

Privacy Policy

Protecting the privacy and safeguarding the personal and financial information of our clients and website visitors is one of our highest priorities.

The following Privacy Policy explains how AW Fintech Pty Ltd, ACN 125 839 572, treats your personal information.

By opening an AW Fintech account or by using AW Fintech's websites, you give your consent to the collection and use of personal information by AW Fintech in accordance with this Privacy Policy.

Personal information

"Personal information", as defined in the Privacy Act 1988 (Cth), refers to "information or an opinion, whether true or not, and whether recorded in a material format or not, about an identified individual, or an individual who is reasonably identifiable". Any information or opinion that may lead to the reasonable inference to the identity of an individual may be considered personal information.

We encourage you to check our website regularly for any updates to our Privacy Policy.

Collection of and use of personal information

We collect your personal information for the main purpose of providing you with financial products and services that you request. We collect your personal information to comply with all applicable laws and regulations, such as, but not limited to, anti-money laundering and counter terrorism financing (AML/CTF). We collect your personal information directly from you and indirectly from third parties. AW Fintech may use the information collected from you to verify your identity and contact information, establish your trading account, issue you an account number and a secure password, maintain your account and contact you with account information, among other reasons.

This information also helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

Personal information we typically collect includes the following:

- Name, address, telephone number
- Email address
- Date of birth
- Gender

We may also collect identity verification information, such as copies of government issued identification:

- Driver's license
- Passport
- Social security card
- Benefits card

- National ID card

Furthermore, AW Fintech may collect the following details from you:

- Occupation
- Transaction details associated with your trading through us
- Additional information provided to us and recorded by telephone
- Information you provided to us on client agreement forms
- Financial information (Nominated bank account details, Statement of assets and liabilities, Tax file number, Employer etc.)
- Investment experience
- Company Organisation information and
- Other related information.

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

- Satisfy and comply with all applicable laws and regulations
- Provide you quality products or services
- Consider your applications
- To assist with any calls, you make to us
- To communicate relevant information to you
- For our product development, marketing, planning, administration, and credit control procedures
- Maintain your contact details

The information we collect indirectly from you includes your Internet protocol ("IP") address, browser type, operating system, Internet service provider (ISP), time stamps and transaction history.

Should you close your account with us, AW Fintech will retain your information to the extent required bylaw.

Cookies

We use cookies and web beacons (also known as action tags or single-pixel gifs), and other technologies (collectively, "cookies") to provide us with data we can use to improve your experience and to know you better. Cookies are small text files sent from Web servers that may be stored on your computer. Cookies enable us to capture how you arrived at our site, when you return, which pages on our site you visit, and to recognise that you are already logged on when we receive a page request from your browser. We may link the information we store in cookies to personally identifiable information you submit while on our site.

We may share usage information about visitors to our websites with reputable advertising companies for the purpose of targeting our Internet banner advertisements. The information collected by the advertising company by these pixel tags is not personally identifiable. We may also use third party software to track and analyse usage and volume statistical information including page requests, form requests and click paths. The third party may use cookies to track behaviour and may set cookies on behalf of AW Fintech.

All web browsers have settings that allow you to block cookies. By visiting our website with your browser set to allow cookies, you consent to our use of cookies as described above. If you choose to block cookies you may use our services, but some functions may not work as designed.

Sharing personal information with AW Fintech affiliates and non-affiliated third parties

AW Fintech does not sell, license, lease or otherwise disclose your personal information to any affiliate or third party for any reason, except as described below.

AW Fintech may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer.

To help us improve our services to you, we may engage another business to help us carry out certain internal functions, such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a non-affiliated third party with client information from our database, including your name, address, phone number, and/or e-mail address, to help us analyse and identify client needs, notify clients of product and service offerings or conduct general marketing and market research for us.

AW Fintech also forges partnerships and alliances with non-affiliated third parties which offer high-quality products and services that might be of value to our clients. To ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, AW Fintech may share some personal information with these non-affiliated third parties.

