



PRIVACY POLICY

PrimaryMarkets Pty Ltd ABN 24 136 368 244 and its related entities (**PrimaryMarkets, we, us or our**) has implemented this Privacy Policy to provide users of our website <http://www.primarymarkets.com> (**Website**) and our other services with information about how we collect, hold and use personal information you provide to us. We are committed to protecting your privacy. PrimaryMarkets is bound by the Privacy Act 1988 (Cth) (**Privacy Act**) and must protect your personal information according to that Act and other applicable laws, such as the Spam Act 2007 (Cth) (**Privacy Laws**).

By using our website, you consent to the collection and use of your personal information by PrimaryMarkets as explained below. In addition to the Privacy Policy, our Terms and Conditions of Use and our Platform Trading Rules shall apply to you and everyone else who uses this Website.

1. What is personal information?

"Personal Information" is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from that information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it. Some examples of personal information may include (without limitation) your:

- a. name;
- b. mailing or residential address details;
- c. contact details such as telephone numbers, email address, social media platform username;
- d. government issued identifiers such as Tax File Number, Medicare number or Driver's License number;
- e. bank account and credit card details;
- f. photograph, video or audio recording;
- g. corporate affiliations; and
- h. sensitive information such as information relating to your criminal history.

2. What kinds of personal information do we collect and hold?

The personal information that we collect about you will depend on the products or services that you apply for or enquire about. If you do not allow us to collect all of the personal information we reasonably request, we may not be able to deliver those products or services to you. Throughout the life of your product or service, we may also collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaints you make. Our collection of "*sensitive information*", a specialtype of personal information under Privacy Laws, is further restricted to circumstances where we have obtained your express consent and to certain other permitted situations. Generally, we only collect this sort of information if it is reasonably necessary to provide you with a specific product or service and you expressly consent to our collection.

3. How do we collect personal information?

- a. We collect most personal information directly from you whether in person, on the phone or electronically, for example when you interact with PrimaryMarkets to:

- i. apply for, register your interest in, or enquire about a product, opportunity or service;
 - ii. provide us with feedback or make a complaint;
 - iii. visit our websites, online services or use our mobile or tablet applications; and
 - iv. talk to us or do business with us.
- b. From time to time we collect personal information about you from third parties or organisations. For example, we may collect personal information about you from:
 - i. publicly available sources of information, such as public registers;
 - ii. your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
 - iii. other organisations, who jointly with us, provide products, opportunities or services to you or with whom we partner to provide products, opportunities or services to you; and
 - iv. service providers, such as companies that provide fraud prevention reports.

4. Do we collect personal information electronically?

- a. We may collect information from you electronically, for instance through internet browsing on our websites, , mobile or tablet applications. Each time you visit our websites, we may collect information about you which may include personal information (such personal information will be deidentified) and may include the following:
 - i. the date and time of visits;
 - ii. the pages viewed and your browsing behaviour;
 - iii. how you navigate through the site and interact with pages (including fields completed in forms and applications completed);
 - iv. general location information;
 - v. information about the device used to visit our website (including your tablet or mobile device) such as device IDs; and
 - vi. IP addresses. Your IP Address is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP).
- b. We collect information using cookies when you use our websites, mobile or tablet applications. Cookies are small pieces of information stored on your hard drive or in memory. One of the reasons for using cookies is to offer you increased security. They can also record information about your visit to our websites, allowing us to remember you the next time you visit and provide a more meaningful experience.
- c. We may also collect information from third party websites, applications or platforms containing our interactive content or that interface with our own websites and applications. We may collect personal information about you from social media platforms if you publicly comment but we will never ask you to supply personal information publicly over Facebook, Twitter, LinkedIn or any other social media platform that we use.
- d. Sometimes we may invite you to send your details to us via private messaging. You may also be invited to share your personal information through secure channels to participate in other activities.

5. Personal information about third parties.

- a. If we receive personal information about you that we do not request directly from you or from another party, we will decide whether we could have collected the information in accordance with this Privacy Policy and applicable Privacy Laws.

- b. If we decide that we could have collected the information in accordance with this Privacy Policy and applicable Privacy Laws, we will keep the information and handle it in accordance with this Privacy Policy and applicable Privacy Laws.
- c. If we decide that we could not have collected the personal information in accordance with this Privacy Policy and applicable Privacy Laws, we will destroy or de-identify the information if it is lawful and reasonable to do so.

