
QUAD CODE AU LTD

ACN 131 376 415

AFSL 327075

PRIVACY POLICY



quadcode

Privacy Policy

Introduction

QUAD CODE AU LTD (ACN 131 376 415), is a company incorporated and registered in Australia (referred to in this Privacy Policy as “**Quad Code Markets**”, “**Company**”, “**we**”, “**our**”, “**us**”). This privacy policy and collection statement (hereinafter **Privacy Policy**) aims to give information on how we collect and process any personal data i.e., information about a client (as defined below) who is a natural person based on which that Client can be identified (hereinafter the “**data**”). Quad Code Markets is bound by the *Privacy Act 1988* (**Privacy Act**), including the Australian Privacy Principles (**APPs**) and recognises the importance of ensuring the confidentiality and security of your personal information.

To the extent that it is necessary to do so, Quad Code Markets also complies with the requirements of the EU General Data Protection Regulation (**GDPR**) as adopted by EU Member States. Where an obligation imposed by the APPs and the GDPR are the same, but the terminology is different, Quad Code Markets will comply with the terminology and wording used in the APPs, and this will constitute Quad Code Market’s compliance with the equivalent obligations in the GDPR.

If the GDPR imposes an obligation on Quad Code Markets that is not imposed by the APPs, or the GDPR obligation is more onerous than the equivalent obligation in the APPs, Quad Code Markets will comply with the GDPR.

Please note that this Privacy Policy is addressed to Clients and potential clients. If you are a Quad Code Markets’ employee, a contractor of Quad Code Markets or a third-party service provider, your personal information will be used in connection with your employment contract, your contractual relationship or in accordance with our separate policies which are available by contacting us at the contract details listed in the section our contact details below.

In this Privacy Policy, unless the context otherwise requires, expressions defined herein shall have the meaning ascribed to them in the [Terms & Conditions](#).

If you are participating in our affiliate marketing program, we will process the data provided under our agreement with you to exercise our rights and perform our obligations under or in connection with the relevant agreement and the term Client in this Privacy Policy shall be read to include the term Affiliate.

What kind of personal information do we collect and hold?

We may collect, use, store and transfer different kinds of data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, and middle name or initials (if available), date of birth, gender, passport, identity card, medicare, driver’s license number, and copy of photo.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about the transactions performed by you, details about payments, withdrawals, exchanges, trading history, profit, balance, deposited and withdrawal amount methods, and any other details in relation to the services you have made use of through our website.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in type and versions, operating system and platform, and other technologies on the devices you use to access the Website and use of cookies stored on your device.
- **Profile Data** includes the Client’s account details, username and password, transactions made by you, your interests, preferences, feedback and/or information received through your interaction with us within the course of providing our services and survey responses.

- **Usage Data** includes information about how you use Website, products and services, registration date, account category, trading cluster, number of complaints, number of requests filed and IP history.
- **Marketing and Communication Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Special Categories of Data/ 'Sensitive' Data** includes details about your religious, annual income, biometric data, and/or criminal convictions and offences.
- **Conformity Data** includes details about your education, employment status, trading experience, self-assessment test.
- **Banking Data** includes details of number of payment wallets and/or information of your bank card, including information of the issuing bank, card number, cardholder name, card expiration date, payment system, card validation code (CVV2 / CVC2), and photos of both sides of the bank card.
- **Data in KYC (Know your customer)** includes identity document information, including copies of recent dated Utility Bills, Identity Card, Passport, Medicare and/or Driver's Licence, Tax Identification Numbers (TIN).
- **Economic Profile Data** includes details on annual income, net profit, expected annual amount of investment, sources of funds.
- **Location Data** includes details on your actual location when interacting with the Website (for example, a set of parameters that determine regional settings of your interface, namely residency country, time zone, and the interface language)
- **Audio Data** includes full voice recordings of calls that you receive from us or make to us.
- **Aggregated Data** includes statistical or demographic data for any purpose. Such data can be derived from your data but may not be considered personal data in law as it will not directly or indirectly reveal your identity. An example of such Aggregated Data could be that we aggregate your Usage Data to calculate the percentage of users accessing a specific website feature and/or services/product preference. Notwithstanding the above, if Quad Code Markets combines Aggregate Data with data in a way that the result can in any way identify the data subject, Quad Code Markets shall treat such combined data as data which will be treated as per the provisions herein contained.

How do we collect personal information?