We generally require that all non-affiliated third parties to which we provide your non-public personal information agree to keep your information confidential and use such information solely for the limited purpose for which we have engaged them, or as otherwise required by law. In addition, where offers are made to you by non-affiliated third parties, we generally require that they disclose that the offer is being extended because of your relationship with us. We also seek to ensure that these non-affiliated third parties maintain appropriate data security procedures to guard against unauthorised use of, or access to, your personal information.

When required by law, AW Fintech reserves the right to disclose your personal information to third parties or regulatory, law enforcement or other government authorities. We may also disclose your information to credit reporting or collection agencies, or when necessary to protect our rights or property.

If at any time you choose to purchase a product or service offered by another company, for example by clicking on an advertisement on a website owned or controlled by AW Fintech, any personal information you share with that company will no longer be controlled under our Privacy Policy. We are not responsible for the privacy policies or the content of sites we link to, and we have no control over the use or protection of information provided by you to, or collected by, those websites. Whenever you elect to link to a co-branded website or to a linked website, you may be asked to provide

registration or other information. Please note that the information you are providing is going to a third party, and you should familiarise yourself with the privacy policy published by that third party.

The security of your personal information

We employ security software, systems and procedures to offer you a safe and secure trading environment and to protect your personal, financial and trading information.

When you open an account with us, you are issued a unique account number, User ID and a password. Only a limited number of AW Fintech employees who have a need to know this information will have access to your account number, User ID, and password. Remember that you are ultimately responsible for maintaining the secrecy of your account number, User ID and password. We strongly recommend that you do not disclose this information to anyone.

Your personal information may also be held on our computer database. All computer-based information is protected by access passwords. Data is backed up regularly and stored securely off site.

Personal information will be treated as confidential information and sensitive information will be treated highly confidential. It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

Access to your personal information

You may request to access information we hold about you. We rely on your information to provide financial products and services to you. We also have an obligation to be reasonably certain that the information we hold on file for you is accurate and up to date. Please contact us if you believe information we hold about you may be incorrect, inaccurate or out of date.

Your rights

At any time, you can:

- Request to learn what Personal Information we hold about you.
- Request the deletion (erasure) of your information. This may include anonymisation pseudo-anonymisation of some data instead of total deletion.
- Correct that information online, or where this is not possible, via our service team.
- Object to the continued use, processing or storing of your personal identifiable information.
- Lodge a complaint with the regulatory authority for your country or economic zone.

Disputes

If you have a concern or complaint about how we treat your private information, please contact us to discuss. We will investigate all complaints internally and attempt to resolve the matter to your satisfaction.

If, however, you are not satisfied or we do not adequately address your concerns, you have the right of complaint to the Australian Information Commissioner. You can contact the OAIC by telephone on 1300 363 992 or by going to www.oaic.gov.au

Changes to this Privacy Policy and opting out

In the event AW Fintech materially changes this Privacy Policy, the revised Privacy Policy will promptly be posted to our websites. By opening an account with us, you agree to accept posting of a revised Privacy Policy electronically on our website as sufficient notice to you.

Under certain circumstances, such as with respect to our sharing of your personal information with non-affiliated third parties, you may inform us that you would like to 'opt out' by contacting us through the contact information listed below. Note that for joint accounts, an opt-out election made by one account owner of a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account you hold at AW Fintech.

Any dispute over our Privacy Policy is subject to this notice and the AW Fintech Account Terms. If you have any questions that this Privacy Policy does not address, please contact a Client Services representative.

You may contact AW Fintech for any reason under this Privacy Policy, or otherwise, as follows:

AW Fintech Pty Ltd

Suite 902, Level 9, 821 Pacific Highway,

Chatswood, NSW 2067 Australia

Tel: +61 2 9017 5200

Email: support@awfintech.com

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