



## PRIVACY POLICY

**Your privacy is important to us. This statement outlines our policy on how we manage the personal information we hold about our customers, potential customers, shareholders and others. It applies to tastytrade Australia Pty Limited (ABN 61 623 542 696) with its registered address at L17, 123 Pitt St, Sydney, NSW 2000 and its affiliates in Australia. tastytrade Australia is a wholly-owned subsidiary of tastylive, Inc., a company established as a Delaware C-Corporation located in Chicago, Illinois in the United States. tastylive, Inc. is part of the IG Group.**

It is our policy to respect the confidentiality of information and the privacy of individuals. We are bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988.

Our privacy notice 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 it remains appropriate to the changing environment. Any information we hold will be governed by the most current privacy notice displayed on our website(s). This privacy notice was last updated on 9 February 2023.

Any reference to 'us', 'our', 'we' or 'tastytrade' in this privacy notice is a reference to tastytrade Australia Pty Limited as the context requires unless otherwise stated. Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this privacy notice is a reference to any of our customers, potential customers, shareholder and any other persons about whom we collect or hold personal information, as the context requires unless otherwise stated.

### OUR PRIVACY NOTICE IS BASED ON OPENNESS

We are committed to being open and transparent about how we use personal information.

Where our documents or interactions with you ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed.

### WHAT PERSONAL INFORMATION DO WE COLLECT?

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 type of personal information we may collect can include (but is not limited to):

- your name, phone number, street address and email address
- your date of birth, gender, employment details, financial details, domicile and citizenship status
- your bank account details and your tax file number
- demographic information, such as investor type and how you heard about us
- account credentials, such as your user ID and password for our online platform
- if you are acting on behalf of your employer, your job title, your employer's name, and contact information
- if you are applying for a position or contract with us, your education history, qualifications, employment history, membership of professional organisations and referee contact details
- depending on your legal structure, personal information about trustees/beneficial owners, your ABN and insurance details, or other information required by anti-money laundering legislation
- information about your website usage, including information obtained through the use of cookies and other information about your computer, device and browser.

### HOW AND WHY DO WE COLLECT PERSONAL INFORMATION?

We obtain most of the information directly from our customers through applications 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. For example:

- we may collect personal information from public sources (such as registers) or third parties who are entitled to disclose that information to us (such as recruiters)
- we may collect personal information from our corporate clients about different persons within the corporation (e.g., contact persons, directors, managers)
- if you are applying for a position or contract with us, we may collect personal information about you from your referees or our own recruitment suppliers.

We may also ask for other information voluntarily 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.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. Further, if you visit any of our offices or premises, we may have CCTV, which will record your image.

While some contact with us, such as general enquiries, may be made anonymously or by using a pseudonym, this will not always be possible. If you choose not to provide the information, we may not be able to:

- provide you with the requested product or service
- respond to queries or requests that you submit to us
- assess your application for a position or contract with us.

### HOW DO WE USE YOUR PERSONAL INFORMATION AND WHO MAY WE DISCLOSE IT TO, INCLUDING CROSS BORDER DISCLOSURES

Unless you are informed otherwise, the personal information we hold is used and disclosed for the following purposes:

- verifying your identity (including for security purposes and to determine your eligibility for products and services)
- establishing and managing your account;
- providing you with our products and services (including administrative services) or information about those products and services
- complying with our legal and regulatory obligations, including under anti-money laundering legislation
- reviewing your ongoing needs
- responding to your queries or disputes, and enhancing our customer service and products
- sending you surveys as part of our customer feedback process

- forming a profile about you and giving you ongoing information or opportunities that we believe may be relevant to you
- for internal business purposes, including business planning, data analysis, staff training, product development, internal research, corporate re-structuring and record keeping
- performing functions related to our recruitment process
- (unless you opt out) to send you marketing material from time to time that we think will be useful to you (including information from our advertisers and marketing partners).

We may also use and disclose your personal information for other purposes as authorised by you, or in accordance with your requests or instructions.

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

- our staff who need the information to discharge their duties
- other companies within the IG Group (including our parent company tastylive, Inc. in the United States and associated companies) who provide financial and other services for the IG Group and their clients
- our business partners, agents, service providers and specialist advisers who have been contracted to provide us with advice or administrative, IT, financial, regulatory, compliance, taxation, insurance, research or other services
- if you were introduced to us by a third party, we may disclose personal and account information about you to them, their related companies and licensee or authorised representatives
- courts, tribunals and government and regulatory authorities as agreed or authorised by law or our agreement with you
- anyone authorised by you, as specified by you or our agreement with you
- prospective purchasers or all or part of our business or shares in our company or an associated company within the IG group
- if you are referred to us through our Refer a friend program, your referrer may be notified when you apply for an account and when you qualify for a reward.

In some cases, the entities to whom we disclose your personal information may be located overseas and may be subject to different privacy regimes. The countries in which these entities are likely to be located include the United States.

We will take reasonable steps to require that organisations both within and outside the IG group of companies who handle or obtain personal information as service providers to us acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy, and comply with the Australian Privacy Principles (or an equivalent privacy regime) and this privacy notice.

#### UNSOLICITED INFORMATION

If you or a third party provides us with personal information about you that we have not requested, then we will within a reasonable period endeavour to determine whether or not we could have collected the information under this privacy policy and, if not, we will take reasonable steps to destroy or de-identify that information (unless we are otherwise permitted or required to retain by law).

