

## Privacy Policy

MerchantFX Pty Ltd

A.B.N. 13 610 010 743

CAR 1241758 of AFSL 226199

### PRIVACY POLICY

#### The information we collect

Personal information is collected for the purpose of developing and establishing a financial services relationship with you. The information we collect from you will only be the essential information needed for us to effectively perform our services and duties to you. Without your personal details we may not be able to supply these services. The Corporations Act and general law require that when an investment adviser provides an investment recommendation he or she must have reasonable grounds for making that recommendation. This means the investment adviser must conduct an appropriate investigation of your financial situation and your particular needs and objectives. Any information requested by your financial adviser is necessary to enable them to make recommendations on a reasonable basis and will be used for that purpose. We will not collect, use or disclose any personal information from you revealing racial or ethnic origin, political opinions, memberships of a political association, religious beliefs or affiliations, philosophical beliefs, memberships of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information unless:

- you have given express consent to MerchantFX Pty Ltd ("MerchantFX") to do so;
- there are reasonable grounds to believe that disclosure is necessary to prevent a threat to life or death;
- the use is authorised by law or reasonably necessary to enforce the law; or
- the information is necessary for the establishment, exercise or defence of a legal claim.

#### How we collect information

MerchantFX collects your personal information through a variety of ways. This includes, information that you provide to us during meetings, information that you provide to us when you complete application forms, information that you provide to us over the telephone or internet, and information that you provide to us through a third party, such as your financial planner or adviser, accountant or lawyer.

#### Use and disclosure of your information

The information we collect from you is strictly confidential for use by MerchantFX. MerchantFX will not reveal, disclose, sell, distribute, rent, licence, share or pass that information on to any third parties, other than: where you have consented to the disclosure; to service providers contracted to MerchantFX under strict confidentiality clauses; or other market operators, clearers and product operators for the purpose, giving effect to your instructions. Disclosure to service providers may be necessary for the provision of our services to you. MerchantFX may use your personal information for marketing purposes. If you wish to remove your name from our marketing mailing list please contact us on +61 3 8393 1800 or write to us at the address: Level 11, 356 Collins Street, Melbourne, VIC, 3000, Australia

If we wish to use any of your personal information for any other purpose than those specified in this Policy, we will not do so without your express consent. Exceptions to this include:

- where there are reasonable grounds to believe that disclosure is necessary to prevent a threat to life or health;
- where MerchantFX suspects that an unlawful activity is or has been engaged in;
- the use is authorised by law or reasonably necessary to enforce the law; or- in legal or dispute proceedings.

We will take reasonable steps to ensure that all information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment that is accessible only by authorised personnel. Please assist us to keep your details up-to-date and advise us if any information appears inaccurate.

If you cease to be a client of MerchantFX, we may keep our records about you, including your personal information, for approximately seven years in order to comply with the legislative requirements. After that, we may destroy those records.

If we do not agree that your personal information requires correcting, we must (if you request) take reasonable steps to ensure that whenever your personal information is later accessed or handled, it is not apparent that you are not satisfied as to the accuracy or completeness of that information.

#### Access to your personal information

You may access at any time any personal information that MerchantFX holds about you. Exceptions to this include:

- where providing access will pose a serious threat to life or health of any individual or pose an unreasonable impact on the privacy of an individual;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice our position in those negotiations;
- where the information relates to existing legal proceedings between MerchantFX and you and the information would not be discoverable in the process of those legal proceedings; or
- where providing access would be unlawful, may prejudice an investigation of possible unlawful activity, may prejudice enforcement of laws, or denying access is specifically authorised by law.

If MerchantFX does not allow you access to your personal information, we will provide you with reasons for our decision.

To access information that is held about you please contact the Compliance Officer. MerchantFX Compliance Officer may be contacted 9am-5pm Monday – Friday on +61 3 8393 1800 except public holidays or via email on [info@merchantfx.com.au](mailto:info@merchantfx.com.au)