

PRIVACY STATEMENT

1. INTRODUCTION

BTIG Australia Limited is committed to safeguarding the Personal Information we collect and use in the course of our business operations.

We achieve this purpose by meeting the standards and requirements set by the *Privacy Act 1988* (Cth) (Privacy Act) and the Australian Privacy Principles (APPs), which regulate the way in which an organisation can collect and deal with an individual's Personal Information (including Sensitive Information), and the measures it must take to safeguard that information. These requirements apply to all of our employees, who are responsible for understanding the privacy aspects of their roles and how we intend to comply with our privacy obligations.

References to 'we', 'us' and 'our' are to BTIG Australia Limited. References to 'you' and 'your' are to you as a recipient of the products and services which we provide.

The purpose of this Statement is to provide open and transparent information to you about the way in which we will manage any Personal Information that we collect and hold during the course of our business dealings with you. In certain circumstances, Personal Information we collect about you may include Sensitive Information. By conducting business with us and/or by electing to provide us with Personal Information, you consent to the collection, holding, use and disclosure of your Personal Information in accordance with the terms of this Privacy Statement ('Statement').

This document is to be utilised as a guide only and the content does not constitute legal advice and should not be relied upon as such. If you need legal advice on a specific matter, please seek independent legal advice.

2. KEY TERMS

Term	Definition
AFSL	means Australian Financial Services Licence.
ASIC	means Australian Securities and Investments Commission.
Breach	means an act or omission which results in an incident of non-compliance of an obligation on the part of a representative of BTIG Australia Limited.
Complaint	means any expression of dissatisfaction made to an organisation, related to its products, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.
Document	means a record of information in any form, including data in computer systems, created or received and maintained by BTIG Australia Limited or its representatives in the conduct of its business and kept as evidence of such activity. It provides objective evidence of activities performed, events occurred, results achieved, or statements made.
Personal Information	means information or an opinion about an identified individual or an individual who is reasonably identifiable and includes an individual's name, signature, address, telephone number, date of birth or bank account detail.
Records	means documents that are created/received by BTIG Australia Limited in routine transaction of its business or in pursuance of its legal obligations. A record may consist of two (2) or more documents.
Sensitive Information	Includes information about the individual's health, political affiliations, union associations, race and ethnic obligations, criminal record and religious or philosophical beliefs.

3. POLICY

What Information do we collect?

We collect information about you to help us provide services to you, offer new products or services, and fulfill legal and/or regulatory requirements. The types of information we collect may include:

- information you provide through our sites or as part of the new account opening process;
- information about your transactions with us or others;
- information you provide regarding marketing data preferences;
- information that we may receive from a third party or publicly available information;
- information we collect automatically through our sites; and
- cookies.

The types of Personal Information that we may collect and hold will include information used to identify you, your financial position and any other related information necessary to provide you with advice, financial products and services. This may include, but is not limited to, your:

- name;
- contact details;
- bank account information;
- tax file number;
- passport or driver's licence;
- nationality;
- business structures;
- employment information;
- source of wealth; and
- investment information.

In addition, we are required to collect and hold Personal Information under the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth) which may include Sensitive Information in certain circumstances.

The Personal Information that you provide will be information that enables us to perform our functions or activities. If you do not provide any of the Personal Information we request or do not consent to the use, holding or disclosure of your Personal Information in accordance with this Statement, we may not be able to provide you with the products or services you require.

How will we collect Information?

The way in which we will collect Personal Information that you provide to us include through BTIG's website and systems, including emails.

In some circumstances, we may gather Personal Information about you from a third party or from publicly available information. The third parties from whom we may acquire Personal Information include:

- information service providers;
- credit agencies;
- financial advisers;
- fund managers; and/ or

- intermediaries and spouses.

Should a third party provide us with your Personal Information, we assume that you have provided your consent for that third party to do so, unless you tell us otherwise. If you have any problems or queries with us obtaining Personal Information about you from a third party, you should contact us and the relevant third party to address your problems or queries.

How will we use your Information?

The purposes for which we will use Personal Information will depend upon the relationship that we have with you and the nature of the services that you require from us. For example, Personal Information may be used to:

- provide you with services in accordance with the terms of our Australian Financial Services Licence (AFSL);
- administer and improve the services we provide to you or our other clients;
- offer you further services (which may include using your information for marketing purposes) – unless you tell us otherwise; and
- comply with our legal and regulatory obligations under the *Corporations Act 2001* (Cth), the *Proceeds of Crime Act 2002* (Cth), the Anti-Money Laundering and Counter Terrorism Financing Act, and the rules of relevant stock exchanges and ASIC.

Storage of Information

Personal Information will only be available to BTIG employees on a need-to-know basis in order to perform their duties.

Access to Information

Should you wish to know what Personal Information we hold about you, you may request to view this Personal Information by contacting us:

BTIG AUSTRALIA LIMITED
15 Lime Street
Suite 513
King Street Wharf Sydney NSW 2000
privacy@btig.com

We will promptly investigate your privacy enquiry and provide appropriate answers where required or permitted. If you discover your Personal and/or Sensitive Information is outdated, incorrect or incomplete, you may request to have the Personal Information corrected. We will promptly update our records accordingly.

You may also contact us if you have any questions on our compliance with the Privacy Act or if you wish to make a complaint about our handling of your Personal Information.