We use different methods to collect data from and about you including through:

Direct Interactions. You will provide to us your Identity, Contact and Financial Data online through the Website and/or by filling in online forms and/or by corresponding with us by emails or otherwise. Data may be submitted to us by you when you wish to:

- a. Register for a Trading Account;
- b. Register for a Demo Account;
- c. Subscribe to our publications and ongoing updates;
- d. Request marketing and promotions to be sent to you;
- e. Enter a competition, promotion, or survey;
- f. Give us feedback or subscribe or request to receive notification for new products, features and or updates; and
- g. Contact us for any request.

We require to collect the above data in order that we can (i) provide our services efficiently, (ii) to comply with our ongoing legal and regulatory obligations, including, inter alia, (a) to prevent fraud and money laundering acts and/or (b) conduct the assessment of suitability and appropriateness test.

If you fail to provide the data when requested we may not be able to perform the contract we have or trying to enter with you (for example, to provide you with our services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time. It is important that the data we hold about you is accurate and current. Please keep us informed if your data changes during your relationship with us.

Automated Technologies or Interactions. When using our services, your device automatically transmits to us its technical characteristics. Locale (a set of parameters that determine regional settings of your interface, namely, residence country, time zone and the interface language) is used for the purpose of providing you with the best possible service within our platform.

Using the information about IP address, cookies files, information about browser and operating system used, the date and time of access to the site, and the requested pages addresses allows us to provide you with the optimal operation on our web application, mobile and/or desktop versions of our application and monitor your behaviour for the purpose of improving the efficiency and usability of our Services.

We use web analytics tools to track performance of our website and marketing source of user by cookies to optimize our marketing costs and provide users with better experience.

You may at any time request that we refrain from any such transmissions (to the degree this is possible and subject to any of our legal obligations) by sending your request to the data privacy officer using our contact details below using the registered email address you disclosed and registered with us through your Account. We will address your request within 30 business days.

About Cookies:

A cookie is a small amount of data that often includes a unique identifier that is sent to your computer or device browser from a website's computer and is stored on your device's hard drive for tracking site usage. A website may send its own cookie to your browser if your browser's preferences allow it, but to protect your privacy, your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other websites. Many websites do this whenever a user visits their website to track online traffic flows. When you visit our website, our system automatically collects information about your visit, such as your Technical Data, including inter alia to, your browser type, your IP address, and the referring website.

Cookies stored may determine the path the Client took on our site and used to anonymously identify repeat users of the website and what pages were most popular for Clients. However, the Company protects the Client's privacy by not storing the Client's names, personal details, emails, etc. Using cookies is an industry standard and is currently used by most major websites. Stored cookies allow the Website to be more user-friendly and efficient for Clients by allowing Quad Code Markets to learn what information is more valued by Clients versus what isn't. You can set your browser not to save any cookies of this website and you may also delete cookies automatically or manually. However, please note that by doing so you may not be able to use all the provided functions of our website in full and you may not be able to use our website and Services.

Please see our [Cookie Policy](#) for further details.

Why do we collect and hold personal information?

We process the aforementioned data in compliance with the provisions of the APPs, the Privacy Act, GDPR and the applicable local legislation as amended from time to time in order to (i) be able to perform our contractual obligations towards the Client and offer them the best possible service, (ii) provide our Services efficiently, (iii) comply with our legal and regulatory obligations, including, inter alia, (a) to prevent fraud and money laundering acts and/ or (b) conduct the assessment of suitability and appropriateness test, and (iv) to protect our legitimate interests and your vital interests.

Processing of your data is carried out by Quad Code Markets following the principles of lawfulness, fairness, transparency and always adhering to the intended purpose of data processing, the principle of data minimization, accuracy, limited data storage, data integrity, confidentiality, and accountability.

We process all data based on the following legal basis:

1. For compliance with our legal and regulatory obligations.
2. For the performance of our contractual obligations towards the Client.

3. For the purposes of safeguarding our legitimate interests and your interests and fundamental rights do not override those interests; and/or
4. Based on your consent.

Indicatively we set out below a description of all the ways we plan to use your data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process the data for more than one lawful ground depending on the specific purpose for which we are using your data.

