

Overview

This is the Privacy Policy of Monex Securities Australia Pty Ltd ('Monex AU', 'we', 'us', 'our') ABN 84 142 210 179, an Australian Financial Services company (AFSL 363972).

Protecting your personal information is of the utmost importance to us.

With our commitment to ensuring the safety of our customers' personal and confidential information and protecting your individual right to privacy, we have established a Privacy Policy in accordance with the Privacy Act 1988 (Cth) (Privacy Act), the Australian Privacy Principles (APPs) and to the extent applicable, the EU General Data Protection Regulation (GDPR).

Purpose

The purpose of this policy is to provide you with information on the type of personal information that we collect and retain. It also explains how we handle your personal information in accordance with the Australian Privacy Principles (APPs).

This policy outlines:

- The type of personal information that we collect and store.
- The business purposes for which we collect, hold, use and disclose personal information to third parties.
- How you may access your personal information and correct any information held by us.
- How you may raise any concern or complaint about a breach of the Australian Privacy Principles, and how we will deal with such a complaint; and
- Whether we will disclose your personal information to overseas recipients and the specific countries to which information may be sent.
- In the event of unauthorised access of your personal information, the steps we will undertake to inform you and the OAIC in accordance with Notifiable Data Breaches (NDB) Scheme reporting requirements effective from 22nd February 2018.

Except as outlined below, we do not share, or sell, or disclose to a third party, any personally identifiable information collected on our website.

Please contact us on +61 2 9103 9600 if you require further information about this Privacy Policy or whether you require information of the type of personal information held. Please contact us if you believe your personal information is inaccurate, incomplete or not current.

The type of personal information we collect and store

'Personal information' is any information that can personally identify you as an individual.

We are required to obtain personal information about you to ensure we can provide you with financial products and services pertaining to your account and comply with legislative and regulatory requirements in Australia.

Further, when you apply for, or maintain your Monex AU trading account, the personal information we will collect from and about you is for purposes such as confirming your identity, evaluating your suitability in relation to our products and services, processing your requests and transactions on your behalf. We may use your personal information to inform you about products and services that may be suitable to you and providing customer service support.

We are required to collect your personal information to confirm your identity. We will collect personal information directly from you and commercially available third-party databases and publicly available resources for the purpose of complying with our obligations under Anti-Money Laundering laws (Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), as amended).

We collect or confirm your personal information from a third-party service provider such as a credit-reporting agency or through an identity or document verification service (DVS) provider. You grant your consent to this procedure when you agree to our Securities Trading Terms and Conditions.

Such information may include:

- Application related information: Identification information (“Client Identification Data” or “CID”), such as your name, residential and postal address, email address, telephone number/s, date of birth, government identification numbers, your occupation, source of funds and bank account details to settle your transactions on your behalf;
- Transaction related information: Information about your transactions with us. Examples include your Broker-to Client Assigned Number (“BCAN”), Account Balances, Trading Activity, your Inquiries, and our Responses.
- Verification information: Information necessary to verify your identity, such as a passport or driving license. Examples also include background information about you we may obtain from public records, third party credit reporting agencies and DVS or from other entities not affiliated with us. Australian Money Laundering Regulations require us to collect information and take actions necessary to verify your identity.

We will not collect sensitive personal information unless you have consented or an exemption under APPs applies. These exemptions include if the collection is required or authorised by law or if it is necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

By not providing us your personal information for the purpose of establishing a trading account, we may delay or not be able to provide you with some or all the products or services we make available.

We will not accept the option of dealing with you anonymously, or under a pseudonym. This is because it is impractical for us to deal with individuals who are not identified.

We may receive unsolicited personal information about you. Our employees are required to notify the Privacy Officer of all unsolicited personal information received by them.

Further, when you visit our website (www.monexsecurities.com.au), use our software applications (apps) or other web-based content and services (“Websites”), our service providers or us will record information (such as your computer’s IP address and top level domain name, the type of browser you are using, the date, time and pages accessed) in relation to your visit. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

Our Website, the use of cookies and website analytics.

We use cookies and other technologies to grant you access to our website and to create a personal record of when you visit our website and the pages you view so that we may serve you more effectively. We also use cookies to monitor traffic patterns, manage advertising and other activities. Further, third party vendors, including Google, use cookies to serve ads based on a user's prior visits to our website or other websites. Google's use of advertising cookies enables it and its partners to serve ads to you based on your visit to our website and other websites on the Internet. You may opt out of personalised advertising by visiting Ads Settings; alternatively, you may opt out of third-party vendor's use of cookies by visiting www.aboutads.info.

