



INGOT BROKERS (AUSTRALIA) PTY LTD

Privacy Policy

1st October 2018

Enclosed is a document you must read and understand as it is part of the client agreement between you and Ingot Brokers (Australia) Pty Ltd.

You should obtain your own independent financial advice as to whether Margin Contracts are appropriate for you.

Protecting the privacy and safeguarding the personal and financial information of our clients and Web site visitors is one of our highest priorities and rhymes with our value of customer satisfaction. The following Privacy Policy explains how we collect and protect your information.

Any reference to 'us', 'our', 'we' or 'INGOT Brokers' in this Privacy Policy is a reference to INGOT Brokers (Australia) Pty Ltd (ACN 159895431).

By opening an account or by using our Web site, you give your consent to the collection, use and disclosure of personal information by us as explained in this privacy policy.

Collection of personal information

We collect information required to open an account, to transact business effectively and to safeguard your assets and your privacy. We also make enquiries as to your identity and other personal details as required by law.

The information we collect directly from you includes your name, residential and mailing address, telephone number, e-mail address, bank account details and other information which could be used to identify who you are. We also collect demographic information, including date of birth, education, occupation. We also assess your trading experience, your approximate annual income and approximate net worth to assess your financial position.

How we collect personal information

We collect most of the information directly from you through application forms, your use of our websites or telephone conversations.

We may also collect your personal information from third parties, including credit reference agencies, analytics providers, search information providers and through publicly available sources.

Usage of personal information

We use personal information only as appropriate to provide you quality service and security. For example, we may use the information collected from you to verify your identity and contact information. We may also use this information to establish and set up your trading account, issue an account number and a secure password, maintain your account activity, and contact you with account information. This information helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

Our affiliates and partners

We may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer. We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below. We reserve the right to disclose your personal information to third parties where required by law to regulatory, law enforcement or other government authorities. We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property.

To help us improve our services to you, we may engage another business (which may be located overseas) 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 analyze 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. All third parties with which we share personal information are required to protect personal information in a manner similar to the way we protect personal information.

Your rights

You have choices regarding our use and disclosure of your Personal Data. If you choose not to provide the information however, we may not be able to open your trading account or provide you with the product or service you have requested.

Your rights are as follows in respect of the personal information we hold about you:

- The right to be informed about processing of your personal data;
- The right to request access to a copy of your personal data and information about how we process it. Please make all requests for emailing customerservice@ingotbrokers.com;

- The right to have your personal data corrected if its inaccurate and to have incomplete personal data completed;
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- The right to have your personal data erased (the “right” to be forgotten”);
- The right to move, copy or transfer your personal data (“data portability”).

Please note that some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

Being a financial services provider, we shall keep a part of your personal information to comply with Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and other applicable legislation. Your request to erase your personal information would not affect such part of the personal information.

The security and storage of your information

We take our obligations to protect your personal information very seriously and as such we take reasonable steps to hold information securely.

Personal information collected by INGOT Brokers may be stored and processed in your region or in any other country where we or our affiliates or service providers maintain facilities. The storage location(s) are chosen in order to operate efficiently, to improve performance, and to create redundancies in order to protect the information in the event of an outage or other problem.

Dealing with INGOT Brokers online

Your account information is password protected and we recommend you do not divulge your password to anyone. To further protect your personal information, your log-in time will automatically expire after a certain period of inactivity. INGOT Brokers cannot guarantee or accept responsibility for the privacy practices or the content of websites to which we provide links.

Restriction of responsibility

We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded Web site or to a linked Web site, you may be asked to provide registration or other information. If at any time you choose to purchase a product or

service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Policy.

Please note that the information you are providing is going to a third party and you should familiarize yourself with the privacy policy provided by that third party.

Use of (cookies)

We use cookies to assist us in securing your trading activities and to enhance the performance of our Web site. (Cookies are small text files sent from the Web server to your computer.) Cookies used by us do not contain any personal information nor do they contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on. We may share Web site usage information about visitors to the Web site 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've visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable. To administer and improve our Web site, we may use a third party to track and analyze usage and statistical volume information, including page requests, form requests, and click paths. The third party may use cookies to track behavior and may set cookies on behalf of us. These cookies do not contain any personally identifiable information.

Direct Marketing

We may use your personal information to offer you products and services that we believe may interest you. If you do not wish to receive marketing offers from us, you can let us know by emailing us at customerservice@ingotbrokers.com. We do not provide your personal information to other organizations for the purposes of direct marketing.

Communications

Unless otherwise indicated for a service, any communications or material of any kind that you e-mail or otherwise transmit through the services, including information, data, questions, comments or suggestions (your Communications) will be treated as non-proprietary and non-confidential. By accepting this Agreement, you grant a license to us to use your Communications in any way we think fit, either on the Web site or elsewhere, with no liability or obligation to you. We are free to use any idea, concept, know-how or technique or information contained in your Communications for any purpose including, but not limited to, developing and marketing products. We are entitled, but not obligated, to review or retain your Communications. We may

monitor your Communications to evaluate the quality of service you receive, your compliance with this Agreement, the security of the Web site, or for other reasons. You agree that such monitoring activities will not entitle you to any cause of action or other right with respect to the way we monitor your Communications. In no event we will be liable for any costs, damages, expenses or any other liabilities incurred by you as a result of our monitoring activities. Keeping information accurate and up to date We take all reasonable steps to ensure that all information we hold is as accurate as is possible. You can contact us at any time and ask for its correction if you feel the information, we have about you is inaccurate or incomplete. The information is provided in good faith and has been derived from sources believed to be reliable and accurate at the date indicated. INGOT Brokers, its related bodies corporate or the directors or officers of those entities do not make any representation or warranty of reliability, completeness, fitness for purpose or accuracy of the information or any third-party website linked to this Website. If you use the information, you do so at your own risk, and you should consult INGOT Brokers as to whether more recent information is available which will affect your decision.

Changes to this Privacy Policy

From time to time, we may update this Privacy Policy. In the event we materially change this Privacy Policy, the revised Privacy Policy will promptly be posted to the Web sites and we will post a notice on our Web sites informing you of such changes. You agree to accept posting of a revised Privacy Policy electronically on the Web site as actual notice to you. Any dispute over our Privacy Policy is subject to this notice and our Customer Agreement. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. If you have any questions that this policy does not address, please contact at customerservice@ingotbrokers.com.