Such complaints should first be made in writing to us, as required by the Privacy Act. We will endeavour to respond to a complaint within 30 calendar days, in keeping with our Complaints and Disputes Resolution Policy & Procedure. If you are not satisfied with our response to a complaint, you may have the right to complain to:

Australian Financial Complaints Authority (AFCA)
GPO Box 3 Melbourne, VIC 3001
Telephone: 1800 931 678
Facsimile: +61 3 9613 6399
Website: <https://www.afca.org.au/>
Email: info@afca.org.au

If you remain dissatisfied with the outcome of the complaint following its determination by the AFCA, you may lodge a complaint with the Office of the Australian Information Commissioner using their Privacy Complaint form on their website (www.oaic.gov.au).

Disclosure of Personal Information

By providing your Personal Information to us, you acknowledge and agree that your Personal Information may be disclosed to any of the following third parties:

- any person for the purposes described in any of our agreements with you, including our strategic partners;
- to our affiliates companies (collectively, “BTIG”), which may be located outside of Australia, and their service providers;
- the issuer or seller of a financial product or its registry provider (or to both), if you have instructed us to acquire the financial product and its terms require us to provide your Personal Information;
- any regulatory, governmental organisation or industry or legal body which governs the conduct of any part of our business in any jurisdiction or as required by law or regulation. Whilst not exhaustive, we may need to disclose Personal Information to regulatory bodies such as ASIC and relevant stock exchanges;
- any financial market, clearing house, settlement facility, lender, credit provider, custodian, share registry or software provider;
- our related bodies corporate whether in Australia or any overseas jurisdiction, including to their officers, employees and professional advisers;
- a third party who is supplying a service to us whether in Australia or any overseas jurisdiction. We may provide Personal Information to third parties including identity verification providers, information technology maintenance companies, software providers and share registries;
- other service providers, which may be located outside of Australia, and which may include, but are not limited to, archival, auditing, accounting, customer relationship management (including Salesforce), legal, business consulting, banking, payment, delivery, data processing, data analysis, information broking, mailing, marketing, research, investigation, insurance, identity verification, brokerage, maintenance, trustee, securitisation, website and technology services;
- any person who acts on your behalf, as applicable, including your financial intermediary, authorised persons, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
- a prospective purchaser of, or investor in (including their agent or third parties providing services relating to the purchase or investment), BTIG Australia Limited or one of our related bodies corporate or a business operated by the same, on a confidential basis;
- any person as necessary to enable us, or our related bodies corporate, to enforce our, or its, rights in, or in relation to any defence from, an actual or potential claim;
- any other person to whom you have authorised us or our related bodies corporate to release Personal Information;
- our strategic partners for the purposes of meeting their obligations under anti-money laundering and counter terrorism financing laws;
- any other third party provided that we obtain your prior written consent; and
- as otherwise permitted by law.

Disclosure of Personal Information to Related Bodies

By providing your Personal Information to us, you acknowledge and agree that this Personal Information may be transferred between related bodies corporate or to third parties who supply products and services to us. These related bodies corporate and third parties to whom Personal Information may be transferred, may be located throughout the world, including in the United States, and may be registered and governed by laws outside the Australian jurisdiction. As such, the laws regulating a related body corporate may differ to Australian laws and may apply a greater or lesser standard of protection for Personal Information.

Should your Personal Information be transferred to a jurisdiction with a lesser standard of privacy protection than Australia, we will take reasonable steps to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under the Privacy Act or APPs. Alternatively, we may seek your consent to the transfer.

BTIG Websites

When you visit BTIG's websites, we automatically collect certain information such as the name of your Internet service provider, the public IP address of the computer or device you are using, the device ID, browsing history, the type of browser software and operating system that you use, the date and time you access this site, the Internet address, if any, from which you linked directly to this site, the Internet address, if any, to which you travel from this site and other similar traffic-related information. This information is mandatory, and we may use the foregoing information internally to help us improve our sites and the services that we provide through them, and we may provide such information to our employees, contractors, agents and designees to the extent necessary to enable them to perform certain site-related services (e.g., web hosting or maintenance services) on our behalf.

BTIG's website utilises cookies and other tracking technologies to collect information about you as you navigate through our sites. Cookies and tracking technologies help us to make interactions with our sites easier and faster for you. We also use cookies and other tracking technologies to analyze trends, administer and improve the services provided through our sites and track activity and interactions with our sites. Other cookies we use are required to secure your connection by checking your identity and securing your access to your account. You can control the use of cookies at the individual browser level. If you reject or delete cookies, you can still use our sites, but your ability to use some features or areas may be limited. Please note that some features and tools on our sites may also be impaired if you block all cookies.

Government Related Identifiers

We may be required to collect Government Related Identifiers (as defined in the APPs) of yours in order to provide a product or service. In particular, we may collect Government Related Identifiers to verify your identity in accordance with the Anti-Money Laundering and Counter Terrorism Financing Act.

Exemptions

This Statement does not apply to any of our acts and practices that are directly related to an employee record of a current or former employee. These are captured in our Human Resource Policies.

Changes to the Statement

We reserve the right, at our discretion, to modify or remove any part of this Statement at any time. You should review this Statement from time to time so that you are updated on any changes.