You can configure your Internet browser to notify you when you receive a cookie, please consult with your Internet browser provider on how to do this.

If you elect to disable the use of cookies on your web browser or, deny specific cookies from the website or linked sites, then you may not be able to gain full access to all of the content and facilities within our website which may affect your user experience.

Given our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and these websites are not subject to our privacy policies and procedures.

Your domain name and e-mail address

This information is recognised by our servers and the pages that you visit are recorded. We shall not under any circumstances, divulge your e-mail address to any person who is not an employee or contractor of Monex AU, and who does not need to know, either generally or specifically. This information is used:

- To correspond with you or deal with you as you expect.
- In a collective way not referable to any particular individual, for the purpose of quality control and improvement of our site.
- To send you news about the services to which you have signed up.
- To tell you about other of our services or services of sister web sites.

Calling our Contact Centre

When you call us, we may collect Calling Line Identification (CLI) information. We may use this information to help improve the efficiency and effectiveness of our services.

Monex AU or other parties providing connected services to us may record telephone conversations.

Sending an electronic message to our support system

When you send an electronic message or mail to us, we may collect the data you have given to us in that message in order to obtain confirmation that you are entitled to receive the information and to

provide to you the information you need. We may record your request and our reply in order to increase the efficiency of our business. We may retain personally identifiable information associated with your message, such as your name or email address. Please notify us if you do not wish for this information to be retained.

The purposes for which we collect, hold, use and disclose your personal information

We are required by law to collect information to identify and verify you. We make enquiries as to your identity (identities) and other personal details in accordance with Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), as amended.

We will only use your personal information for the purpose of providing you with our financial products and services. Your personal information will be used by us for the purpose of assessing your application, communicating with you in relation to your account so We can provide a continuous service to you and to operate our business processing functions by disclosing your personal information to our related business entities, appointed service providers or other third parties.

We will also use your personal information to assist us with administrative, marketing and direct marketing, product or service development and internal quality assurance and control functions.

Keeping information accurate and up to date

We take all reasonable steps to ensure that all personal information we hold is as accurate as possible. You can contact us if you believe the information, we have about you is inaccurate or incomplete, or to provide us with information about changes to your personal information.

Keeping your personal information and data secure

We will keep your personal information secure from misuse, loss, interference, unauthorised access, modification or disclosure. We have security measures in place such as encryption, firewalls, intrusion detection and anti-virus technology to prevent unauthorised access.

We retain information for so long as may be necessary to respond to issues that may arise at a later date, and longer in appropriate cases where required by law. When personal information is no longer required by us, it is deleted, destroyed or de-identified.

The Internet is inherently insecure, and we cannot give any assurance to any person regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the Internet. Accordingly, any personal information or other information, which you transmit to us online, is transmitted at your own risk.

When you open an account with us, you are issued a unique account number, login and a password. You are ultimately responsible for maintaining the confidentiality of your account number, login, and password. We strongly recommend that you do not disclose this information to anyone else.

Direct marketing

We may also send you direct marketing communications and information about our products and services by mail, SMS and email. You consent to us sending you those direct marketing communications by any method. You can opt-out of receiving marketing communications from us by contacting us by telephone or in writing. We will then ensure that your name is removed from the relevant list.

Please note that that we may be required to send you essential information about your account, the relevant services or products and other information required by law, such as welcome emails, trade confirmations and holding statements. This type of information, for the purpose of this policy, is not deemed direct marketing.

External Websites

Our website may contain references or links to other external websites. Those references or links may in turn refer or link to other references or links. We are not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of every website that collects personal identifiable information.

Disclosure to third parties and overseas recipients

We will only use or disclose your personal information collected from and about you for the purpose for which you provided it to us (or related purposes which would reasonably be expected, without your permission, or as permitted by the Australian Privacy Principles).

We take reasonable steps to ensure that any third-party organisations we engage with to deliver our products and services abide by our confidentiality and privacy requirements in relation to the protection of your personal information.

We also disclose your personal information to entities located overseas for one or more of the purposes set out below. We will take reasonable steps to ensure that the overseas recipient of your personal information does not breach the Australian Privacy Principles relating to your personal information.

Examples of when your personal information may be disclosed to external parties include (but are not limited to) the following:

- Affiliates, agents, contractors, or external service providers appointed by us (such as our custodians, liquidity providers and appointed auditors).
- A government or regulatory body (such as ATO, AUSTRAC, ASIC or an Australian law enforcement agency).
- External service providers that provide services to us including electronic identification services.

- Credit reporting agency, any credit provider whose details have been provided to us by you; and
- In order to comply with a court order or in conjunction with court proceedings.

