

GO Markets Pty Ltd

Privacy Policy

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GO MARKETS
first choice for trading

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1. Introduction

Your privacy and trust are important to us, and this **Privacy Policy** ("**Policy**") provides important information about how GO Markets Pty Ltd ("**GO Markets**", "**we**" or "**us**") handle personal data. We're committed to keeping your personal data safe and confidential both online and offline.

This Policy applies to GO Markets Pty Ltd' website www.gomarkets.com/au ("**Website**"), client portals ("**CP**") and the trading platforms ("**the Platform**").

Please read this Policy carefully and contact us if you have any questions about our privacy practices.

We may make changes to this Policy from time to time and it is important that you check this Policy for any updates. If we make changes, we consider to be important, we will let you know by placing a notice on the Website or Platform or CP.

2. Privacy Acts and Privacy Policies Obligations

GO Markets, among others is bound by the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (Privacy Act).

2.1 International Privacy Scene

Local laws are just one part of a world-wide picture of privacy protection. Privacy is protected as a human right at the highest international level.

2.2 UN Instruments

The United Nations has adopted provisions or instruments that protect privacy. For example:

- Article 12 of the Universal Declaration of Human Rights;
- Article 17 of the International Covenant on Civil and Political Rights.

2.3 OECD and APEC

Several international bodies have developed more detailed guidelines for information privacy protection.

- OECD Guidelines on Protection of Privacy and Transborder Flows of Personal Data (1980)
- APEC Privacy Framework (2005)

3. GO Markets' Obligations

GO Markets places a strong emphasis on fulfilling its obligations and safeguarding the privacy of both customers and staff. The company remains dedicated to ensuring that all employees strictly adhere to the privacy policy. Additionally, GO Markets holds accountability for any actions taken by employees during their employment or if they utilize any personal information acquired during the course of their duties. GO Markets is fully committed to taking all reasonable measures to prevent such behavior among its employees. In instances where these guidelines are not followed, individuals may be held directly accountable.

GO Markets is responsible for the personal information it holds directly and all personal information that it provides to any third party acting on its behalf. GO Markets ensures that when it shares information with a third party to facilitate a service, it takes all necessary and reasonable measures to prevent unauthorized use or disclosure of that information by the recipient. As a means to enhance data protection, GO Markets insists on making the secure destruction of documents a contractual condition for any third-party engagement. This measure ensures the data's safety and privacy throughout the service provision process.

4. Personal Information

Personal Information is defined in the Privacy Act. Personal information refers to any information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information is true or not, and whether it is recorded in a material form or not. This includes, but is not limited to, names, addresses, contact details, identification numbers, financial information, photographs, and any other information that can be used to identify a specific person. The Privacy Act regulates the collection, use, storage, and disclosure of personal information by organizations and agencies in Australia to protect individuals' privacy rights.

We may collect the following types of personal information from you:

- Contact Information: Name, address, phone number, email address or a copy of a recent utility bill and other contact details.
- Financial Information: Bank account details, Bank statement, payment card information, employment details, employment history, the individual's current financial circumstances and other financial data.
- Identification Information: Government-issued ID, passport, driver's license, trust deed or other identification documents.
- Trading Activity: Information related to your trading activities, including transaction history, account balances, and trading preferences.
- other information we consider necessary for our functions and activities.

We may use your personal information for the following purposes:

- verify your identity.
- administer our products and services.
- To comply with legal and regulatory requirements.
- communicate with you regarding our services, promotions, and updates.
- improve our services and enhance user experience.
- prevent fraud, unauthorized access, or any other misuse of our services.
- provide you with technical support.
- respond to any feedback, queries, or complaints.
- enable secure access to our client area.

We're required by law to identify you if you're opening a new account or adding a new signatory to an existing account. The AML/CTF Act requires us to sight and record details of certain documents (i.e., photographic, and non-photographic documents). When you create an account on the Website, Platform or Client Portal, we require you to provide your first and last name, email address, details about your financial status, your residential address, phone number, date of birth, a copy of your photo-ID, such as passport, driving license, or national ID, a copy of a recent utility bill/bank statement (or similar) as evidence of your residential address and credit card or bank card details.

