



Privacy Policy

Introduction

- a. BrightAU Capital Pty Ltd, ("BrightAU Capital" "we" or "us") are committed to protecting and respecting your privacy. BrightAU Capital Pty Ltd takes care to ensure that the information you provide to us is protected and managed in accordance with the requirements of all relevant Data Protection Regulation.
- b. This Privacy Policy explains how we use the information we collect about you, your rights under applicable data protection legislation and the procedures we have in place to safeguard your information.
- c. By using our Services, you indicate that you accept this Privacy Policy. If you do not accept this Privacy Policy, you should not use our Site.

Data Controller

- a. BrightAU Capital Pty Ltd, located at Level 1, 23-29 Hunter Street, Hornsby, NSW 2077, Australia

Information we may collect about you

- a. When you create an account with us, we are required to collect some information on you before you can use our services. Our records may include all or some of the following information about you:
 - a. Your name, gender, address, email address, telephone number, payment card details, date of birth, etc.;
 - b. details of your correspondence with us and any other information you have given to us;
 - c. details of your transactions and other activities carried out on our services.
 - d. financial information such as your income, source of funds and investment objectives
 - e. details of your visits to our websites and/or Apps including, but not limited to, traffic data, location data, IP address, device ID, web logs, page views, ad data and other similar data, whether this is required for our own purposes or otherwise; and
 - f. additional information required for authentication purposes, such as details of your driver's license, credit card statement, utility bill or similar
 - g. your response to marketing campaigns from us or through our third parties.



How we may use information about you

We may use information held about you in the following ways:

- a. to help us identify your age and identity along with any accounts you hold with us;
- b. to enable us to comply with legal and regulatory requirements.
- c. to provide you with our products and services
- d. to make our websites and facilities easier more user friendly by removing the need for you to enter repeatedly the same information;
- e. to operate and improve our websites, apps and services and to notify you of any changes to our websites, our products and services and/or apps which may affect you;
- f. to perform research and analysis aimed at improving our products and services;
- g. to enable us to offer you products and services customized to your preferences; and
- h. Subject to any applicable preferences, to enable us and our partners to send you information relating to our products and services.
- i. To carry out analysis based upon trading, location, interest, behaviour and age in order to:
 - Provide tailored marketing and offers
 - Comply with legal and regulatory obligations such as Anti Money Laundering regulations.
 - To manage risk and prevent fraud.

Legal Basis for Processing

- a. Our lawful basis for processing personal data include:
 - To fulfil a contract, we have with you.
 - When it is our legal duty to do so.
 - When it is in our legitimate interest.
 - When you consent to it.

Sharing your information

- a. Subject to relevant data processing agreements, and in full compliance with data protection regulation, we may share your personal data with:



1. members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, together with their employees or agents.
2. third party marketing services.
3. Risk and fraud monitoring services.
4. Payment Processing services.
5. law enforcement agencies or regulators in accordance with legal requirements.
6. potential purchasers or investors.

Marketing and opting out

- a. Subject to appropriate, applicable consent we may contact you via email, SMS, Telephone or post.
- b. We may also send push notifications to your mobile device to provide updates, communicate offers, promotions and other relevant messages. You can manage push notifications from your device's settings page for the relevant App.
- c. These marketing messages will provide you with information about our own products and services.
- d. If you do not want to receive offers from us, you can stop the delivery of promotional emails, postal mail and other types of promotional communications from BrightAU Capital by:
 1. Changing your marketing preferences in your BrightAU account, if you are an existing customer;
 2. following the specific instructions in any email that you receive; or
 3. contacting us via support@tradefred.com.au and asking to be removed from our marketing lists.
 4. Via your browsers and applications, where you can control notification settings.