We may also provide your personal information to a third party if Monex sells its business assets or engages a third-party service provider to provide services to Monex (such as software services).

We reserve the right to share personal information to third parties as required by law to regulatory, law enforcement or other government authorities. Except as described in this privacy policy, we will not use your personal information for any other purpose, unless we describe how such information will be used at the time you disclose it to us, or we obtain your permission.

Further, we may need to share some of your information with organisations outside Australia. For example, when we use service providers located overseas to perform a function on our behalf.

Monex AU may share your information with overseas organisations that are located in the following countries:

- Hong Kong
- Japan
- China
- Singapore
- United States
- United Kingdom

When we share your information with organisations overseas, we ensure appropriate data handling and security measures are in place.

Data may be “processed” outside Australia

Our web sites are hosted in Hong Kong and in the secure Google cloud regions of Hong Kong, Australia and USA. We also use outsourced services in countries outside Australia from time to time in other aspects of our business. Our technical centre is based in Hong Kong. Accordingly, data obtained within Australia may be “processed” outside Australia and data obtained in any other country as noted above may be processed within or outside that country.

Further, to ensure your account is operating effectively with access to the full product features we have to offer, we will exchange your personal information with Monex BOOM Securities (H.K.) Limited (“BOOM”), a financial services company registered in Hong Kong. BOOM is our appointed international broker, clearing and settlement participant, and custodian for the safe keeping of your assets (Participant ID: 1740).

To ensure that your trading information is processed in accordance with your instructions, BOOM is required to exchange your personal information in accordance with the market rules and regulations of Hong Kong Exchanges and Clearing Limited (“HKEX”), The Stock Exchange of Hong Kong Limited (“SEHK”), Hong Kong Securities Clearing Company Limited (“HKSCC”), Shanghai Stock Exchange

("SSE"), Shenzhen Stock Exchange. Please contact us if you would like further information on the data transmitted to these foreign exchanges to abide by their local regulations.

By opening an account with us and using our products and services, you authorise us to provide BOOM with the necessary personal information for any foreign trading BOOM executes on your behalf. BOOM may use your personal data for the purposes of complying with the requirements of the SEHK rules as applicable in connection with the China Connect Market. Your personal data will be stored, used, disclosed, transferred and otherwise processed for the above purposes, whether before or after such purported withdrawal of consent.

If you choose not to allow Monex AU to share your personal information with BOOM, Monex AU may not be able to carry out your trading instructions and you will be prevented from trading Chinese markets via BOOM's China Connect Service.

General Data Protection Regulation (GDPR) for the European Union (EU)

Monex AU complies with certain principles of data protection that are set out in the GDPR for the purpose of fairness, transparency and lawful data collection and use.

We process your personal information as a Controller and Processor and/or to the extent that we are a Controller as defined in the GDPR.

We must establish a lawful basis for processing your personal information. The legal basis for which we collect your personal information depends on the data that we collect and how we use it.

We will only collect your personal information with your express consent for a specific purpose and any data collected will be to the extent necessary and not excessive for its purpose. We will keep your data safe and secure.

We will also process your personal information if it is necessary for our legitimate interests, or to fulfil a contractual or legal obligation.

We do not collect or process any personal information from you that is considered "Sensitive Personal Information" under the GDPR unless we have obtained your consent, or if it is being collected subject to and in accordance with the GDPR.

You must not provide us with your personal information if you are under the age of 18 without the consent of your parent, guardian or someone who has parental authority for you. We do not knowingly collect or process the personal information of children.

Your rights under the GDPR

If you are an individual residing in the EU, you have certain rights as to how your personal information is obtained and used. Monex Securities Australia Pty Ltd complies with your rights under the GDPR as to how your personal information is used and controlled if you are an individual residing in the EU

Except as otherwise provided in the GDPR, you have the following rights:

- to be informed how your personal information is being used.
- access your personal information (we will provide you with a free copy of it).
- to correct your personal information if it is inaccurate or incomplete.

- to delete your personal information (also known as "the right to be forgotten").
- to restrict processing of your personal information.
- to retain and reuse your personal information for your own purposes.
- to object to your personal information being used; and
- to object against automated decision making and profiling.

Please contact us at any time to exercise your rights under the GDPR at the contact details in this Privacy Policy.

We may ask you to verify your identity before acting on any of your requests.

Disclosure to Governments and their agencies

We are subject to the law like everyone else. We may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

Compliance with the law

This Privacy Policy aims to comply with the law of Australia and to the extent applicable, EU GDPR.