We also collect information about the form of identification used in relation to an individual in order to send or receive a transaction (required by law in some instances), and information about a transaction, including an individual's account and delivery instructions. We may also collect information about employment details, employment history, the individual's current financial circumstances; the individual's CFDs and Securities preferences and tolerance to risk; and other matters that are relevant to the services we provide.

Where necessary, we also collect information on the following individuals:

- trustees;
- partners;
- company directors and officers;
- officers of co-operatives and associations;
- client's agents;
- beneficial owners of the client; and
- persons dealing with us on a "one-off" basis.

If we need to utilize your personal data for any additional services you request while using the Website, Platform, or Client Portal, we will inform you of the specific purpose (possibly through a popup notice). In such cases, any extra terms and conditions that may apply will be clearly presented to you. Before proceeding with your application, you will be required to confirm your agreement to these additional terms and conditions.

5. Our communication with you

We may communicate with you via SMS, push notification, email, or in-app notification to provide information about our products, services, and offers. These communications will always be related to the services or products you have requested from us. Our purpose is to keep you informed about our offerings as a valued customer and to present opportunities for you to make the most of our products and services.

Our communication approach is guided by what is known as our legitimate interest, ensuring we send you only relevant and expected communications with minimal impact on your privacy.

If you no longer wish to receive email communications from us concerning the market or your platform activity, simply use the unsubscribe link provided within the email. By doing so, we will cease sending you this information via email. Otherwise, you can withdraw your consent at any time via email to support@gomarkets.com. Additionally, you have the option to manage your preferences while logged into your account. You can select the types of notifications you prefer to receive (email, SMS, push notification) and modify these preferences at any time according to your preferences.

Kindly be aware that push notifications are dispatched to all devices associated with your trading account. This includes any device where you have logged in. If you happen to use someone else's device to access your trading account or allow them to log in with your device, push notifications will be sent to those devices as well. If such a situation arises, and you wish to remove a specific device from your trading account, please reach out to our Customer Support for assistance.

6. Contacting us

You can contact us via email or use the Live Chat feature, we may request some additional personal data, such as your name, email address, and residential address. Rest assured, this data is only used to

respond to your query and verify your identity. Our internal contact systems are secure and not accessible by external parties, ensuring the confidentiality of your emails.

When you email us (through the Contact Us page) or use the Live Chat feature, you may be requested to provide some additional personal data, like your name, email address and residential address. We will use this data to respond to your query and verify your identity. Emails are stored on our standard internal contact systems which are secure and cannot be accessed by external parties.

7. Third Party login

You may choose to use your own social networking logins to log into our Platform or Client Portal. If you choose to connect using a social networking or similar service, we may receive and store authentication information from that service to enable you to log in and other information that you may choose to share when you connect with these services. These third-party services may collect information such as the web pages you visited and IP addresses and may set cookies to enable features to function properly. We are not responsible for the security or privacy of any information collected by these third parties. You should review the privacy statements or policies applicable to the third-party services you use to connect to the Platform. If you do not want your personal data shared with your social media account provider or other users of the social media service, please do not connect your social media account with your GO Markets account and do not use the related functionality on the Platform.

8. Disclosure of Personal Information

We may be required to use and disclose personal data to meet our internal and external audit requirements, for data security purposes and as we believe to be necessary or appropriate:

- a. to comply with our obligations under applicable law and regulations, which may include laws and regulations outside your country of residence;
- b. to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence;
- c. to monitor compliance with and enforce our Platform terms and conditions;
- d. to carry out anti-money laundering, sanctions or Know Your Customer checks as required by applicable laws and regulations; or
- e. to protect our rights, privacy, safety, property, or those of other persons. We may also be required to use and disclose personal data after you have closed your GO Markets account for legal, regulatory and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; or fraud prevention. We also collect and process non-personal, anonymised data for statistical purposes and analysis and to help us provide a better service.

