercial information service providers.

We will collect details of transactions you carry out through our website and of the fulfilment of such transactions. Personal information is only collected directly from you, except where another person has been authorised to act on your behalf (such as your legal or financial advisers) or consent has been provided.

Where you permit the use of cookies (see section 'Cookies' below), we use them to:

- Help personalise your web experience;
- Ensure you can navigate our website efficiently; and
- Perform certain functions.

Due to their core role of enhancing and enabling usability or website processes, disabling cookies may prevent you from using certain parts of our website. It will also mean that some features on the website will not function if you disable cookies.

We are required or authorised to collect certain identification information about you by the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth.)* and *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No.1)*.

### ***Requesting Access to Tools and Information***

You may wish to have access to certain tools and information made available on our website, before you decide that you would like to register to use our services, including our foreign exchange and payment services. We may collect your information as part of this access and use your information so that we can supply you with information about our services, our products, relevant market information and disclosure documentation to satisfy our legislative obligations.

### ***Marketing***

We will use your personal information to offer you products and services and reports which we believe may interest you, but we will not do so if you tell us not to. These products and services may be offered by Compass Global Markets.

Upon applying for Compass Global Markets' products and services, you have the ability to opt out of receiving information about Compass Global Markets' products and services and / or the products and services of its associates or related companies as well as special offers. If you currently receive such information and no longer wishes to do so, you can email Compass Global Markets advising Compass Global Markets that you no longer wish to receive such information. You are entitled to change your marketing preferences at any time.

### ***Monitoring***

We may monitor and record our telephone calls with you, with or without an automatic warning message or tone, and use any transcripts of them:

- To ensure we fully understand the instructions you give us and our obligations to you,
- To ensure we have a clear record of the products and services you have requested,
- For the purposes of the prevention or detection of money laundering, terrorism financing, financial crime, or fraud,
- For the purposes of training and quality control,
- To resolve any dispute between you and Compass Global Markets in respect of a foreign exchange transaction or service.

## How we hold personal information

### Information Security

#### *General*

Much of the information we hold about you will be stored electronically in secure data centres in Australia and overseas. See the section “Sharing outside of Australia” for more detail.

We use your information only in accordance with this Privacy Policy and take all steps reasonably necessary to ensure we keep your information secure, for example by:

- encrypting our online service via a secure 128-bit SSL security service,
- providing you with password protection and a log-in process,
- making our online service automatically log you out after several minutes of non-use,
- disabling your access after multiple failed log-in attempts, or
- maintaining our servers in multiple secure locations and having our online service penetration tested regularly by external experts.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

#### *Your Instructions*

Where we share your information with people or businesses which you ask us to deal with or who you already know or who already know you, wherever they are based, we will not normally make any further enquiry concerning them or take any further steps to ensure your information is protected.

#### *Worldwide Web*

The Internet is not a secure environment. While we take reasonable measures to keep your information secure, we cannot guarantee your online data security. We are not liable to you for any loss of data, injury or harm which occurs to you as a result of the transmission of your information over the Internet, unless this occurs as a result of our negligence or wilful misconduct.

#### *Social Media*

We will not ask you to supply personal information publicly over Facebook, Twitter or any other social media platform that we use. Although we may invite you to send details to us (such as answering a question about your account) using private messaging.

## **Data Storage and Security**

Compass Global Markets takes reasonable steps to ensure that the personal information collected from you is protected against loss, unauthorised access, use modifications, disclosure and against other misuses.

The Compass Global Markets online application form, through which your personal information is captured, is encrypted via a secure 128-bit SSL security system. Encryption converts information into an encoded format before it is sent over the internet, along with the use of firewalls.

Personal information is stored in a combination of computer and paper based files. Compass Global Markets representatives are adequately trained on their obligations to maintain the confidentiality of client's personal information.

## **Cookies**

Cookies are harmless text files that web servers can store on your computer's hard drive or in memory upon visiting a website. Cookies can record information about your visit to the website and allow it to remember you the next time you visit and allow a more meaningful experience the next time you visit the website. They are commonly used by companies providing online products and services.

Each time you visit our website, we collect information about your use of the website, which may include:

- The date and time of visits;
- The pages which are viewed;
- How the website is navigated by users and how users interact with the website, including fields completed in registrations and application forms;
- Users' location information;
- Information about the device used to visit our website; and
- IP addresses.

Compass Global Markets uses cookies that Compass Global Markets creates and cookies that are created by third parties (for example, by those who supply products and services to Compass Global Markets) so that Compass Global Markets can provide you with Compass Global Markets' products and services.

