

# AxiForex Pty Ltd & AxiCorp Financial Services

## **PRIVACY STATEMENT**

AxiForex Pty Ltd is a Corporate Authorised Representative (Rep No. 001253785) of AxiCorp Financial Services Pty Ltd AFSL 318232. AxiCorp Financial Services Pty Ltd (ACN 127 606 348) (AxiCorp) Respects Each Individual's Right to Privacy. AxiCorp realise how important it is for us to safeguard any personal data that may reveal your identity or account information, whether you are our client or a visitor to our Website's public domain. AxiForex forms part of the AxiCorp Group of entities (the AxiCorp Group). References to "we", "us" and "our" in this Privacy Statement are references to AxiCorp.

### **Your Privacy is Our Priority**

AxiForex is committed to its privacy obligations under the Australian Privacy Principles contained in the Privacy Act 1988. This Privacy Policy describes how we handle, use, disclose and protect personal information we collect about individuals who apply for or receive our products and services. A copy of the Privacy Principles can be obtained from [www.privacy.gov.au](http://www.privacy.gov.au).

This Policy sets out how we manage your personal information. In particular, this Policy describes:

Why we collect personal information;

- A. The types of personal information we collect;
- B. How we handle personal information;
- C. Who we may disclose personal information to; (Sharing Information with Our Affiliates & Non-Affiliated Third Parties and Regulatory Bodies)
- D. Access to your personal information;
- E. Choosing not to provide personal information;
- F. How to contact us.

### **What is Personal Information? Why We Collect Personal Information?**

The main reason we collect, hold, use and disclose personal information is for business purposes, such as evaluating your application to open account, processing your requests and transactions, informing you about products and services that may be of interest to you, and providing client service.

Personal information includes any information or opinion, about an identified living individual or an individual who can be reasonably be identified from their information. The information or opinion will still be personal data whether it is true or not and whether it is recorded in a material form or not.

We may collect, use and disclose personal information about you, including information you may voluntarily disclose to us in any manner, so that we can (i) carry out our obligations with respect to the services that we provide; (ii) carry out our everyday business activities and dealings with you; (iii) compile statistical analysis of the pages of the website visited; (iv) monitor and analyse our business; (v) participate in crime prevention, legal and regulatory compliance, including screening and comparing such data against sanctions and other databases used for crime prevention purposes; (vi) market and develop other products and services; (vii) transfer any of our rights or obligations in relation to the services that we offer; and (viii) process your personal information for other related purposes. If you do not provide us with your personal information, or if you provide us with inaccurate or incomplete information, we may not be able to provide you with our services, including giving you access to our services.

### **What Kinds of Personal Information Do We Collect?**

When you apply for or maintain an account with AxiForex, we collect and maintain personal information about you. The personal information we collect about you may include:

- Information you provide to us on applications and other forms, such as your name, address, date of birth, occupation, employer, assets and income, telephone or mobile number, email address and bank account details;
- Information about your transactions in financial products;
- Information we receive from other entities not affiliated with AxiForex; and
- Information you provide to us to verify your identity, such as a passport, or information and documents received from other entities not affiliated with AxiForex.

## **Sensitive Information**

Sensitive information is defined in the Privacy Act. AxiForex will not collect sensitive information about you without your prior consent, unless: required by law; necessary to prevent or lessen a serious and imminent threat; or necessary for the establishment, exercise or defence of a legal or equitable claim.

## **How We Collect Personal Information**

We collect personal information directly from you. We may also collect information from you electronically, for instance when you visit our website.

We may also collect personal information about you from other people, for instance AxiForex affiliates or divisions.

Unless it is not reasonable and practicable to do so, AxiCorp will only collect your personal information from you. In certain circumstances, however, AxiCorp may collect personal information from third parties, including publicly available sources of information and other organisations within the AxiCorp Group.

## **About Cookies**

AxiForex collects the information from you electronically when you visit our websites, including date and time of visit, number of pages viewed, how you navigate through our Websites.