If you have any concerns regarding this policy, how we use, collect and store your personal information, we would like to hear from you. It is your choice as to whether you wish to use our services or not.

Further, Monex AU has an internal policy on dealing with data breaches as a result of unauthorised access to your personal information in accordance with the mandatory data breach-reporting requirements effective in Australia since 22nd February 2018.

Our data breach response policy contains four key steps including actions to be taken to contain the breach, evaluating the risks, impact to you as our customer and steps on notification to the OAIC, affected individuals and law enforcement agencies (as applicable). Further information is available to you on request.

Accessing personal information held by us

Under the Privacy Act, the Australian Privacy Principles (APPs) and to the extent applicable the EU GDPR, you have the right to obtain a copy of any personal information that we hold about you and to advise us of any inaccuracies.

To make a request, you will need to write to us verifying your identity and specifying what information you require. We will respond to your request within 14 days. If the information sought after is extensive, we may charge a fee to cover cost.

In normal circumstances we will give you full access to your information. However, there may be times where some legal reason requires us to deny access, such as where granting access would interfere with the privacy of others or it would result in a breach of confidentiality. If access is denied, we will give you written reasons for any refusal.

We aim to ensure that the personal information held about you is accurate, complete and up to date. You should contact us as soon as possible if any of your details change. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

Monex has regulatory obligations to keep your Personal Information on record for a period of seven years in the case you wish to terminate your working relationship with us.

Privacy concerns or complaints

If you believe that your privacy has been breached or compromised, please contact our Privacy Officer and provide details of the incident so that we can investigate it immediately.

We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. We will attempt to confirm as appropriate and necessary your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will investigate, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

The Privacy Officer – Alex Douglas

Monex Securities Australia Pty Ltd

Registered Address: Level 11, 300 George Street, Sydney NSW 2000

Postal Address: Level 11, 300 George Street, Sydney NSW 2000

Email: complaints@monexsecurities.com.au

Phone: +61 2 9103 9600

You may refer your complaint directly to the relevant External Dispute Resolution (EDR) scheme.

Australian Financial Complaints Authority

GPO Box 3

Melbourne Vic 3001

Phone: 1800 931 678

Email: info@afc.org.au

website: www.afc.org.au

Office of the Australian Information Commissioner (OAIC)

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

website: www.oaic.gov.au

Opting Out or unsubscribing to our service

You are not required to supply any of the personal information that we may request from you although failure to do so may result in us being unable to open or maintain your account or provide services to you. While we make every effort to ensure that all information we hold about you is accurate, complete, and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information.

Please contact us should you wish to unsubscribe from any general non-account specific information on Monex AU products and Services.

Changes to Privacy Policy

From time to time, we may change this Privacy Policy. All updates to the privacy policy will be made available to customers and prospective customers on our website.

Contact Details

If you have any questions regarding our Privacy Policy or handling of information, please contact us.

Should you wish to obtain further information about privacy you can do so by visiting the Office of the Australian Information Commissioner (OAIC) website at www.oaic.gov.au .

Dated: 1 10 March 2020 (version 3.0)



隐私政策

发行日期: 2020 年 03 月 10 日

Monex Securities Australia Pty Ltd

AFSL No: 363972 | **ABN:** 84 142 210 179

注册地址: Level 11, 300 George Street Sydney NSW 20002

敬请注意：英语是澳大利亚 Monex 证券的主要使用语言，亦是澳大利亚 Monex 证券所有法律约束力的语言。如翻译版本和英文版本有任何出入，请以英文版本为标准。

概述

本政策为澳大利亚 Monex 证券私营有限公司（被称为“Monex AU”，“我们”，“我们的”）ABN84 141 210 179 的隐私政策。我们是一家澳大利亚的金融服务公司，金融服务牌照 AFSL363972。

保护您的个人信息对我们来说至关重要。

我们根据《澳大利亚隐私原则》（“APPs”）和《1988 年隐私法案》（“隐私法案”）以及《欧盟通用数据保护条例》（GDPR）的约束，并在适用的范围内制定了本隐私政策。我们承诺保证我们客户的个人信息和保密信息的安全，并保护您的个人隐私权利。

目的

本政策的目的是向您介绍我们收集并存储您的个人信息的种类。以及我们如何根据《澳大利亚隐私原则》（APPs）处理您的个人信息。

政策概述：

- 我们收集并储存的个人信息类型；
- 我们收集，持有，使用并向第三方披露个人信息的业务目的；
- 您将如何访问您的个人信息并更正我们掌握的任何信息；
- 若我们违反《澳大利亚隐私原则》，您可以如何提出疑虑或投诉，以及我们将如何处理此类投诉；以及
- 我们是否会将您的个人信息披露给海外接收方以及可能将把个人信息发给的国家；
- 若须未经授权即获取您的个人信息，我们将根据 2018 年 2 月 22 日生效的可报告的数据泄露（NDB）方案要求通知您及 OAIC。

