www.tradehallgroup.co

TRADEHALL

Privacy Policy



1. YOUR PRIVACY

1.1 TradeHall respects the confidentiality of information and personal privacy. This privacy policy outlines how TradeHall manages, processes and protects the personal information and data it holds about you, including the information and data that TradeHall collects in the course of providing products and services to you and what TradeHall holds after the relationship is terminated Information and data, and comply with the Privacy Act 1988 (Commonwealth) ('Privacy Act'), the Australian Privacy Principles ('APPs') and the General Data Protection Regulation (EU) 2016/179 ('GDPR'). This privacy policy also applies to information and data collected by TradeHall from third parties, including information and data received by TradeHall through credit reporting agencies or institutions.

1.2 This privacy policy contains information about how you can access and control the information about you held by TradeHall, how to ask TradeHall to correct your information, and if you have questions about how TradeHall manages your information.

1.3 This Privacy Policy covers TradeHall Pty Ltd, whose registered address is 5 Calcetto PL Arundel Qld, 4214 New South Wales. Unless otherwise stated, any reference to "we", "us", "us", "it" or "TradeHall" in this privacy policy refers to a reference to TradeHall Pty Ltd. Likewise, any reference to 'you', 'your', 'yours' or 'yourself' in this Privacy Policy is a reference to any of TradeHall's customers, potential customers, shareholders and others, as the context requires unless otherwise stated.

1.4 This Privacy Policy will be reviewed from time to time to consider new laws and technologies, changes to TradeHall's operations and practices, and to ensure that it still applies to changing environments. Any information we hold is subject to the latest privacy policy displayed on our company website. In addition, in the process of establishing a relationship with you, we may tell you more about how we process your information. It may be when you fill out an application form or form, or receive important disclosure documents from us, such as terms and conditions or Product Disclosure Statements. You should also review these statements, as they may have more specific details.

2. COLLECT YOUR PERSONAL INFORMATION

2.1 We collect personal information and data about you in order to effectively perform various functions and activities. If we do not collect your personal information, we may not be able to deal with you or provide you with products or services. Due to the nature of the products and services we provide and our related regulatory obligations, we cannot choose to let you deal with us in an "anonymous" manner. If the law requires us to collect your personal information, we will also collect your personal information.

2.2 We will obtain most of the information directly from you through application or other forms, and we can also obtain most of the information by maintaining a record of the information provided during the ongoing customer service process. For example, when you open a trading account with us, fill out an application form, contact us by phone, send us an email or use our website, you need to provide us with your personal information.

2.3 We may collect and retain your personal information when you apply for a product or service of TradeHall, information including (but not limited to) your name, address, contact number, email address, tax file number (TFN), date of birth, annual income and other financial details, employment details, credit history and your transaction history.

3. COLLECTING INFORMATION FROM THIRD-PARTIES

3.1 There may be occasions when we may collect personal information about you from third parties. We may collect publicly available personal information about you, including information from telephone directories, the electoral roll or other relevant websites. For example, we may collect personal information about you from the following locations:

- credit reporting agencies and/or other credit providers – collect information about the products they provide to you and your credit history;
- the organizations we have a cooperative relationship with provide products together;
- marketing companies – collect information about you so that we can provide you with products or services that may be of interest to you; and
- brokers and/or other related entities who may have introduced you to us.

3.2 We may also collect information and data about how you use our website and/or other websites to help us better tailor our services to you. For example, when you click on a link on our website or visit an external website that displays TradeHall advertisements, or when you log in to our online portal or service, we may perform this action automatically (for more information, see "Use cookies and other content tracking technologies"). Any disclosure and/or processing of this information will comply with this privacy policy.

4. COLLECTING SENSITIVE INFORMATION

4.1 In this privacy policy, "sensitive information" refers to a person's race or ethnic origin, political opinions, political association members, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, genetic information or health information.

4.2 Unless we need to provide information for one of our functions or activities (or legally require us to do so), and we have obtained your consent, we will NOT COLLECT, use or disclose sensitive information about you.

4.3 If you provide us with personal information that we have not requested, then we will only retain the information that we are entitled to because of the products and services we provide. However, if this additional information exceeds our requirements, but is provided to us in a way that is combined with the information we need or have the right to retain, you acknowledge that we may retain this unsolicited information in the same way as you the balance of personal information.

5. COLLECTING INFORMATION REQUIRED BY LAW

5.1 We may collect personal information about you because Australian laws, courts or court orders require or authorize us to collect this information. If the law requires or authorizes collection, we will notify you and provide you with detailed information about the law, court or court order.