If you are an individual in the European Economic Area (**EEA**), we collect and process information about you only where we have legal bases for doing so under applicable European Union laws. The legal bases depend on the services you use and how you use them. This means we collect and use your information only where:

- we need it to provide you with our services, provide customer support and personalised features and to protect the safety and security of our services;
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services and to protect our legal rights and interests;

- you give us consent to do so for a specific purpose; or
- we need to process your data to comply with a legal obligation.

If we or a third party (e.g., your employer) are using your information based on a legitimate interest, you have the right to object to such usage. However, please be aware that objecting to the use of your information in this context might result in you no longer being able to use our services.

9. When we share personal data

We share or disclose your personal data when necessary to provide services or conduct our business operations as described below. When we share personal data, we do so in accordance with applicable data privacy laws and our internal security standards. Below are some of the parties with whom we may share personal data and why.

9.1 Within the GO Markets affiliated companies and subsidiaries (“Group”):

GO Markets has affiliated companies and subsidiaries as part of the Group. GO Markets’ businesses are supported by a variety of the Group’s teams and functions. We may make personal data available to them if necessary for the provision of services, account administration, sales and marketing, customer, and technical support. All our employees and contractors are required to follow our data privacy and security policies when handling personal data. We may process personal data in respect of the Website and Platform in the following locations: Australia, Cyprus, Mauritius, Seychelles, United Kingdom, Malaysia and Saint Vincent and Grenadines.

9.2 Our third-party service providers:

We partner with and are supported by service providers. We will make personal data available to our service providers only when necessary to fulfil the services they provide to us, such as software, system, and platform support; direct marketing services; cloud hosting services; advertising including affiliate advertising; data analytics; and order fulfilment and delivery. Our third-party service providers are not permitted to share or use personal data we make available to them for any other purpose than to provide services to us.

We may disclose personal information to:

- IT service providers, data storage, webhosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors, payment systems operators and credit reporting agencies (CRA);
- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- sponsors or promoters of any competition we run;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- credit reporting agencies, courts, tribunals, and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties, including agents or subcontractors, who assist us in providing information, products, services, or direct marketing to you. This may include parties located, or that store data, outside of the local jurisdiction; and

- third parties to collect and process data, such as Google Analytics or other relevant businesses. This may include parties that store data outside of the local jurisdiction.

We take our obligations to protect your information extremely seriously and make every effort to deal only with parties who share and demonstrate the same attitude. Each of the third parties that we contract with is carefully selected and is only authorised to use your personal information in a secure way, that's necessary for them to perform their services to us.

9.3 Affiliate Marketing:

We have an affiliate marketing program called GO Markets Partners which is a commercial arrangement whereby third parties promote GO Markets and its products and services in return for a fee. We do not share your personal data with these third parties.

9.4 Third parties for legal reasons:

We will share personal data when we believe it is required, such as:

- To comply with legal obligations and respond to requests from government agencies, including law enforcement and other public authorities, which may include such authorities outside your country of residence.
- In the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- To protect our rights, users, systems, and services.

The third party will only process your personal information in accordance with written instructions from us. When we refer to 'processing' in this clause and this Privacy Policy in general, we mean any operation or set of operations which is performed on personal information, whether or not by automated means, such as collecting, recording, organising, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available personal information.

By providing us with personal information, you consent to the disclosure of your personal information to third parties who reside outside the respective jurisdictions and, if you are an individual located in the EEA, to third parties that reside outside the EEA.

Where the disclosure of your personal information is solely subject to local privacy laws (and not subject to the GDPR), you acknowledge that some third parties may not be regulated by local Data Protections Acts and if any such third party engages in any act or practice that contravenes, it would not be accountable under the local Data Protection Acts and you will not be able to seek redress under such local Data Protection Acts.

Where the disclosure of your personal information is subject to the GDPR, you acknowledge that there are risks if the third party outside the EEA engages in any act or practice that would contravene the GDPR and where there is no adequacy decision in place with the country outside the EEA or appropriate safeguards in place with the third party.

10. Trade activity on the Platform and CP

In order to meet with our internal compliance and regulatory obligations we monitor your trading activity such as the frequency of your trading and number of trades, and monetary activity such as number of deposits/withdrawals, payment methods used, your device information and IP.