除非在本政策中列出，否则我们不会将任何在我们网站上收集的透露个人身份的信息向任何第三方分享、出售、或披露。

如果您需要关于此隐私政策的更多信息，或者您想了解我们所拥有的信息类型，请致电+61 2 9103 9600 联系我们。如果您认为您的个人信息不准确、不完整或者不是最新，请联系我们。

我们收集并存储的个人信息类型

“个人信息”指可以用于识别您个人的任何信息。

我们需要获取您的个人信息，以确保在遵守澳大利亚法律法规的前提下，为您的账户为您提供相关金融产品和服务。

此外，当您向 Monex AU 申请股票交易账户时，我们收集的关于您的信息将用于确认您的身份、评估您与产品和服务的契合度、代表您处理您的请求和交易等用途。我们会通过您的个人信息通知您可能适合您的产品和服务的信息，并向您提供客户服务及支持。

我们需要收集您的个人信息以确认您的身份。我们将直接和您收集个人信息，或者从商业允许的第三方数据库以及公众可获取的来源收集您的个人信息，目的是为了遵守反洗钱法（《反洗钱法和反恐金融法案 2006》）中规定的义务。

我们会从第三方服务提供商，例如信用报告机构、身份或文件验证服务（DVS）提供商处收集或确认您的个人信息。您同意我们的《证券交易条款与条件》，即代表同意我们进行此步骤。

此类信息可能包括：

- 与申请相关的信息：身份信息（“客户身份数据”，或称为“CID”），比如您的姓名、住址、邮寄地址、电邮地址、电话、生日、官方身份证号、职业、资金来源、银行账户详情等，以代表您进行交易；
- 与交易相关的信息：关于您和我们交易的信息。例如：交易账户号码（‘BCAN’），账户余额，交易活动，您的询问和我们的答复；
- 验证信息：验证您的身份所需的信息，例如您的护照或驾照等。此外还包括可能从公开记录、第三方信用报告机构以及身份或文件验证服务、或其它非我方附属实体处所获取的您的背景信息。澳大利亚洗钱法条例要求我们收集信息并采取必要措施来验证您的身份。

除非经过您的同意，或经 APPs 条款豁免，否则我们不会收集个人敏感信息。这些豁免包括是否收集信息为法律所要求或授权，或者是否有必要对涉嫌非法活动或严重不当行为采取适当行动。

如果我们要求提供的个人信息未被提供，我们可能会延迟或无法向您提供我们的部分或全部产品及服务来满足您的要求。

我们不会与身份未识别的个人进行交易，因此我们不接受您以匿名或化名的交易。

我们可能会收到有关您的未经请求的个人信息。我们的员工必须将他们收到的所有未经请求个人信息报告给隐私官员。

此外，当您访问我们的网站 www.monexsecurities.com.au 使用我们的软件应用程序（“Apps”）或其他基于网站的内容和服务（“网站”）时，我们的服务提供商或我们将记录与您的访问相关的信息，例如您的计算机的 IP 地址和顶级域名、您使用的浏览器类型、访问日期、时间和页面。这些信息将会汇总后用于分析我们网站的使用情况，从而我们能提高我们的服务。

我们的网站、使用 cookies 和网站分析

当您访问我们的网站以及查看相关页面时，我们使用 cookie 和其他技术授予您访问我们网站的权限并创建个人记录，从而更有效地为您服务。

我们还使用 cookie 来监控流量模式、管理广告和其他活动。此外，包括 Google 在内的第三方供应商会使用 Cookie 根据用户之前访问我们网站或其他网站的记录投放广告。利用广告 Cookie，Google 及其合作伙伴能够根据您访问我们的网站和互联网上的其他网站向您投放广告。您可以在广告设置页面选择停用个性化广告；或者您可以访问 www.aboutads.info 选择禁止第三方供应商使用 cookie。

您可以将 Internet 浏览器配置为在收到 cookie 时通知您，请咨询您的 Internet 浏览器提供商，了解如何执行此操作。

如果您选择禁止在 Web 浏览器上使用 cookie，或者拒绝从网站或链接的站点中拒绝特定的 cookie，那么您可能无法获得对我们网站内所有内容和设施的完全访问权限，这可能会影响您的客户体验。