There is no obligation to accept cookies that Compass Global Markets sends browsers can be modified so that it will not accept cookies. It is advised to follow the instructions (usually located within the "Help", "Tools" or "Edit" facility) to enable or disable cookies. However, it must be noted that in order to view and/or use some of Compass Global Markets' products and services, and to enable some of the protection Compass Global Markets provides for your financial and personal information, cookies are required on your browser. Disabling the use of cookies may therefore affect

Compass Global Markets' ability to provide you with our products and services, the effectiveness of Compass Global Markets' products and services or Compass Global Markets' ability to properly protect you.

## **Sharing Your Information**

We may share your information with other members of the Compass Group where we need to provide you with any of the products or services you have requested, or where you have asked us to do so. We may share your data with other members of the Compass Group when you have accepted other Compass Group company terms and conditions because you would like obtain products and services from another member of the Compass Group.

We may also provide personal information about you to organisations outside the Compass Group. To protect personal information, we require our service providers that hold and process such information on our behalf to follow appropriate standards of security and confidentiality. In addition we seek to ensure that data is not retained by our service providers once our arrangement with them has concluded.

In general, we disclose personal information to organisations that assist us with our business. These may include:

- Agents, contractors and external service providers (such as technology service providers and mailing houses);
- Authorised representatives who provide services in relation to our products;
- Payment system operators;
- Other organisations, who jointly with us, provide products or services to you;
- Our legal advisers, financial advisers or auditors
- Your representatives, anyone (for example, an agent) who you have told us or who we are otherwise aware is acting on your behalf, or who introduces you to us, or who you have asked us to contact;
- Fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- External dispute resolution schemes;
- Regulatory bodies, government agencies and law enforcement bodies in any jurisdiction; and
- Credit control or debt collection agencies, for example, if you owe us money and we engage their services to recover it from you.

## **Sharing Outside of Australia**

We run our business in Australia and overseas. We may need to share some of your information with organisations outside Australia which provide services to us, which are likely to be located in the United States, New Zealand, Cambodia, Thailand and the Philippines. Sometimes, we may need to ask you before this happens.

For international transactions, such as currency exchanges, we may need to disclose your information to the corresponding international party in order to process the transaction. The countries we disclose your information to will depend on the details of the transaction you ask us to carry out.

We may store our information in cloud or other types of electronic or network storage. As networked or electronic storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under foreign law. In those instances, we will not be responsible for that disclosure.

## **Accuracy and Alteration**

Compass Global Markets aims to keep personal information obtained from you accurate, complete and up-to-date.

Upon accepting the Client Agreement, you agree that you are responsible for ensuring that the details you provide to Compass Global Markets to perform the services are true, accurate and up-to-date. You agree not to withhold or omit any information that would render those details false or inaccurate. You agree to notify Compass Global Markets immediately where you become aware of any error or change in the details you have supplied to Compass Global Markets. This can be done by contacting us by phone, post, email or by logging into your account online.

## **Your Rights**

In the event where you have a concern with the privacy of your personal information, or there has been a breach or potential breach of the Privacy Act, you can submit your concern or complaint in writing directed to the 'Privacy Officer' at [info@compassmarkets.com](mailto:info@compassmarkets.com) and Compass Global Markets will endeavour to resolve the concern internally at its earliest convenience by responding in writing.

Under the Privacy Act, you have the right to request access and correct personal information held by Compass Global Markets. You may submit in writing a request to access your personal information. Compass Global Markets has the right to refuse to provide you with access to the personal information, and a reason will be provided where access has been denied except where it would be unreasonable to do so.

In the event that you become aware, or believe, that any personal information which Compass Global Markets holds about you is inaccurate, incomplete or outdated, you should contact Compass Global Markets and provide relevant accurate, complete and up to date personal information. Compass Global Markets will, if it agrees that the information requires correcting, take all reasonable steps to correct the information. Compass Global Markets will endeavour to respond to any request for access within 14 to 44 days depending on the complexity of the information and/or the request. If the request is urgent you should indicate this clearly. If we refuse you request to

correct personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

There is no fee for requesting that your personal information is corrected or for Compass Global Markets to make corrections. In processing your request for access to your personal information, Compass Global Markets may charge a reasonable administration fee to cover its costs in locating and supplying the information.

## **How to Contact Us**

If you have any questions about our Privacy Policy or your information, please contact us in writing by email at [info@compassmarkets.com](mailto:info@compassmarkets.com) alternatively you can write to the Compliance Officer at:

Compass Global Markets – Suite 33, 650 George Street, Sydney NSW 2000, Australia.

If you have a complaint about the way in which Compass Global Markets has handled the privacy of your personal information you should, in the first instance, contact Compass Global Markets. The Privacy Officer will then investigate the complaint and will generally try to resolve the complaint within 10 business days, but in any case within 30 days. If you are unhappy with the response of Compass Global Markets' Privacy Officer, you are entitled to contact the Office of the Australian Information Commissioner, which may investigate your complaint further.