5.2 For example, when you set up a trading account with us and make a fund deposit, we are required to collect certain information from you to prove your identity (i.e. your driver's licence or passport) under the Anti-Money Laundering and CounterTerrorism Financing Act. In limited circumstances, we may collect information about you in order to verify your identity prior to your entry into an agreement with us. We may also collect your Tax File Number ('TFN'). We will only collect your TFN to determine whether you are subject to withholding tax on any payments you receive and for no other purpose. If we collect your TFN, we will handle your TFN in accordance with the Privacy Act and the TFN Rule issued by the Commissioner.

5.3 Similarly, according to the tax information sharing agreements signed by the Australian government with other countries/regions, we may need to inquire about your tax residency status. For example, a tax treaty between Australia and the United States formed under US law (Foreign Account Tax Compliance Act) requires us to ask you whether you are a US citizen or US resident for tax purposes when you apply for a trading account. If you are a tax resident of another country, the relevant treaty or law may require us to collect your relevant foreign tax identification number.

6. USING YOUR PERSONAL INFORMATION

6.1 We may use the personal information we collect about you when we have a legal basis to fulfill the information necessary for the obligations arising from the agreement between you and TradeHall, or when it is in our legitimate interests

6.2 We may use your personal information for several purposes including:

- consider your requirements for products or services;
- to enable us to provide a product or service;
- to introduce you to other products and services that may be of interest to you;
- to assist in arranging promotion or provision of related products or services with other organizations;
- to manage accounts or perform other administrative and operational tasks (including risk management, systems development and testing, credit scoring and staff training, collecting debts and market or customer satisfaction research);
- to consider any concerns or complaints you raise against TradeHall and/or to manage any legal action between you and TradeHall;
- to prevent or investigate any actual or suspended fraud, unlawful activity or misconduct;
- to identify you or establish your tax status under any Australian or foreign legislation, regulation or treaty pursuant to an agreement with any tax authority; and
- as required by relevant laws, regulations, codes of practice and external payment systems.

6.3 As part of our services to you, we may use the personal information collected about you to introduce you about products and services or promotions and other opportunities that you may be interested in.

6.4 We may contact you from time to time to let you know about new or existing products or services. We may also disclose your personal information to relevant entities or business partners so that they can introduce products or services to you. Depending on the situation and these activities are not generated out of our legitimate interests, you need your consent to our activities.

6.5 If you do not wish to receive such communications, you can contact Tradehall at any time. Please note that we will not use any information about you received through the credit reporting system for marketing purposes.

7. SHARING YOUR PERSONAL INFORMATION

7.1 According to related products or services and specific restrictions on sensitive information, when necessary, we may need to share or disclose your personal information with the following organizations:

- any related entities of TradeHall in Australia and elsewhere in the world which provide financial and other services for TradeHall;
- we have contracted to provide service providers and professional consultants for TradeHall with administrative, financial, taxation, insurance, research or other services;
- credit reporting or reference agencies;
- if you are introduced to TradeHall by a third party, we may disclose your personal and account information to them, their affiliates, licensees or authorized representatives;
- credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law; and
- anyone authorised by an individual, as specified by that individual or the contract.

7.2 If there is disclosure of your personal information to an organisation not listed above, we will first obtain your free and informed consent. In some circumstances, the nature of the product or service you request may require us to disclose your information overseas and the countries to which we may disclose your information will depend on your particular circumstances.

7.3 When we disclose your information (including cross-border disclosure), we must take steps to ensure that your information has been processed in accordance with applicable Australian standards and data regulations (where applicable). The foregoing standards apply to our disclosure of your personal information. Unless in rare circumstances, we have legally obtained your free and informed consent, otherwise we will not take these measures or require it to do so.

7.4 Please keep in mind that our ability to enforce APP or any other contractual privacy obligations for overseas recipients and to take action against any violations may be very limited, and/or far less effective than such recipients from Australia. Since these apps may not be applicable to or enforceable for certain overseas recipients, we understand that you can choose not to disclose your personal information. However, if you choose not to provide the information required to meet the requirements of a particular product or service, we may not be able to provide you with the required product or service.

8. GET YOUR CONSENT

8.1 We may need your consent to use and/or disclose personal information about you in a specific way. For example, if we need to use your information for a purpose unrelated to the purpose for which we originally collected your information, your further consent is required.

8.2 Depending on your situation, consent may be explicit (for example, you expressly agree to the specific use of your information by ticking a box) or implied by some action you take or do not take (for example, your agreement is implied by the fact that you have agreed to your product terms and conditions which contains information about the use or disclosure).

8.3 According to the General Data Protection Regulation, you have the right to object to our processing of your personal data, and you can withdraw that consent at any time if we have obtained your consent to process personal information for certain activities. We will respect these rights unless we consider other legal grounds to justify our continued processing of your personal information for this purpose.