我们的网站可能包括通往其他网站的链接。我们不对链接网站的隐私实践负责，这些网站不受我们的隐私政策和程序的约束。

您的域名和电子邮件地址

我们的服务器会识别信息，并记录您访问的页面。在任何情况下，我们都不会将您的电子邮件地址泄露给非 Monex AU 的员工或承包商，以及无需大体上或具体了解的人。此信息用于如下方面：

- 按照您的期望与您沟通或处理您的事务；
- 为了控制质量并改进我们的网站采用集体方式，不与任何特定个人相关；
- 向您发送您已注册的服务相关的新闻；
- 告知您我们的其他服务或姐妹网站的服务。

致电我们的联络中心

当您向我们致电时，我们可能会收集号码显示信息。我们可能会使用此信息来帮助提高我们服务的效率和有效性。

Monex AU 或者连接服务提供商会记录电话录音。

向我们的支持系统发送电子消息

当您向我们发送电子邮件或信件时，我们可能会收集您在该邮件中提供给我们的数据，以确认您有权获得该信息并向您提供所需信息。为提高我们的业务效率，我们可能会记录您的请求和我们的回复。我们可能会保留与您的消息相关的个人身份信息，例如您的姓名或电子邮件地址。如果您不希望我们保留此信息，请通知我们。

我们收集、持有、使用和披露您的个人信息的目的

法律要求我们收集信息以识别和验证您的身份。我们会根据《反洗钱和反恐融资法案 2006》询问您的身份和其他个人详细信息。

我们仅会将您的个人信息用于向您提供我们的金融产品和服务。我们将使用您的个人信息来评估您的申请、与您就您的账户进行沟通，以便我们向您提供持续的服务，并通过向我们的相关业务实体、指定服务提供商或其他第三方披露您的个人信息来进行业务处理。

您的个人信息还将用于在行政、营销和直接营销、产品或服务开发以及内部质量保证和控制功能方面协助我们。

保持信息准确并切合目前情况

我们采取一切合理措施确保我们掌握的所有个人信息尽可能准确。如果您认为我们提供的有关您的信息不准确或不完整，或者想要向我们提供有关更改您个人信息的信息，您可以与我们联系。

确保您的个人信息和数据安全

我们将保护您的个人信息免遭滥用、丢失、干扰、未经授权获取、修改或披露。我们采取了加密、防火墙、入侵检测和防病毒技术等安全措施，以防止他人未经授权获取您的信息。

我们保留信息的时间可能较长，以便应对日后可能出现的问题，并可在法律要求的适当情况下延长。当我们不再需要个人信息时，会将其删除、销毁或取消识别。

互联网本质上不是绝对安全的，我们无法向任何人保证您在线与我们沟通的信息在传输时绝对安全。我们也无法保证您提供的信息在通过互联网传输时不会被截获。因此，您传输给我们的任何个人信息或其他信息的传输风险由您自行承担。

当您在我们的平台上开立账户时，您将获得唯一的账号、登录名和密码。您有完全责任保障您的帐号、登录名和密码的机密性。我们强烈建议您请勿将此信息透露给任何其他人。

直销

我们还可能通过邮件、短信和电子邮件向您发送有关我们产品和服务的直接营销信息。您同意我们可通过任何方式向您发送这些信息。您可以通过电话或书面形式联系我们取消接收此类营销信息。之后我们确保将从相关列表中删除您的姓名。

请注意，我们可能会按照相关要求向您发送有关您的帐户、相关服务或产品的重要信息以及法律要求的其他信息，例如欢迎邮件、交易确认和持有声明。根据本政策宗旨，此类信息不被视为直接营销信息。

外部网站

我们的网站可能包含其他外部网站的引用或链接。这些引用或链接也可能引用或链接其他引用或链接。我们对其他此类网站的隐私实践不承担任何责任。我们鼓励客户离开我们的网站时要注意阅读每个收集个人身份信息的网站的隐私声明。

向第三方和海外接受者披露

我们只会使用或披露从您处收集的您的个人信息，以及关于您的个人信息用于您提供给我们的目的（或在未经你许可或《澳大利亚私隐原则》所准许的情况下，合理地预期有关目的）。

我们采取合理措施确保与我们合作的任何第三方组织提供我们的产品和服务，并遵守与您的个人信息保护相关的保密和隐私要求。

我们还会出于一个或多个目的向海外实体披露您的个人信息，列出如下。我们将采取合理措施确保您的个人信息的海外接收者不违反与您的个人信息相关的《澳大利亚隐私原则》。

可能向外部方披露您的个人信息的示例包括（但不限于）以下内容：

- 我们指定的关联公司、代理商、承包商或外部服务提供商（例如我们的托管人和指定的审计师）；
- 政府或监管机构（如澳洲税务局、澳大利亚交易报告分析中心、澳大利亚证券和投资委员会或澳大利亚执法机构）；
- 为我们提供服务的外部服务提供商，包括电子识别服务；
- 您提供给我们的详细信息所属的信用报告机构、任何信用提供者；和
- 为了遵守法院命令或服从法院诉讼。