Cookies are small files containing information that a website uses to track its visitors. AxiForex may set and access AxiForex cookies on your computer, enabling us to learn which advertisements and promotions bring users to our website. AxiForex or any of its affiliates or divisions may use such cookies.

AxiForex uses cookies to capture data to help us improve the service offered and to make improvements in relation to the quality of content contained on our Websites.

## **How We Protect Personal Information**

Personal information collected by AxiCorp is handled in accordance with the Privacy Principles.

Personal information collected by AxiCorp will be used and/or disclosed only for the primary purpose for which it was collected, or for a secondary purpose in accordance with the Privacy Principles, for example:

With your consent; Where the use or disclosure falls within an exception sets out in the Privacy Principle 6 such as where we reasonably believe that your information is reasonably necessary for one more enforcement related activities of an enforcement body; or Where it is related to the primary purpose of collection and you would reasonably expect AxiCorp to use or disclose the information for that secondary purpose.

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure. We restrict access to your personal information to those employees who need to know in order to conduct our business, service your account and provide you with a broad range of products and services. Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so. We maintain physical, electronic and procedural safeguards to protect your personal information.

### **Storage and Security of Information, AxiForex Security Technology**

Your personal information may be stored by AxiCorp electronically or in hardcopy. AxiCorp takes reasonable steps to ensure the security of your personal information. AxiCorp takes reasonable steps to protect your personal information from misuse and loss and from unauthorised access, modification or disclosure. Information is protected in a number of ways, including through the maintenance of a secure electronic environment at AxiCorp and by ensuring adherence to internal policies on the protection of information and confidentiality.

AxiCorp will take reasonable steps to destroy or permanently de-identify your personal information if it is no longer needed for any purpose for which use and disclosure is permitted.

AxiForex may use GeoTrust Secure Socket Layer (SSL) encryption technology in order to protect the information that you submit to us. This type of technology is designed to protect you from having your information intercepted by anyone other than AxiForex while it is being transmitted to us. We also use other

safeguards such as firewalls, authentication systems (e.g., passwords and personal identification numbers) and access control mechanisms to control unauthorised access to systems and data. However, you acknowledge and accept that any services provided through the website involve transmissions over the internet and that such transmissions are therefore subject to the internet's inherent risks. Whilst we acknowledge our responsibility to take reasonable security precautions, you also acknowledge and accept that, as with any network, you may also be exposed to unauthorised programs transmitted by third parties, electronic trespassing and/or the failure of information and data to reach their intended destinations and/or erroneous receipt or misdirection of such information. Although our and our suppliers' privacy and security features are designed to reduce these risks, we cannot guarantee that the risk can be eliminated completely. You therefore acknowledge that we will not be liable for any breach of confidence or unauthorised access and use arising as a result of such event.

### **Who We Disclose Personal Information To? Sharing Information with Our Affiliates & Non-Affiliated Third Parties and Regulatory Bodies**

We may be required to may share personal information described above to other entities within the AxiCorp Group or to local or overseas third parties in connection with our service or business operations, such as dealers, other brokers or advisors.for example, to enable them to provide various support services to AxiCorp as permitted by applicable law. This may also include:

- Financial service institutions (advisors, dealers, brokers and banks) with whom we have joint marketing agreements, such as agreements to market financial services or products that we jointly offer, endorse or sponsor; and
- Companies under contract to perform services for us or on our behalf, such as service providers that prepare statements and transaction confirmations or provide data processing, computer software maintenance and development, transaction processing and marketing services.
- Professional service firms that provide services to us such as legal, and audit services.

In certain circumstances, AxiCorp may also be required to disclose your personal information where required by law or on request by an enforcement body from time to time in Australia and overseas in relation to an enforcement related activity.

- If you consent to the cross border disclosure after we inform you that the consequence of giving your consent is that the requirement in the Australian Privacy Principle 8.1 will not apply.