6. For what purposes do we collect, hold, use and disclose personal information?

- a. The main reason we collect, use, hold and disclose personal information is to provide you with products, opportunities and services (including where applicable, third party products and services) and to help us run our business. This includes:
 - i. checking whether you are eligible for the product or service;
 - ii. assisting you where online applications are not completed;
 - iii. providing the product or service;
 - iv. helping manage the product or service;
 - v. helping us develop insights and conduct data analysis to improve the delivery of products,
 - vi. services, enhance our customer relationships and to effectively manage risks; and
 - vii. understanding your interests and preferences so we can tailor digital content.
- b. We may also de-identify your personal information which we have collected for the purposes described in this Privacy Policy. As a result, this Privacy Policy will generally not apply to our use of de-identified information. However, we will continue to safeguard this de-identified information.
- c. Where we use de-identified information together with other information (including personal information) and in doing so, we are able to identify you, that information will be treated as personal information in accordance with this Privacy Policy and applicable Privacy Laws.
- d. We may use or disclose your information to comply with our legislative or regulatory requirements in any jurisdiction and to prevent fraud, criminal or other activity that may cause you, us or others harm including in relation to products or services.

7. How we use your Personal Information

- a. We use the Personal Information we collect about you for our business functions and activities, which may include the following:
 - i. To administer our relationship with you including responding to your queries;
 - ii. To confirm your identity in order to create your member account and ensure that you are eligible to use the services provided on the Website;
 - iii. To conduct required Know Your Client, Anti-Money Laundering and Counter Terrorism and Financing Australian legislation regime checks on you in connection with your use of the Website;
 - iv. To review any marketing or other information that you may make via the Website;
 - v. To confirm that you are eligible to register an account through the Website including in accordance with relevant legislation;
 - vi. To provide services through the Website including allowing you to contact other members using the information on the Website;
 - vii. To monitor, improve and administer the Website and the services provided on the Website;
 - viii. To enable us to create a user profile to better serve you;
 - ix. To enable us to conduct surveys and aggregate user profiles;

- x. To ensure security of the Website and your user profile;
 - xi. To train our staff and provide quality assurance;
 - xii. To process any job application submitted by you;
 - xiii. To provide you with information on selected opportunities and listings and services that we think may be of interest to you (unless you have asked us not to do so);
 - xiv. To enable us to comply with all our legal and regulatory obligations;
 - xv. To share your Personal Information with our related entities, business partners and our selected third parties;
 - xvi. To contact you to ensure customer satisfaction in respect of our role as a website provider and assist you in getting the best value from our service; and
 - xvii. If you are an employee or other representative of a client to which we provide our services or a supplier or service provider to us, to communicate with you about your or your employer's engagement with us and otherwise as specified in this Privacy Policy.
- b. We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law, but we have no obligation to monitor the use of the Website or to retain the content of any user session.
 - c. In the event that we intend to enter into a corporate transaction, such as raising capital, a strategic alliance, sale of control of our or another business, we may disclose certain of your Personal Information to potential buyers, underwriters or advisors. If we do this, we will take reasonable precautions to ensure that the recipients of your Personal Information are obligated to keep it confidential.
 - d. We may, from time to time, expand, reduce or sell our business and this may involve the transfer of certain sections or the whole business to other parties. Your Personal Information will, where it is relevant to any such transaction, be transferred to the new owner or newly controlling party who will, under the terms of this Privacy Policy, be permitted to use your Personal Information for the purposes for which it was supplied by you.
 - e. You consent to us using your Personal Information in the above ways.
 - f. If you do not consent to us using your Personal Information in the above ways you must not provide your Personal Information to us. You should also not provide your Personal Information to us if you are under 18 years of age. If you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, we may not be able to provide you with requested products or services and access to some of the functionality of the Website.
 - g. We may collect and use your Personal Information for other purposes not listed above. If we do so, we will make it known to you at the time we collect or use your Personal Information.
 - h. We do not otherwise collect, use or disclose your Personal Information without your permission, unless the collection, use or disclosure is:
 - i. In accordance with this Privacy Policy or any agreement you enter into with us; or
 - ii. Required or authorised by law, including without limitation the Australian Privacy Principles under the *Privacy Act 1988 (Cth)*.
 - i. Access to certain content on our Website may be allowed under a written agreement between you or your employer and PrimaryMarkets and will require a username and/or password. In some cases, failure to provide personal information may prevent you from accessing certain PrimaryMarkets web site(s) containing certain confidential information, assets, services, opportunities or promotional offers. By accessing and

using our protected and secured Website(s), you agree to maintain the confidentiality of the username and password you selected to access such site(s).

