



## Privacy Policy

Moga International Group Pty Ltd

## **Privacy Notice**

Your privacy is important to us. This statement outlines how MogaFX manages the personal information that we hold about our customers, shareholders and others. It applies to all organisations in the MogaFX group of companies.

MogaFX respects the confidentiality of information and the privacy of individuals. MogaFX is bound by the National Privacy Principles contained in the Commonwealth Privacy Act.

MogaFX's Privacy Policy Statement will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices, and to make sure that it remains appropriate to the changing environment. Any information that we hold will be governed by the most current MogaFX Privacy Policy Statement.

MogaFX's Privacy Policy is based on openness.

We are committed to being open about how we use personal information. Where our documents ask for personal information, we will generally state the purposes of its use and to whom it may be disclosed.

## **Why MogaFX Collects Personal Information**

Our business is to meet our customers' needs for a range of financial services. To do this effectively, we need to collect certain personal information.

## **Types of Personal Information Requested**

Because of the nature of the products and services provided, government regulations and taxation laws, we ask for a range of personal information from our customers. The types of personal information that we may collect can include (but are not limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, trading statements, tax and financial statements, and employment details.

We obtain most of the information directly from our customers through application or other forms and from maintaining records of information provided in the course of ongoing customer service. We may also obtain information from other sources.

We may ask for other, voluntary information from time to time (for example, through market research, surveys or special offers) to enable us to improve our service or consider the wider needs of our customers or potential customers.

If you choose not to provide the information that we need to fulfil your request for a specific product or service, we may not be able to provide you with the product or service requested.

## **Use and Disclosure of Personal Information Collected**

While we may send you marketing material from time to time that we think will be useful to you, we are conscious of the need to respect your privacy.

Unless you are informed otherwise, the personal information that we hold is used for establishing and managing your account, reviewing your ongoing needs, enhancing customer service and products, and giving you ongoing information or opportunities that we believe may be relevant to you.

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- other companies within MogaFX (including associated companies in Australia and other countries) that provide financial and other services;
- service providers and specialist advisers who have been contracted to provide us with administrative, financial, insurance, research or other services;
- credit reporting or reference agencies;
- introducing brokers with whom we have a mutual relationship (any of whom may be within or outside Australia or the Asia Economic Area);
- credit providers, courts, tribunals and regulatory authorities, as agreed or authorised by law;
- anyone authorised by an individual, as specified by that individual or the contract. Generally, we require organisations outside the MogaFX group of companies that handle or obtain personal information as service providers to MogaFX to acknowledge the confidentiality of this information, to undertake to respect any individual's right to privacy and to comply with the National Privacy Principles and this policy.

## **Sensitive Information is Subject to Greater Restrictions**

Some personal information that we hold is sensitive. The way that we use tax statements and information received from a credit reporting agency about an individual may also be restricted by law. Sensitive information may be relevant to credit and other applications. It is MogaFX's policy that sensitive information will be used and disclosed only for the purposes for which it was provided unless the customer agrees otherwise, or the use or disclosure of this information is allowed by law.

## **Management of Personal Information**

MogaFX trains its employees who handle personal information to respect the confidentiality of customers' information and the privacy of individuals. MogaFX regards breaches of your privacy very seriously and will impose appropriate penalties, including dismissal.

MogaFX has an appointed Privacy Officer to ensure that our management of personal information is in accordance with this statement and the Privacy Act.

## **How We Store Personal Information**

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, post, over the Internet or other electronic media. We hold personal information in a combination of secure computer storage facilities, paper-based files and other records, and take steps to protect the personal information that we hold from misuse, loss, unauthorised access, modification or disclosure.