-	Purpose of activity.	Type of data	Lawful basis for processing including basis of legitimate interest.
a.	<ol style="list-style-type: none"> 1. To accept to register you as a client 2. To notify you about changes to our terms or privacy policy 3. To communicate with you and provide you with secure identifications, authentication, and support services 4. To confirm you are at age of majority as recognized and declared by the laws of your jurisdiction 	<ol style="list-style-type: none"> 1. Identity Data 2. Profile Data 3. Contact Data 4. Data in KYC 5. Financial Data 6. Economic Profile Data 	<ol style="list-style-type: none"> 1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations
b.	<ol style="list-style-type: none"> 1. To perform our Scoring Processing under which a client is scored on a scale basis regarding the level of risk he is to Quad Code Markets 	<ol style="list-style-type: none"> 1. Banking Data 2. Economic Profile Data 	<ol style="list-style-type: none"> 1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations
c.	<ol style="list-style-type: none"> 1. To confirm the information provided by You under (a) above in relation to your location. 	<ol style="list-style-type: none"> 1. Location Data 	<ol style="list-style-type: none"> 1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations
d.	<ol style="list-style-type: none"> 1. To secure authentication, identification and support services via social networks protocols and use the links to your accounts in social networks for these purposes. 	<ol style="list-style-type: none"> 1. Technical Data 	<ol style="list-style-type: none"> 1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations
e.	<ol style="list-style-type: none"> 1. To confirm your source of funds and levels of income and level of trading risk. 	<ol style="list-style-type: none"> 1. Economic Profile Data 2. Conformity Data 	<ol style="list-style-type: none"> 1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations
f.	<ol style="list-style-type: none"> 1. To process and deliver your transactions and requests (Deposits; Trades; Withdrawals) 2. Manage payments, fees, and charges. 3. To collect and recover money owed to us. 	<ol style="list-style-type: none"> 1. Banking Data 2. Transaction Data 	<ol style="list-style-type: none"> 1. Necessary to perform our contract with you 2. Necessary for our legitimate interest (recover charges owed to us, make a refund in case of breach of our contract)

g.	1. To administer and protect our business and Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	1. Identity Data 2. Contact Data 3. Technical Data	1. Performance of our contract with you 2. Necessary to comply with our legal obligations 3. Necessary for our legitimate interests (take reasonable steps to confirm that you do not use any ways to manipulate our platform & for running our business, provision of administration and IT services, network security, to prevent fraud)
h.	1. To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you 2. To provide you with an optimal operation on our web application, mobile and/or desktop versions of our application and monitor your behavior for the purpose of improving the efficiency and usability of our services. 3. To offer best customer experience.	1. Identity Data 2. Contact Data 3. Profile Data 4. Usage Data 5. Technical Data 6. Marketing and Communication Data	1. Necessary to perform our contract with you 2. Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business)
i.	1. To study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy.	1. Transaction Data	1. Necessary for our legitimate interests (including statutory limitations provisions by applicable laws)
j.	1. To inform you about any of the following: — New services and/or products we may offer. — Any new development and/or features of the current products/services we offer for better experience as user of the platform/services.	1. Identity Data 2. Profile Data 3. Contact Data 4. Technical Data 5. Usage Data 6. Transactions 7. Marketing and Communication Data	1. Necessary to perform our contract with you 2. Necessary for our legitimate interests (to study how customers use our products/services, to develop our products/services and grow our business)
k.	1. To send direct marketing of our services to you always within the boundaries of our legitimate interests. 2. To send to you newsletters, push-messages and calls to keep you in touch with our new feature and new development of the current products/services we offer, news and events and the efficient provision of the full scope of our services. Please note that we will never use your data to communicate to	1. Identity Data 2. Profile Data 3. Contact Data 4. Data that may be provided by you during your activity at the Website. 5. Marketing and Communication Data	1. Necessary to perform our contract with you 2. Necessary for our legitimate interests (to provide effective and personalized customer services to you and to update you in relation to our services that are available to you.

	you and/or promote any third-party marketing material.		
l.	<ol style="list-style-type: none"> 1. To allow us to provide you with the optimal operation on our website, mobile and desktop versions of our application and monitor your behavior for the purpose of improving the efficiency and usability of our Services. 2. To use analytics tools to track performance of the Website and marketing source of our clients to optimize our marketing costs and provide you with better experience. 	<ol style="list-style-type: none"> 1. Location Data 2. Technical Data 3. Usage Data 4. Marketing and Communication Data 	<ol style="list-style-type: none"> 1. Necessary to perform our contract with you 2. Necessary for our legitimate interests (to provide effective and personalized customer services to you and to update you in relation to our services that are available to you).
m.	<ol style="list-style-type: none"> 1. To allow us to monitor and train our employees for your benefit 2. To safeguard your or our interests in case of a dispute 3. To take steps for fraud prevention 4. To improve the services provided to you 	<ol style="list-style-type: none"> 1. Audio Data 	<ol style="list-style-type: none"> 1. Necessary to perform our contract with you 2. Necessary to comply with our legal obligations 3. Necessary for our legitimate interests

You may ask us to provide an alternative means of identity verification for the purposes of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

If you are an existing Client of the Website where we have a legitimate interest in communicating with you, or if you have given us your consent, we will collect and process your personal data to communicate with you in case of support and/or sending newsletters, push-messages and calls to keep you in touch with our new features, news and events and the efficient provision of the full scope of our services. We will also use your data to send you marketing information regarding our services that we believe may be of interest to you via email or otherwise.