8. What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- a. certain identification information about you by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) Rules; and
- b. your Tax File Number, if you choose to provide it, by the Income Tax Assessment Act 1936 (Cth).

9. For our customers located in the European Union.

The General Data Protection Regulation (GDPR) regulates the processing of personal information under European Union (EU) law. The GDPR aims to protect the information relating to individuals in the EU and harmonise data protection laws across EU Member States. Our collection, use, disclosure and processing of your personal information is regulated by the GDPR if:

- a. we offer products or services to you whilst you are located in the EU; or
- b. we monitor your behaviour whilst you are located in the EU.

10. How do we hold and protect your personal information?

- a. Much of the information we hold about you will be stored electronically. We store some of your information in secure data centres that are located in Australia. We also store information in other data centres of our contracted service providers (including cloud storage providers), and some of these data centres may be located outside Australia. Some information we hold about you will be stored in paper files.
- b. We use a range of physical, electronic and other security measures to protect the security, confidentiality and integrity of the personal information we hold both in Australia and overseas. For example:
 - i. access to our information systems is controlled through identity and access management controls;
 - ii. employees and our contracted service providers are bound by internal information security policies and are required to keep information secure;
 - iii. all employees are required to complete training about privacy and information security; and
 - iv. we regularly monitor and review our compliance with internal policies and industry best practice.
- c. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure for example, if you feel that the security of any account you have with us has been compromised, please immediately contact us (see Contact Us below).
- d. We take reasonable steps to destroy or permanently de-identify any personal information after we no longer need to hold or use it for any purpose under this Privacy Policy.

11. Who do we disclose your personal information to, and why?

- a. We may provide personal information about individuals to organisations outside PrimaryMarkets who help deliver or support the provision of our products, opportunities and services to you. To protect personal information, we enter into contracts with our service providers and other third parties that require them to

comply with applicable Privacy Laws and certain PrimaryMarkets policies and standards relating to data protection and information security. These contracts amongst other things, require our service providers to only use the personal information we disclose to them for the specific role we ask them to perform.

- b. Generally, we use contracted service providers to help us in our business activities. For example, they may help us provide you with products, opportunities and services, deliver technology or other support for our business systems, refer us to new customers, or assist us with marketing and data analysis. These organisations may include:
 - i. our agents, contractors and contracted service providers (for example, mailing houses, technology service providers and cloud storage providers);
 - ii. authorised representatives and credit representatives who sell or arrange products and services on our behalf;
 - iii. payment systems operators (for example, merchants receiving card payments);
 - iv. other organisations, who jointly with us, provide products, opportunities or services to you, or with whom we partner to provide products, opportunities and services to you;
 - v. other financial services organisations, including banks, superannuation funds, stockbrokers, custodians, fund managers, share registry providers and contracted service providers;
 - vi. debt collectors;
 - vii. professional advisors such as our financial advisers, legal advisers and auditors;
 - viii. your representatives (including your legal adviser, accountant, financial adviser, executor, administrator, guardian, trustee, or attorney);
 - ix. fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
 - x. external dispute resolution schemes; and
 - xi. regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.
- c. We may also disclose your personal information to others outside PrimaryMarkets where:
 - i. we are required or authorised by law or where we have a public duty to do so;
 - ii. you may have expressly consented to the disclosure or your consent may be reasonably inferred from the circumstances; or
 - iii. we are otherwise permitted to disclose the information under applicable Privacy Laws.

12. Do we disclose personal information overseas?

- a. We may disclose your personal information to a recipient located outside Australia. This may include the following:
 - i. our contracted service providers operating overseas, which are likely to be located in New Zealand, United States, India, the Philippines and the UK;
 - ii. organisations operating overseas with whom we partner to provide goods and services to you and who are likely to be located in the United States; and
 - iii. 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 will depend on the details of the transaction you ask us to carry out.