11. How we treat personal information that is also sensitive information

Sensitive information is a sub-set of personal information that is given a higher level of protection under the local law.

Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation, sexual practices or sex life, criminal records, health information or biometric information.

We do not currently collect sensitive information from you. However, if we do so, we will not collect sensitive information from you without first obtaining your consent.

Provided your consent, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected.

Sensitive information may also be used or disclosed if required or authorised by law.

12. Our responsibilities as a 'controller' under the GDPR

Controllers are defined by the GDPR as natural or legal persons, a public authority, agency, or other body to which personal information or personal data has been disclosed, whether via a third party or not, and who determines the purposes and means of processing personal information. We are a controller under the GDPR as we collect, use, and store your personal information to enable us to provide you with our goods and/or services.

As a controller, we have certain obligations under the GDPR when collecting, storing, and using the personal information of individuals based in the EEA. If you are an individual located in the EEA, your personal data will:

- be processed lawfully, fairly and in a transparent manner by us;
- only be collected for the specific purposes we have identified in the 'collection and use of personal information' clause above
- and personal information will not be further processed in a manner that is incompatible with the purposes we have identified;
- be collected in a way that is adequate, relevant, and limited to what is necessary in relation to the purpose for which the personal information is processed;
- be kept up to date, where it is possible and within our control to do so (please let us know if you would like us to correct any of your personal information);
- be kept in a form which permits us to identify you, but only for so long as necessary for the purposes for which the personal data was collected;
- be processed securely and in a way that protects against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

We also apply these principles to the way we collect, store, and use the personal information of our customers or clients.

Specifically, we have the following measures in place, in accordance with the GDPR:

- **Data protection policies:** We have internal policies in place which set out where and how we collect personal information, how it is stored and where it goes after we get it, in order to protect your personal information.
- **Right to ask us to erase your personal information:** You may ask us to erase personal information we hold about you.
- **Right to ask us to restrict data processing:** You may ask us to limit the processing of your personal information where you believe that the personal information, we hold about you is wrong (to give us enough time to verify if the information needs to be changed), or where processing data is unlawful and you request us to restrict the processing of personal information rather than it being erased.
- **Notification of data breaches:** We will comply with the GDPR in respect of any data breach.

13. Your rights and controlling your personal information

- a. **Choice and consent:** Please read this Privacy Policy carefully. By providing personal information to us, you consent to us collecting, holding, using, and disclosing your personal information in accordance with this Privacy Policy. You must be 18 years and over to use our Site. You do not have to provide personal information to us, however, if you do not, it may affect your use of this Site or the products and/or services offered on or through it.
- b. **Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.
- c. **Restrict:** You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below. If you ask us to restrict how we process your personal information, we will let you know how the restriction affects your use of our Site or products and services.
- d. **Access and data portability:**

You have the right to inquire about the personal information we have on file for you. We are happy to provide a copy of this information in a machine-readable format such as CSV, whenever possible. If we deny access to your personal information, we'll let you know the reason why. For example, we may give an explanation of a commercially sensitive decision, or give you access to the information through a mutually agreed intermediary, rather than provide you with direct access to evaluative information connected with the decision.

Additionally, you have the option to ask us to transfer your personal information to a third party of your choosing, which is referred to as data portability.

You may also at any time contact us to request erasure of your personal data. Please

note that for legal reasons we might not always be able to comply with these requests. We will let you know if this is the case when you make your request. Please be aware that we are legally required to retain all personal information and records for a period of 7 years from the date you close your account with us, in compliance with relevant legislation.

- e. **Correction:** If you believe that any information, we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading, or out of date.
- f. **Complaints:** If you believe that we have breached the local Privacy laws and wish to make a complaint, please contact us using the details below (please refer to section 20) and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact the Office of the local Information Commissioner if you wish to make a complaint.
- g. **Unsubscribe:** To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

14. International transfers of personal data

Some of our related companies and third parties that we share information with may be located outside of Australia. These entities may be located in Cyprus, Mauritius, Seychelles, United Kingdom, Malaysia and Saint Vincent and Grenadines and other countries.