Our website is not intended for children, and we do not knowingly collect data relating to children. As we do not allow users under the age of 18 to use our services, we need to obtain your birth date to confirm the Clients' age checks.

Who might we disclose personal information to?

We may disclose personal information to:

- a related entity of Quad Code Group (as defined below) to provide us with the relevant services. In general, your data is used by the processors of the Quad Code Group.
- an agent, contractor, or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, debt collectors or other advisers.
- organisations who, on our behalf, operate, maintain and/or support our IT systems and IT infrastructure, our websites, perform statistical analysis, marketing and advertising purposes,

sending newsletters, provide customer support services and perform other important services for us.

- organisations involved in managing payments, including payment merchants and other financial institutions, such as banks.
- regulatory bodies, government agencies, law enforcement bodies and courts.
- anyone else to whom you authorise us to disclose it or is required by law.
- Quad Code Markets is required under the Corporations Act 2001 to make certain information available for inspection, on request to ensure ongoing compliance with licensing and regulatory requirements. This may involve the disclosure of Personal Information. Quad Code Markets may also collect personal information from its suppliers to complete business transactions and services; and
- where disclosure is necessary to achieve the purpose(s) for which, it was collected, data may also be disclosed in special situations, where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring or interfering (intentionally or unintentionally) with our rights or property, users, or anyone else who could be harmed by such activities, or otherwise where necessary for the establishment, exercise or defense of legal claims.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues, and we will make third parties aware of this Privacy Policy.

Contractual arrangements with third parties

We ensure that all contractual arrangements with third parties adequately address privacy issues, and we make third parties aware of this Privacy Policy.

Third parties will be required to implement policies in relation to the management of your personal information in accordance with *the Privacy Act*. These policies include:

- regulating the collection, use and disclosure of personal and sensitive information.
- de-identifying personal and sensitive information wherever possible.
- ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties; and
- ensuring that the personal and sensitive information is only disclosed to organisations which are approved by us.

International Transfers

The Quad Code Group of companies is active across the world, we have offices and entities located in Gibraltar, Cyprus, the United Kingdom, and the UAE (together with their respective affiliated entities) (collectively referred to us the “**Quad Code Group**”). For this reason, in some circumstances, we may disclose personal information to other Quad Code Group and/or third-party service providers that are located outside Australia.

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act and the APPs.
- the recipient is subject to an information privacy scheme like the Privacy Act.
- the individual has consented to the disclosure.

- the transfer is necessary for the performance of a contract between the individual and the Company, or the implementation of a pre-contractual measures taken in response to the individual's request.
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between the entity of the Quad Code Group and a third party.
- the transfer is necessary or legally required on important public interest groups or for the establishment, exercise, or defense of legal claims.
- the transfer is required by law.
- the transfer is necessary to protect the vital interests of the individual.
- the transfer is made under a data transfer agreement; or
- the transfer is otherwise legitimised by applicable law.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the APPs, we will not be accountable for that breach under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

If you want to obtain further information on any data transfers mentioned above, please contact us using the registered email address you disclosed and registered with us through your Account using the points of contact listed in the Section our contact details below.

Data Retention

We store your data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for your data, we consider the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, and other requirements.

By law we must keep your data (including call recordings) during our business relationship and upon its termination, for a minimum period of up to 7 (seven) years from the date of termination or by the user of the Platform/Service they are using. The data storage period may be extended upon the request of the competent authority (regulator of the Company's licenced activities).

In general, all other data is stored for a period of 30 (thirty) business days after the date of termination of the provision of our services unless there is any other legal or regulatory reason to keep it.

At the expiration of the data retention period the data is erased by irreversible destruction, and we also inform all third parties, to whom the data was transferred, regarding such erasure and request implementation of similar actions on their part.

Management of personal information

We recognise the importance of securing the personal information of our clients. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification, or disclosure. We limit access to your data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data breach and will notify you and the competent regulator of a breach where we are legally required to do so.