- b. When we do disclose and/or store personal information overseas, we protect that information using the security measures set out above and require overseas recipients to do the same (see How do we hold personal information).
- c. As a trusted service provider we ensure that our data protection and information security controls applying to your personal information in Australia continue to apply in the hand of our affiliates or contracted service providers located overseas.

13. Do we use or disclose personal information for marketing?

- a. We may use your personal information to directly offer you products, opportunities and services we believe may be of interest and value to you but we will not do so if you tell us not to. These products, opportunities and services may be offered by PrimaryMarkets or one of its preferred suppliers. We may offer you products, opportunities and services by various means, including by mail, telephone, email, SMS, WhatsApp or other electronic means, such as through social media or targeted advertising through PrimaryMarkets or non-PrimaryMarkets websites or through our online service.
- b. When we market products and services to you, we will comply with applicable Privacy Laws to obtain your consent if required.
- c. We may also disclose your personal information to companies outside PrimaryMarkets who assist us to market products and services to you (see Who do we disclose your information to, and why?). If you do not want to receive direct marketing offers from us or our affiliates or service providers, please contact us using the contact details or opt-out facility provided to you.

14. Access to and correction of personal information.

- a. You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us.
- b. There is no fee for requesting that your personal information is corrected or for us to make corrections.
- c. In some limited circumstances, there may be a reasonable charge for giving you access to your personal information. This charge covers such things as locating the information and supplying it to you.
- d. Under Privacy Laws your right to receive access to your personal information, or make corrections to it, is not absolute and exceptions exist. For example, we are not required to give you access to your personal information where giving you access would pose a serious threat to any person's life, health or safety, or to public health or safety, where giving access would be unlawful, where giving access would have an unreasonable impact on other people's privacy or where we reasonably conclude your request is frivolous or vexatious.
- e. If we refuse to give you access to or to correct your personal information, we will give you a notice explaining our reasons except where it would be unreasonable to do so. If we refuse your request to correct your 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.
- f. If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

15. Notifiable Data Breaches.

- a. The Privacy Act includes a Notifiable Data Breaches (NDB) scheme which requires us to notify you and the Office of the Australian Information Commissioner (OAIC) of

certain data breaches and recommend steps you can take to limit the impacts of a breach (for example, a password change).

- b. The NDB scheme requires us to notify about a data breach that is likely to result in serious harm to affected individuals. There are exceptions where notification is not required. For example, where we have already taken appropriate remedial action that removes the risk of serious harm to any individuals.
- c. If we believe there has been a data breach that impacts your personal information and creates a likely risk of serious harm, we will notify you and the OAIC as soon as practicable and keep in close contact with you about the nature of the breach, the steps we are taking and what you can do to reduce the impacts to your privacy.
- d. If you believe that any personal information we hold about you has been impacted by a data breach, you can Contact Us using the contact details below.

16. Resolving your privacy concerns and complaints – your rights.

- a. If you have a question or complaint about how your personal information is being handled by us, our affiliates or contracted service providers, please contact us first by using the contact details provided below.
- b. We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.
- c. We aim to resolve complaints as quickly as possible.
- d. We strive to resolve complaints within five (5) business days but some complaints may take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.
- e. Under the Privacy Act you may complain to the Office of the Australian Information Commissioner (OAIC) about the way we handle your personal information. Please note the OAIC requires any complaint must first be made to the respondent organisation. The law also allows 30 days for the respondent organisation to deal with the complaint before a person may make a complaint to the OAIC.

17. Contact Us.

You can contact us in the following ways:

- a. online at www.primarymarkets.com – using our secure feedback form to provide feedback, share your suggestions, provide a complaint or compliment;
- b. email us – info@primarymarkets.com; or
- c. write to us – at PO Box R697, Royal Exchange NSW 1225

18. Changes to the Privacy Policy.

We may, from time to time, review and update this Privacy Policy, including considering new laws, regulations, practices and technology. All Personal Information held by us will be governed by our then most recent Privacy Policy as published on our Website at: <http://www.primarymarkets.com>.