



Privacy Policy
GAIN Capital Australia Pty Ltd

City Index Privacy Policy

City Index ('CI') recognises the importance of your privacy and abides by the Australian Privacy Principles contained in the Commonwealth Privacy Acts (Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012).

Our policy for the collection, use and management of Personal Information is set out below. This Policy covers all those CI entities which may use your information, including GAIN Capital Australia Pty Ltd (ACN 141 774 727), GAIN Capital UK Ltd (UK Reg 1761813), GAIN Capital Singapore Pte Ltd. (Sing Co Reg 200400922K), and any other related companies.

The kinds of personal information that CI collects and holds the information

CI is required by law to collect information to identify and verify you. The type of personal information we may collect can include your name, address, date of birth, contact details, income, assets and liabilities, bank account balances, financial statements, credit reporting information and employment details.

How CI holds the information

We may collect this information when you give it to us directly in your Application Form, open and maintain an account with us, when you use our products and services, call us or visit our website to inquire as to a financial product or service offered by us or so that we may conduct business with you and may also need to do so to meet legal requirements.

CI maintains records of your Personal Information and all transactions and activities on accounts you have with CI, including details of contracts traded and margin calls made.

Please note that because of the nature of the services we provide and our associated regulatory obligations we do not have the option of allowing you to deal with us on an anonymous basis.

Why is Information Required?

CI collects and holds your Personal Information for 2 main reasons:

- **Legal** – we are required to confirm your identity and other personal details by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. We also may provide some information to credit reference agencies or service providers to confirm your credit rating.
- **Conducting business** – to help us assist you to meet your needs for conducting business with CI. During the course of our relationship with you, your Personal Information is used to manage and administer the products and services provided to you and to keep you updated whilst you are a customer in relation to various matters including the contracts you have traded, your margin obligations, the funds in your account, and other activities of CI.

We may also use your Personal Information to send you information about us, including for internal or marketing purposes about our products and services. When we send you information of this sort, we will give you the opportunity to choose not to receive any more information of that sort from us. If you do not provide us with all the information we consider to be compulsory we may be unable or limited in the services or financial products we can provide to you.

Importantly, except as set out above, we will not disclose your Personal Information unless permitted to do so by law or by regulatory requirements.

How CI holds personal information

CI allows attempts to protect your personal information from misuse and loss. We also attempt to protect it from unauthorized access, modification and disclosure by ensuring that your personal information can only be accessed by people properly authorised to have access. We may store your personal information in hardcopy documents or electronically. CI maintains physical security, such as locks and security systems, over our paper and electronic data stores and premises. We also maintain computer and network security.

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

CI may disclose personal information to overseas recipients and other entities

CI may disclose your Personal Information to its related bodies corporate, either in Australia or in countries or jurisdictions. These include the United Kingdom, Asia the Middle East and elsewhere in the world. We will take reasonable steps to ensure that all information we collect or use is accurate, complete, and up to date and stored in a secured environment and is accessed only by authorized personnel with permitted purposes.

Other entities that CI may disclose your Personal Information include

- financial institutions and other similar organizations that it deals with in the course of its corporate activities, or those that are nominated by you;
- external service providers and professional advisers (which may be located overseas) that provide services to us; and
- any organization at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant;

CI Websites

When submitting an application form (online or via a mobile application or otherwise) or other documents or when visiting our website or dealing in our products, CI will collect and retain this information.

We also collect statistical information about visitors to our websites such as the number of visitors, pages viewed, types of processes executed, time online and documents downloaded. This information is used to evaluate and improve the performance of our websites. Unless Clients have provided information to us, we do not collect any personal information through our websites other than statistical information.

You should also be aware that we use cookies on our websites. A cookie is a small amount of data, which often includes a unique identification number or value that is sent to your browser from a website's computer and stored on your computer's hard drive. Each website can send its own cookies to your browser if your browser allows it. However, to protect privacy, your browser only allows a website to access the cookies it has sent to your computer.

Cookies are used on our websites to collect the aforementioned statistical information and so that clients can access their accounts on-line. When accessing accounts on-line a cookie will be created which uniquely identifies the computer, username and password. This eliminates the need to re-enter the aforementioned data each time accounts are accessed online.

Most internet browsers are set up to accept cookies. If clients do not wish to receive cookies, they may be able to change the browser settings to refuse all cookies or have their computer notify them each time a cookie is sent, thereby giving the choice whether to accept it or not. If clients reject all cookies, they will be unable to access accounts on-line. clients can also delete cookies from computers after they have been created.

Telephone conversations

CI may record telephone conversations and 'live' chats. Such recordings, or transcripts from such recordings, may be used to resolve any dispute.

Recordings or transcripts made by CI may be destroyed under CI's normal practice. Ordinarily, but not necessarily, this is two months after the date on which the conversation occurred.

Access to your information and corrections

If you wish to access, modify or correct your Personal Information which we hold about you, please contact us by phone or email.

For customers in Australia: 1800 354 182
For customers elsewhere: +61 2 9270 3682
or email clientservices@cityindex.com.au

We will process your request usually within 14 days. There is normally no fee for requesting access to your information, though depending on the complexity of your request, we may charge a fee for processing the request, which is disclosed in our PDS.

If you do not wish us to send you information on our products or services, please tell us when we collect the information from you.

Resolving your privacy complaints

If you are unhappy with any aspect of our collection or use of your Personal Information, or you believe that your privacy has been compromised by us, you can complain.

To make a complaint, please contact the Compliance Department of CI by phone or email:

For customers in Australia: 02 9270 3600
For customers elsewhere: +61 2 9270 3600
or email compliance@cityindex.com.au

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