



EncoreFX (Australia) Pty Ltd ACN 607 244 879

Privacy Policy

1 Overview

EncoreFX (Australia) Pty Ltd ACN 607 244 879 (**EncoreFX**) is committed to the protection of the privacy of the people we deal with and we seek to uphold high standards of privacy practice and security. This policy explains how we handle personal information.

Whenever we handle personal information, we seek to ensure that appropriate standards of privacy practice and security are applied.

This policy sets out why we need to collect personal information, how we collect it, what we do with it, how it is stored and who we might share it with. The policy also describes how you can access or correct information we hold about you, how you can ask further questions or make a complaint. We will update this privacy policy when our information handling practices change. Updates will be published on our website and through our email lists.

2 Collection of personal information

For most products and services, it is necessary for us to collect 'personal information' such as your name, identity details, contact details, transaction information and other personal details where needed (such as your tax file number and financial information).

3 Sensitive information

Generally, we do not collect sensitive information about you unless required by law or where you consent for us to do so (only where it is relevant to your product). Sensitive information includes information relating to race, political or religious beliefs, sexual preferences, criminal history and association memberships. We may collect information about your affiliation with certain organisations, such as professional associations.

4 Purpose for collecting personal information

We collect personal information about you which is reasonably necessary to:

- (a) provide you with quality products or services;
- (b) consider applications and approaches you make to us;
- (c) conduct marketing;
- (d) maintain your contact details; and
- (e) fulfil our legal obligations, such as those relating to taxation and anti-money laundering and counter-terrorism financing;

or as otherwise authorised by you.

Without such information, we may not be able to process your application or provide you with an appropriate level of service.

5 Procedure for collecting personal information

We collect personal information about you directly from you – this can be in person, in documents you give us, from telephone calls, emails, your access to our website or from transactions you undertake with us.

We may also collect your personal information from third parties including public sources, your adviser(s), agents, referrers, brokers, our related companies and service providers (including credit reporting bodies and information service providers).

6 Storage of personal information

We keep personal information in physical and electronic records, at our premises and the premises of our service providers, which may include storage on the cloud. Where this occurs, we take steps to protect personal information against misuse or loss.

We also keep records of our interactions with you (including by telephone, email and online), your transaction history and your enquiries or complaints.

7 Use of personal information

We use personal information about you for the purpose for which it was provided to us, including to:

- (a) process applications for foreign currency exchange transactions;
- (b) administer and manage our products and services (including monitoring, auditing, and evaluating those products and services); and
- (c) communicate with you and deal with or investigate any complaints or enquiries.

We may also use your personal information for related purposes which would reasonably be expected without your permission. For example, we may from time to time use your personal information to provide information about products and services which we expect may be of interest to you. However, if you don't want to receive such communications you can tell us by using any of the methods listed below.

While we may sometimes share personal information with companies we do business with (e.g. in foreign currency exchange and over-the-counter derivative transaction arrangements), we do not sell personal information for marketing purposes to other organisations or allow such companies to do this.

8 Disclosure of personal information

8.1 Disclosure of information within or outside the EncoreFX Group

We may share personal information within the EncoreFX Group. The EncoreFX Group is made up of EncoreFX (Australia) Pty Ltd and its parent company EncoreFX Inc., a Canadian-based foreign exchange dealer and non-cash payment provider.

We may also disclose personal information outside the EncoreFX Group:

- (a) as required by law or regulations, such as those relating to anti-money laundering and counter-terrorism financing or as required by a regulator;
- (b) to our service providers, who provide services in connection with our products and services (including auditing, accounting, legal, mailing, marketing, insurance, identity verification, website and technology services);
- (c) to your nominated financial adviser with your permission; and
- (d) as contained in the terms and conditions of our product or service.

8.2 Disclosure of information to other countries

In some circumstances the parties to whom we disclose personal information may operate outside of Australia. Personal information may be disclosed to EncoreFX Group entities and third parties in Australia and Canada.

Where this occurs, we take steps to protect personal information against misuse or loss.

9 Keeping information accurate and up to date

We take reasonable steps to ensure that all information we hold is as accurate as is possible. You are able to contact us at any time and ask for its correction if you feel the information we have about you is inaccurate or incomplete.

10 Keeping information secure

We use security procedures and technology to protect the information we hold. Access to and use of personal information within EncoreFX seeks to prevent misuse or unlawful disclosure of the information – this includes internal policies, training and monitoring of staff.

If other organisations provide support services, we require them to appropriately safeguard the privacy of the information provided to them.

Where the personal information we collect is no longer required, we delete the information or permanently de-identify it in accordance with relevant laws.

11 Accessing or correcting personal information

You can contact us to request access to or correction of your personal information. In normal circumstances we will give you full access or make the requested corrections to your information. However, there may be some legal or administrative reasons to deny these requests. If your request is denied, we will provide you with the reason why (if we can). Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction with the information.

12 Dealing with EncoreFX online

When you visit the EncoreFX website you will browse anonymously unless you have logged into a client portal or accessed the website from a personalised communication from EncoreFX.

For all visitors to our web site, we use cookies to collect anonymous information such as the server your computer is logged on to, your browser type (for example, Internet Explorer, Chrome or Firefox), and your IP address. (An IP address is a number that is assigned to your computer automatically and required for using the Internet). We may also derive the location associated with an IP address.

Once you have logged into an EncoreFX portal, accessed our website from an e-mail or other personalised communication sent to you, or provided us with personal information by completing a form online, we may be able to identify you and we may combine that with other information in order to provide you with a better online experience. If you would prefer not to be identified, you can delete the cookies and reconfigure the cookie preferences on your internet browser (see below).

13 Cookies

A 'cookie' is a packet of information placed on a user's computer by a website for record keeping purposes. While cookies are not considered personal information, they are generally used on EncoreFX's website to:

- (a) access online services - if you log into our secure areas on our website we will use cookies to authorise your access and save your preferences;
- (b) manage advertising - when you see one of our ads on a third party website, cookies are sometimes used to collect anonymous information about the page you visit and the type of software you are using;
- (c) monitor traffic - we use anonymous information to track how people are using the EncoreFX site. This may include time of visit, pages visited and some system information about the type of computer you are using; and
- (d) monitor your use of our website - if we have identified you as a result of you logging into an EncoreFX client portal, accessing our website from a personalised communication or providing us with personal information by completing a form online, we may use cookies to collect personal information about you.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. (Each browser is different, so check the Help menu of your browser to learn how to change your cookie preferences).

If you disable the use of cookies on your web browser or remove or reject specific cookies from the EncoreFX website or linked sites, then you may not be able to gain access to all of the content and facilities on those websites.

14 **Contact us**

If you have any questions or complaints regarding privacy or information handling, please write to complianceau@encorefx.com or contact us by telephone on 1800 874 942. Please mark communications to the attention of our Privacy Officer. We will respond to let you know who will be handling your matter and when you can expect a further response.

If your concerns are not resolved to your satisfaction, you may be able to lodge your complaint with the Financial Ombudsman Service (details below) which is an external dispute resolution service of which we are a member:

Financial Ombudsman Service Limited

Telephone: 1800 367 287

Email: privacy@fos.org.au

Facsimile: 03 9613 6399

Website: www.fos.org.au

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