Monitoring and use of cookies

- a. BrightAU Capital may obtain information about your use of its our Services by using web beacons and by placing a 'cookie', which is a small file, on your mobile device and/or computer's hard disk. We use two types of cookies:
 - a. Functionality Cookies - these cookies recognize you whenever you visit our websites or Apps and remember your user preferences. They also speed up access to our websites and the Apps (so you do not have to log on each time).
 - b. Advertising Cookies - these cookies are used to build a profile about you so that our marketing and advertising campaigns are more relevant to you.
- b. Using our Services will constitute acceptance of use of Cookies.

- c. Many web browsers automatically accept cookies, others may not. However, you can change your browser settings to either accept or reject cookies, according to your preference. If you do not accept cookies, you may lose some of the functionality of our websites and/or Apps. If you need more information about cookies such as what they do, how they work and how to enable/disable them, please go to www.aboutcookies.org.
- d. Please note that our advertisers and other partners may also use cookies, over which we have no control.
- e. BrightAU Capital may monitor and record its communications with you (such as telephone conversations and emails) for the purposes of quality assurance, training, fraud prevention and compliance.

Data security

- a. BrightAU Capital takes the security of your data very seriously. We will take appropriate security measures against unlawful or unauthorised processing of your information, and against the accidental loss of, or damage to, your information. Our objectives are:
 - a. Confidentiality - only authorised people can access the information.
 - b. Integrity - information should be accurate and suitable for the purpose for which it is processed.
 - c. Availability - authorised users should be able to access the data if they need it for authorized purposes.

Subject Access Request

- a. You are entitled to file a Subject Access Request (SAR) to obtain a copy of the personal information which we hold about you. In order to submit a Subject Access Request, please email dpo@tradefred.com.au with "FAO: Data Protection Officer - Subject Access Request" in the subject line. In the email body, please include the following
 - a. Your full name
 - b. Address (as registered on your BrightAU Capital account)
 - c. Contact telephone number
 - d. Specifics of any exact details which you wish to receive (for example, copies of emails sent or received)
- b. The requested information will be provided within one calendar month of the Subject Access Request being received by BrightAU Capital. If for any reason BrightAU Capital cannot meet this deadline (for example, if the requests made are numerous and complex), you will be informed of this within the initial one-month window, with an explanation as to why the data has not been provided, and a firm estimate of when the data will be collated and prepared for sending to You.

Data Retention

- a) We will only retain data for the necessary time to complete the task that the data was collected for, or to meet our legal obligations.
- b) You may request that your Personal Data be anonymised in the following circumstances:
 - 1. Where the Personal Data is no longer necessary in relation to the purpose for which it was originally collected/processed.
 - 2. When you withdraw consent, if consent is being used as the Legal Basis for Processing.
 - 3. If you object to the Processing and there is no overriding Legitimate Interest or Legal Obligation to continue the Processing.
 - 4. The Personal Data was unlawfully processed.
 - 5. The Personal Data has to be erased to comply with a legal obligation

Transfers of data out of the EEA

- a) We will not transfer Personal Data to recipients in Third Party countries that are outside of the EEA, or are not currently recognised by EU law as having an adequate level of legal protection for the rights and freedoms of data subjects unless:
 - 1. the Processor is certified under the EU-U.S. Privacy Shield Framework.
 - 2. The existence of any other specifically approved safeguard for data transfers (as recognised under EU Data Protection Laws) and/or a European Commission finding of adequacy can be demonstrated.

Third party websites

- a. Our websites and the Apps may, from time to time, contain links to the websites of our partners' networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

Contact

- a. We welcome your questions and comments relating to this Privacy Policy. We can be contacted via email or in writing at Level 1, 23-29 Hunter Street, Hornsby, NSW 2077, Australia.



- b. This privacy policy is created, controlled, and maintained by the Data Protection Officer (DPO). If you wish to contact the DPO in order to discuss how we handle and process your personal data (or to submit a Subject Access Request as discussed in the “Your Rights” section of this policy), the DPO can be contacted by email through the following address: dpo@tradefred.com.au
- c. If you are unhappy with how we have used your personal information then please let us know, so we can launch an investigation.