Australian Privacy Principle 8.1 provides that where personal information of an individual is disclosed overseas to a person other than the disclosing entity or the individual who is the subject of the information, the disclosing entity must take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach Australian Privacy Principles in relation to the information. An exception to this requirement set out in APP 8.1 is where an individual consents to the cross border disclosure after being informed by the disclosing entity that if the individual consents to such disclosure of the information, the requirement in APP 8.1 will not apply.

In some circumstances the parties to whom we disclose personal information may operate outside of Australia – this includes locations in the countries listed in the Appendix. Where this occurs, we take steps to protect personal information against misuse or loss.

### **About Hyperlinks**

AxiForex's websites may contain hyperlinks or "links" to other sites, and other sites may "link" to our sites. These websites that may be linking to or from AxiForex's sites may have their own privacy policies. AxiForex's privacy policy applies exclusively to AxiForex and information collected by us. AxiForex is not responsible for the privacy policies or the content of the sites you link to, nor do we have control over the use or security of information provided by you or collected by those sites. If you choose to link to one of these websites, you may be asked to supply registration or other information. It is important that you realise this information is going to a third-party, and you should become familiar with the privacy policy provided by that third-party.

### **Direct Marketing**

We may use your personal information to offer you products and services that we believe may interest you. We will not do this if you tell us not to. AxiCorp will not provide your information to non-AxiCorp Group entities for marketing purposes.

If you do not wish to receive marketing offers from us, please send an email to us at [AxiForex-Australian\\_Staff@AxiForex.com](mailto:AxiForex-Australian_Staff@AxiForex.com)

## **Accessing and Updating Your Personal Information**

You have certain rights of access to some or all of the personal information we collect and hold about you at the time of request, or to have inaccurate information corrected. If you wish to exercise such rights, you should contact us using the details below. You may be requested to provide further information to assist us in complying with such request. There is no fee for requesting that your personal information is corrected, however in processing your request, our reasonable costs may be recovered. This covers such things as locating the information and supplying it to you.

Where we refuse to action 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.

If we refuse your request to access or correct your personal data, we will also provide you with information on how you can complain about the refusal.

## **Choosing not to provide your personal information to us**

You may deal with us anonymously where it is permitted by law and practicable. However, if you choose not to provide part or all of the personal information required by AxiForex, it may affect the ability of AxiForex to manage your relationship and/or the Client's relationship with AxiForex and to provide financial services to the Client.

## **How To Contact Us**

If you would like more information about how we manage your personal information or if you wish to change your contact information, please contact us or write to us, at the following contact details:

Privacy Officer  
AxiCorp Financial Services Pty Ltd  
PO Box 1079  
North Sydney, NSW 2059  
+61 2 9965 5806

[compliance@axicorp.com](mailto:compliance@axicorp.com)

## **Complaints about Your Privacy**

If you have any concerns about any breach or potential breach of your privacy, please contact our Privacy Officer in writing via post or email at the above address. We will make every effort to resolve your complaint internally and as soon as practicable and in any event within 30 days from receipt of your complaint.

If you are not satisfied with our response, you may then contact the Financial Ombudsman Service (FOS). FOS can consider most privacy complaints involving providers of financial services. FOS contact details are as follow:

Financial Ombudsman Service  
GPO Box 3  
Melbourne VIC 3001

Phone: 1300 78 08 08  
[www.fos.org.au](http://www.fos.org.au)

If you feel that your complaint has not been resolved to your satisfaction, you may then take your complaint to the Office of the Australian Information Commissioner (OAIC). For more information on how you may lodge a complaint with OAIC, please contact the OAIC on 1300 363 992 or email [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001  
Phone: 1300 363 992

## **Appendix - Disclosure to other countries**

Personal information may be disclosed to AxiCorp entities and third parties in jurisdictions including: Australia; China; Germany; Hong Kong; New Zealand; Moldova; Saudi Arabia; Singapore; Spain; United Arab Emirates; United Kingdom; United States of America.