如果 Monex AU 出售其业务资产、或者聘请第三方服务提供商为 Monex AU 提供服务（如软件服务），我们也可能会向第三方提供您的个人信息。

我们有权根据法律要求向监管机构、执法机构或其他政府机构等第三方提供个人信息。除非本隐私政策中另有说明，否则我们不会将您的个人信息用于任何其他目的，除非我们指出了在您向我们披露此类信息或我们获得您的许可时如何使用这些信息。

此外，我们可能需要与澳大利亚境外的组织共享您的一些信息。例如，当我们聘用位于海外的服务提供商代表我们履行职责时。

Monex AU 可能会与位于以下国家/地区的海外组织共享您的信息：

- 香港
- 日本
- 中国
- 新加坡
- 美国
- 英国

当我们与海外组织共享您的信息时，我们确保数据处理得当并采取安全措施。

数据可能在澳大利亚境外“处理”

我们的网站驻留在香港以及香港，澳大利亚和美国的 Google Cloud 安全区域。我们还在澳大利亚以外的国家/地区不时在我们其他业务领域使用外包服务。我们的技术中心位于香港。因此，在澳大利亚境内获得的数据可以在澳大利亚境外“处理”，并且如上所述在任何其他国家获得的数据可以在该国内外处理。

此外，为了确保您的帐户能够有效运作并获得完整产品功能，我们将与在香港注册的金融服务公司—Monex 宝盛（香港）有限公司（“宝盛”）交换您的个人信息。宝盛是我们指定的国际经纪人、清算和结算参与者，以及您资产的保管人（参与者编号：1740）。

为确保您的交易信息按照您的指示处理，宝盛须根据香港交易及结算所有限公司（“HKEX”）、香港联合交易所有限公司（“SEHK”）的市场规则和规定交换您的个人信息。

香港中央结算有限公司（“HKSCC”）、上海证券交易所（“SSE”）、深圳证券交易所。如果为遵守当地法规，您想了解有关传输到这些外汇交易所的数据的更多信息，请与我们联系。

在我们的平台开立账户并使用我们的产品和服务表明您授权我们向宝盛提供其为您开展对外交易所需的个人信息。Monex 宝盛可能会将您的个人数据用于遵循香港联合交易所规则与中华通市场相关的要求。无论是在所称同意终止之前还是之后，您的个人数据都将被存储、使用、披露、转移和以其他方式处理。

如果您选择不允许 Monex AU 与 Monex 宝盛共享您的个人信息，Monex AU 可能无法执行您的交易指示，您将无法通过 Monex 宝盛的中华通服务在中国市场交易。

欧盟通用数据保护法规（GDPR）

Monex AU 遵守 GDPR 中规定的某些数据保护原则，目的是公平、透明和合法地收集和使用数据。

我们会以控制者和处理者的身份和/或在我们是 GDPR 中定义的控制者的范围内处理您的个人信息。

我们必须为处理您的个人信息建立合法依据。我们收集您的个人信息的法律依据取决于我们收集的数据及其使用方式。

我们只会在您明确同意的特定目的下收集您的个人信息，并且所收集的任何数据都将在必要的范围内，并且不会超出目的。我们将确保您的数据安全。

我们还将出于我们的合法利益或履行合同或法律义务所必需，来处理您的个人信息。

除非我们征得您的同意，或者在遵守 GDPR 的前提下收集信息，否则我们不会收集或处理根据 GDPR 被视为“敏感个人信息”的任何个人信息。

未经您的父母，监护人或具有父母授权的人的同意，如果您未满 18 岁，则不得向我们提供您的个人信息。我们不会有意收集或处理儿童的个人信息。

您在 GDPR 下的权利

如果您是居住在欧盟的个人，则对于如何获取和使用您的个人信息拥有一定的权利。如果您是居住在欧盟的个人，Monex AU 会遵守 GDPR 规定的有关您个人信息的使用和控制方式的权利

除非 GDPR 另有规定，否则您拥有以下权利：

- 告知您如何使用您的个人信息。
- 访问您的个人信息（我们将为您提供免费的副本）。
- 如果您的个人信息不正确或不完整，请更正。
- 删除您的个人信息（也称为“被遗忘的权利”）。
- 限制处理您的个人信息。
- 为个人目的保留和重用您的个人信息。
- 反对您的个人信息被使用；和
- 反对自动决策和分析。