We may need to maintain records for a significant period of time. However, when we consider that information is no longer needed, we will remove any details that will identify you, or we will securely

destroy the records

## **How We Keep Personal Information Accurate and Up to Date**

MogaFX endeavours to ensure that the personal information it holds is accurate and up to date. We realise that this information may change frequently with changes of address and other personal circumstances. We can generally update your customer information over the telephone. You have the right to check what personal information about you is held by us. Under the Commonwealth Privacy Act, you have the right to obtain a copy of any personal information that MogaFX holds about you and to advise MogaFX of any perceived inaccuracy. The Act does set out some exceptions to this.

To make a request, you will need to complete an application form verifying your identity and specifying what information you require.

We will acknowledge your request within 14 days and respond promptly to it. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise the probable cost in advance and can help to refine your request, if required.

## **If You Should Have a Complaint**

If you consider that any action of MogaFX breaches this Privacy Policy Statement or the National Privacy Principles, or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly. To make a complaint, please email [service@mogafox.com](mailto:service@mogafox.com)

If you are not satisfied with our response to your complaint, you can telephone the Commonwealth Privacy Commissioner's hotline on 1300 363 992.

## **How to Contact Us**

If you want to make a general enquiry about MogaFX 's privacy policy or change your personal information, please email [service@mogafox.com](mailto:service@mogafox.com). You can also obtain an application form for access to your personal information from the email address above.

## **Privacy: Web Supplement**

This statement outlines some privacy issues specific to the [www.mogafox.com](http://www.mogafox.com) website. MogaFX may collect personal information that you enter when using our website.

## **Personal Information**

When you apply for or maintain a live account with MogaFX, we collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions,

informing you about products and services that may be of interest to you, and providing customer service. Such information may include:

### **Application Information**

Information that you provide to us on applications and other forms, such as your name, address, date of birth, Social Security/National Insurance number, occupation, assets and income;

### **Transaction Information**

Information about your transactions with us and with our affiliates, as well as information about our communications with you. Examples include your account balances, trading activity, your enquiries and our responses.

### **Other Disclosures**

Personal information may be disclosed to:

- Other members of the Group for the purpose of providing services to you or for the purpose of providing you with information about those services;
- brokers and agents who refer your business to us;
- any person acting on your behalf, including your financial adviser, solicitor or accountant, executor, administrator, trustee, guardian or legal representative;
- other financial product providers to which your investment might be transferred; and
- organisations, including overseas organisations, to which we outsource certain functions.

Personal information may only be used by our agents, contractors and outsourced service providers for the purposes set out in this policy. We may also disclose personal information to other financial institutions and organisations, at their request, if you seek credit from them. We may be allowed or obliged to disclose information by law, e.g. under court orders or statutory notices pursuant to taxation or social security laws. By using the MogaFX Trading Platform, you confirm that you consent to the use and disclosure of your personal information, as set out in this policy.

### **What a Cookie is and How MogaFX Uses Cookies**

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings that you are using, where you have been on the website, when you return to the website, where you came from and to ensure that your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on the MogaFX website, including presenting web pages according to your needs or preferences.

Cookies are frequently used on many websites on the Internet, and you can choose if and how a cookie

will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of mogafx.com, if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website.

We use cookies to give you access to certain pages of the website without having to log in each time you visit. MogaFX may also use independent external service providers to track the traffic and usage on the website.

We therefore recommend enabling cookie acceptance to benefit from all the services on the website.

## **Technology Improvements**

MogaFX is constantly striving to improve functionality on this site through changes in technology. This may mean a change to the way in which personal information is collected or used. The impact of any changes in technology that may affect your privacy will be notified in this Supplement at the time of the change.

## **Links to Third-party Websites**

The MogaFX website may have links to external, third-party websites that may benefit the user. Please note, however, that third-party websites are not covered by MogaFX 's Privacy Policy and that these sites are not subject to MogaFX 's privacy standards and procedures.

## **Marketing Our Products and Services**

We may use your personal information to let you know about products and services, or promotions and other opportunities in which you may be interested. If you no longer wish to receive such communications, please email [service@mogafx.com](mailto:service@mogafx.com)