By providing your personal data, you acknowledge and agree that it may be transmitted, stored, and/or processed in a country that might not provide the same level of data protection as Australia or the European Economic Area.

We'll only disclose your personal information to an offshore recipient once we have taken reasonable contractual and practical steps to ensure that:

- (a) the overseas recipient doesn't breach the APPs; or
- (b) you'll be able to take action to enforce the protection of a law or binding scheme that has the effect of protecting the information in a way that's at least substantially similar to the way in which the APPs protect the information; or
- (c) you've consented to the disclosure after we expressly tell you that there's no guarantee that the overseas recipient won't breach the APPs; or
- (d) the disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- (e) a permitted general situation (other than the situation referred to in item 4 or 5 of the table in subsection 16A(1) of the Privacy Act) exists in relation to the disclosure of the information.

15. European and UK Representatives

Pursuant to the **General Data Protection Regulation (EU) 2016/679** ("GDPR"), GO Markets has appointed GO Markets Ltd (CySEC Licence No.322/17) as its European Representative. Any data subject requests pertaining to our EEA customers can also be directed to our European Representative at: GO Markets Ltd, at Gladstonos Street 99, Ayia Zoni, 3032, Limassol, Cyprus.

16. Data security

We are committed to safeguarding and protecting personal data and will implement and maintain

appropriate technical and organisational measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored, or otherwise processed.

Our security measures include:

- (a) educating our employees about their obligations when they collect and handle personal information;
- (b) requiring our employees to use passwords when accessing our systems;
- (c) employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems;
- (d) using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- (e) practicing a clean desk policy for all premises and providing secure storage for physical records; and
- (f) employing physical and electronic security measures such as swipe cards, alarms, cameras, and guards (as required) to protect against unauthorised access to buildings.

17. Data retention

We will only retain your personal data for as long as we reasonably require it for legal or business purposes for a 7-year period or as otherwise required. In determining data retention periods, we take into account local laws, contractual obligations, and the expectations and requirements of our customers. When we no longer need personal data, we securely delete or destroy it.

18. Cookies

Cookies are small text files placed on your device and are commonly used on the internet. We use cookies on the Website and the Platform.

We may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see Google's privacy policy or any other policies Google may use from time to time.

Most web browsers allow you to adjust settings to erase cookies, disallow cookies, or receive a warning before a cookie is set. Please note that some parts of our websites may not function fully if you disallow cookies.

19. Links to other websites

Our Site may contain links to other websites. We do not have any control over those websites, and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

20. Questions and complaints

20.1 Contact

If you have any questions about the contents of this Policy or wish to inform us of a change or correction to your personal data, would like a copy of the data we collect on you, or would like to raise a complaint or comment, please contact us using one of the following channels:

- a. Email: compliance@gomarkets.com
- b. Phone: +61 38566 7680
- c. Post: Level 11, 447 Collins Street, Melbourne, VIC 3000, AUSTRALIA

20.2 Making a complaint

We offer a free internal complaint resolution scheme to all our clients. If you have a privacy complaint, please contact us using the details above to discuss your concerns.

To assist us in helping you, please gather all supporting information and any documents relating to your complaint and provide it to us for assessment. We'll try to resolve your complaint as quickly as possible, and in any event within 30 days of hearing from you. If your complaint takes longer to resolve, we'll keep you informed of our progress.

If you're not satisfied with our handling or resolution of your complaint, there are other bodies you can contact.

The Australian Financial Complaints Authority ("**AFCA**") can consider most privacy complaints involving providers of financial services. AFCA can be contacted at:

- a. Postal address: GPO Box 3, Melbourne, VIC, 3001
- b. Phone: 1800 931 678
- c. Email: info@afca.org.au
- d. Website: www.afca.org.au

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can escalate your complaint to the data protection regulator in your jurisdiction.

- a. Postal address: GPO Box 5218, Sydney New South Wales 2001
- b. Phone: 1300 363 992
- c. Email: enquiries@oaic.gov.au
- d. Website: www.oaic.gov.au