9. USE OF OTHER TRACKING TECHNOLOGY

9.1 Our website has links to external third-party websites, which may benefit you. Please remember that these third-party websites are not protected by this privacy policy, and these websites are not subject to our privacy standards and procedures. We may use independent external service providers to track traffic and usage on our website.

9.2 Please also note that we are constantly improving the features on our website. This may mean changing the way personal information is collected or used. Any technical changes that may affect your privacy will be notified in this Privacy Policy, as it may be updated from time to time.

10. MANAGING YOUR PERSONAL INFORMATION

10.1 TradeHall takes all reasonable precautions to protect your personal information and data from misuse and loss by ensuring that only appropriately authorized persons can access your personal information, as well as to prevent unauthorized access, modification and disclosure.

10.2 We train employees who handle your personal information to respect the confidentiality of customer information and personal privacy. We attach great importance to violations of customer privacy and will impose appropriate fines, including dismissal.

10.3 Your personal information is stored in a combination of secure computer storage facilities and paper files and other records. Regardless of the format of the information, we will take measures to protect our stored personal information from interference, abuse, loss, and unauthorized Access, modify or make public. We maintain physical security on paper, electronic data storage and premises, such as locks and security systems. We also maintain the security of computers and networks. For example, we use firewalls (security measures for the Internet) and other security measures (such as identification codes and passwords) to control access to computer systems. We will continue to maintain and monitor our online security system to ensure the security of our online services, and appropriately protect your personal information when you use these services.

10.4 Your personal information may also be processed by us and/or our third-party service providers (including storage and transfer) outside Australia or the European Economic Area (EEA) i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein. If you are based in the EU, we will only process and/or transfer data where it is compliant with relevant data protection legislation, where the means of transfer provide adequate safeguards in relation to your personal information. For example, by way of a data transfer agreement with a third-party, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by controllers in the EEA to controllers and processors in jurisdictions without adequate data protection laws.

10.5 Please note that we may need to retain your personal information for a considerable period of time. When we are no longer allowed to keep your information, we will delete and/or destroy your personal information accordingly. If you are the subject of applicable data regulations, you have the right to request that we delete certain personal information.

11. PROTECTING YOUR PRIVACY

11.1 You can always understand our security requirements and contact us immediately when your contact information changes to help Tradehall protect your privacy.

11.2 We also require you to keep your personal customer information (such as passwords and user details) confidential and secure at all times. This means that you should not disclose your personal user information to anyone else. If you think that your personal user information may have been leaked to others, or you want to change your password or user details, you should contact TradeHall immediately.

12. ACCESSING YOUR PERSONAL INFORMATION

12.1 According to the Privacy Act and the General Data Protection Regulation (with certain exceptions), you have the right to find out what personal information we hold about you, including information we obtain through the credit reporting system. If you want to know the personal information we hold about you, please contact TradeHall (please note that for security reasons, your request should be made in writing, and we may need to verify your identity before allowing you to access).

12.2 We are generally able to deal with your request immediately. However, if the request is complex, it will be processed within 14 to 30 business days. In addition, depending on the complexity of your request, we may need to charge a fee to cover the verification application and the cost of finding, retrieving, reviewing, and copying any materials requested. If the required information is extensive, we will advise and disclose possible costs in advance, and help you refine your requirements when needed. In order to protect your rights under the General Data Protection Regulation, if you request the transfer of your personal data to a third party, we will usually provide you with your personal data in a commonly used machine-readable format.

13. CORRECTING YOUR PERSONAL INFORMATION

13.1 If you believe that the personal information that TradeHall retains about you is inaccurate, incomplete or out of date due to a change of address and other personal circumstances, you should contact us as soon as possible. We will promptly update any personal information that is inaccurate, incomplete or out-of-date.

13.2 We can update your personal information by phone or by email in your registered email address (please note that we need to confirm your identity before making any changes).

14. EXPRESSING YOUR PRIVACY CONCERN

14.1 If you believe or believe that any of our actions violate this Privacy Policy and/or Privacy Law, the General Data Protection Regulation or any applicable laws, or otherwise disrespect your privacy, you have the right to lodge a complaint. This will take immediate action.

14.2 You may lodge your complaint online on our website(s) or by contacting our Account Manager using the following methods:

- Submit a support ticket on our website
- Email: support@tradehall.co

14.3 If you lodge a complaint, we will strive to respond within 48 working hours to inform you who is responsible for managing your complaint, and will resolve your complaint within 10 working days. If this is not possible, we will contact you during this time to let you know how long it will take to resolve the complaint.

14.4 We will thoroughly investigate your complaint and consult other credit providers or credit reporting agencies about your complaint if necessary, then decide how we will resolve your complaint and write to you to explain our decision.

Get in Touch

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TradeHall Pty Ltd is registered and regulated by the Australian Securities and Investments Commission (Authorised Representative No. 001282038).