#### MARKETING OUR PRODUCTS AND SERVICES

As noted above, we may use your personal information to let you know about products and services or promotions or other opportunities in which you may be interested.

If you no longer wish to receive such communications you can follow the unsubscribe links in our communications, or phone us on +61 (2) 8317 1402, or write to us at: tastytrade Australia Pty Limited, Level 17, 123 Pitt Street, Sydney NSW 2000, or email: [compliance@tastytrade.au](mailto:compliance@tastytrade.au).

For marketing that you receive as a result of our use of cookies, please see the section dealing with cookies below. In particular please note the information about how to manage your preferences both personally and with any social media websites.

#### OUR WEBSITES, COOKIES AND TECHNOLOGY DEVELOPMENTS

We may also collect personal information you enter when using our website, platform, apps or third party websites. Additional disclosure regarding the use of cookies by the IG Group is set out [here](#).

#### WHAT IS A COOKIE AND HOW DO WE USE COOKIES?

Cookies are small pieces of text created and stored on your computer by websites for record-keeping purposes and to enhance functionality on the website.

We use cookies to:

- set your user preferences and customise your experience
- monitor and gather basic tracking information about your use of our websites (such as date, time of visit, number of visits, usage, and movements around our websites)
- monitor the presentation of our site
- give you access to certain pages of our website(s) or our app(s) without having to log in each time you visit
- to advertise our services to you when you visit other websites that have the necessary functionality.

We may also use independent external service providers to track the traffic and usage on the website(s). Advertisers on our website may also deploy cookies and web beacon technology to measure and improve advertising to their clients.

#### MANAGING COOKIES AND MARKETING

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 our websites or our app(s) if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website. Please note that social media sites such as Twitter and Facebook will require you to manage your cookie preferences directly with them.

#### TECHNOLOGY DEVELOPMENTS

We are constantly striving to improve functionality of our website(s), platforms, apps and any third party websites. This may mean a change to the way in which personal information is collected or used.

The impact of any technology changes which may affect your privacy, will be notified in this privacy notice as it may be updated from time to time

#### LINKS TO THIRD PARTY WEBSITES

Our website(s), platforms, or app(s) may have links to external third party websites that may benefit the user. Please note, however, that third party websites are not covered by our privacy notice and these sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

#### TAX FILE NUMBERS AND SENSITIVE INFORMATION ARE SUBJECT TO GREATER RESTRICTIONS

The way we use tax file numbers (TFNs) (and, if we collect it, sensitive information) may be restricted by law. It is our policy that TFNs (and, if we collect it, 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

We train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal.

Access to records containing Australian TFN information is restricted to individuals who need to handle that information.

We have an appointed Privacy Officer to ensure that our management of personal information is in accordance with this notice, the Commonwealth Privacy Act 1988 and the Privacy (Tax File Number) Rule 2015 (TFN Rule).

#### HOW DO WE STORE PERSONAL INFORMATION?

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium.

We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and, irrespective of the format of the information, take steps to protect the personal information we hold from interference, misuse, loss, unauthorised access, modification or disclosure.

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.

#### HOW DO WE STORE AND SECURE PERSONAL INFORMATION THAT IS HELD ELECTRONICALLY?

As information is more commonly held in electronic form we take our obligations to protect electronically held personal information very seriously. This includes ensuring we meet regulatory guidelines regarding the appropriate levels of information and software security, governance and associated procedures.

#### HOW DO WE KEEP PERSONAL INFORMATION ACCURATE AND UP-TO-DATE?

We endeavour to ensure that the personal information we hold is accurate, complete and up-to-date.

We realise that this information changes frequently with changes of address and other personal circumstances. We can generally update your customer information upon request over the telephone (+61 2 8317 1402), by email to [support@tastytrade.au](mailto:support@tastytrade.au) from your registered email address or online.

If we disagree with your request, we will contact you to inform you of our concerns, giving the reasons for our refusal and notifying you of available options and complaints mechanisms.

#### YOU HAVE THE RIGHT TO CHECK WHAT PERSONAL INFORMATION ABOUT YOU IS HELD BY US

Under the Commonwealth Privacy Act 1988, you have the right to request confirmation of whether we hold any personal information about you, to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy. The Commonwealth Privacy Act 1988 sets 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.

In certain cases, we may charge an administrative fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. We will advise you of the likely cost in advance and can help to refine your request if required.

#### WHAT IF YOU HAVE A COMPLAINT?

If you consider that any action of ours breaches this privacy notice or the Australian 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:

- phone us on +61 2 8317 1402
- write to us at: tastytrade Australia Pty Limited, Level 17, 123 Pitt Street, Sydney NSW 2000, or
- email [compliance@tastytrade.au](mailto:compliance@tastytrade.au)

If you are not satisfied with our response to your complaint, you can contact the Office of the Australian Information Commissioner's via the methods listed at [www.oaic.gov.au/about-us/contact-us](http://www.oaic.gov.au/about-us/contact-us).

#### HOW TO CONTACT US

If you want to:

- make a general enquiry about our privacy notice
- change your personal information
- access your personal information

phone us on +61 2 8317 1402, email us at [compliance@tastytrade.au](mailto:compliance@tastytrade.au) or write to us at:

tastytrade Australia  
Level 17  
123 Pitt Street  
Sydney NSW 2000