请根据本隐私政策中的联系方式随时与我们联系来行使您的 GDPR 的权利。

我们可能会要求您在执行任何请求之前先验证您的身份。

向各国政府及其机构披露

如果法律机构提出要求或有相关授权，例如搜查令或法院命令，我们可能需要向其提供信息。

遵守法律

本隐私政策的编制旨在遵守澳大利亚的法律，并在适用的情况下遵守欧盟 GDPR。如果您对此政策有任何疑问，如我们将如何使用，收集和储存您的个人信息，我们希望听取您的意见，但最终您可以选择是否使用我们的服务。

此外，Monex AU 根据自 2018 年 2 月 22 日起在澳大利亚生效的强制性数据泄露报告要求，针对未经授权获取您的个人信息而造成数据泄露制定了内部政策。

我们的数据泄露响应政策包含四个关键步骤，包括采取措施控制违规行为、评估风险、对您作为我们客户的影响以及向信息委员会、受影响个人和执法机构（如适用）发出通知。我们会根据需求向您提供更多信息。

获取我们持有的个人信息

根据《1988 年隐私法案》，并在适用的情况下根据遵守欧盟 GDPR，您有权获取我们持有的有关您的任何个人信息的复印件，并将任何不准确之处告知我们。

如需提出请求，请您通知我们以验证您的身份并明确您需要的信息。我们将在 14 天内回复您的请求。如果所寻求的信息很广泛，我们可能会收取费用以支付费用。

在正常情况下，您可以充分获取您的信息。但有时候某些法律原因可能要求我们拒绝您的访问，例如有些情况下授予访问权限会干扰他人隐私或造成对保密规定的违反。如果我们拒绝您的访问，我们将向您提供拒绝的书面理由。

我们的宗旨是确保我们准确、完整地掌握您的最新个人信息。如果您的任何细节信息有所变动，请尽快与我们联系。如果我们认为修改理由不充分，我们将在个人信息中添加一条通知以说明您不认同该信息。

如果您希望终止与我们的合作关系，Monex AU 有监管义务将您的个人信息记录保留七年。

隐私问题或投诉

如果您认为您的隐私遭到了破坏或收到损害，请联系我们的隐私官员并提供事件详情以便我们立即开展调查。

我们要求您需以书面形式提出有关侵犯隐私权的投诉，以便我们确定投诉的详细信息。我们将竭力确认您对投诉相关行为的理解以及您期望的结果。我们将告知您我们是否会进行调查、调查人员的姓名、职位和联系方式以及调查过程的预计完成日期。

在询问完成后，我们将主要以书面形式与您联系，告知结果并邀请您回复我们对投诉的结论。如果我们收到您的回复，我们将对其进行评估并告知您我们是否改变了观点。

隐私负责人 – Alex Douglas

Monex Securities Australia Pty Ltd.

注册地址：Level 11, 300 George Street, Sydney NSW 2000

邮政地址：Level 11, 300 George Street, Sydney NSW 2000

电子邮件：complaints@monexsecurities.com.au

电话：+61 2 9103 9600

针对您的投诉，您可直接查询相关的外部争议解决（EDR）方案。

澳大利亚金融投诉机构

GPO Box 3

澳大利亚墨尔本 3001

电话：1800 931 678

电子邮箱：info@afc.org.au

网站：www.afc.org.au

澳洲信息专员办公室（OAIC）

电话：1300 363 992

电子邮箱：enquiries@oaic.gov.au

网站：www.oaic.gov.au

选择退出或取消订阅我们的服务

您无需提供我们可能要求您提供的任何个人信息，但如果不这样做可能导致我们无法打开或维护您的帐户或向您提供服务。我们会尽一切努力确保我们掌握的有关您的所有信息是准确的、完整的、最新的。若您的个人信息发生任何变化，您须及时通知我们。

如果您希望取消订阅有关 Monex AU 产品和服务的任何非帐户特定信息，请与我们联系。

隐私政策的变更

我们可能会不时更改本隐私政策。我们会在网站上向客户和潜在客户提供对隐私政策的所有更新内容。

联系方式

如果您对我们的隐私政策或信息处理有任何疑问，请与我们联系。

如果您希望获得有关隐私的更多信息，您可以访问澳大利亚信息专员（OAIC）办事处网站：www.oaic.gov.au

日期：2020 年 6 月 9 日（版本：3.0）