Your help is always valuable in ensuring that your data is kept safe. Upon registration to Website (or its mobile version), the Client will be asked to choose a username and password to be used by the Client on each future login and for the performance of transactions and use of the Company's Services. To protect the Client's privacy and operation with Website, sharing registration details (including without limitation, username, and password) by the Client with other persons or business entities is strictly prohibited. The Company shall not be held responsible for any damage or loss caused to the Client due to improper use (including prohibited and unprotected use) or storage of such username and password, including any such use made by a third party, and whether known to or authorized by the Client.

Any use of Website with the Client's username and password is Client's sole responsibility. The Company shall not be held responsible for any such use, including for validation that Client is operating in his/her account.

The Client is obliged to forthwith notify the Company's client service of any suspicion for unauthorized use of the Client's account. You may contact us at any time through the points of contact listed in the Section our contact details below.

Encryption of your data in transit. Encryption provides a high level of security and privacy for your data. When you enter your data in our platform, we use strong encryption technologies (such as Transport Layer Security) to protect your data during transmission from your devices to our servers.

For providing more trust and security we use digital EV (Extended Validation) Certificates issued by trusted Certificate Authorities. You can see the 'Green Bar' in the supported browser versions which confirms what all transmitted data is secure.

Protection of your data in our infrastructure. We make it a priority to develop services that are secure "by default". The "default" security of our services means that every new service and feature is designed with strict security requirements in mind before we even begin development. This is the key to guaranteed protection and privacy of all data that our services handle and store, once the service or new feature is released.

To secure your data, we use the pseudonymisation which allows most of our services to operate without using your actual data. Instead of that, our services use a system ID that can't be traced back to identify you.

The Company is always vigilant about the security of your data stored in our infrastructure. Because of that we locate all our equipment which used for your data processing in secure data centers. Network access to this equipment is isolated from the Internet. We use network segmentation for isolation of services which need different level of security from each other. In addition, we restrict logical access to your data for our employees on "need to know" basis. So, only personnel, who really requires access to your data for the purpose of providing you with our best service, will have access to it.

Threats protection. Our Company is highly knowledgeable about modern threats to data security and privacy, and we are well prepared to combat them. All events that occur in our infrastructure are continuously monitored, analysed, and responded, which allows us to ensure proper protection of your data, keeping it safe from threats, vulnerabilities, and the effects of malware.

In the event of a failure that affects the accessibility of your data, we have data backup and recovery procedures in place that will us help to restore your data in short time. For guarantee the quick recovery we use high availability mode enabled for most critical databases which allows us to minimize downtime.

Employee awareness of data security. Our employees may handle your data in order to provide you with the first-class service. To guarantee the security and confidentiality of your data, we monitor all employees' actions with access to your data in our systems and grant access strictly on a "need to know" basis: only employees who need access will receive it. We hold regular training sessions to make sure that each employee understands the principles that the Company follows to achieve robust data security and privacy.

If you choose not to give your personal information. In the context of our business relationship, we may need to collect data by law, or under the terms of a contract we have with you. Without this data, we are, in principle, not in a position to close or execute a contract with you.

If you choose not to give us this data, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts or policies.

To what extent we carry automated decision-making and profiling. In establishing and carrying out a business relationship, we generally do not use automated decision-making. If we use this procedure in individual cases, we will inform you of this separately. In some cases, we may proceed with profiling to evaluate certain personal aspects. We shall inform you accordingly in case we perform any profiling. In general, any data collection that is optional would be made clear at the point of collection.

Direct marketing

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information; and
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- we provide a simple way of opting out of direct marketing and or other notifications for updates; and
- you have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period.

If you don't want to receive any marketing newsletters or transmit your data to the third parties for marketing purposes, you can configure your preferences. Such configuring can be done when (i) opening an account or (ii) when receiving such advertising content or (iii) by logging in and going to My Account > Personal Details > Notification Settings. You may also send to the Company, at any time, an email to support.au@quadcodemarkets.com using the registered email address you disclosed and registered with us through your Account, asking the Company to cease from sending such advertising content or sending your data to the third-parties for marketing purposes. The aforesaid mark removal and/or e-mail received by Quad Code Markets will oblige us to cease sending advertisement content to you within 7 (seven) business days.

How do we keep personal information accurate and up to date?

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up to date.

We ask you to provide us with true, accurate and updated information on your identity and not misrepresent yourself to be another individual or legal entity. Any changes in your personal identifying details shall be notified to the Company immediately and in any case no later than 7th day from the date of such change. If your data is incorrect or incomplete, please contact our support service at the

contact details listed in the section our contact details below to change your data. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

Accessing your personal information

Subject to the exceptions set out in the Privacy Act, you may gain access to the personal information that we hold about you in the 'Access my data' section in your personal cabinet, accessible by logging onto your account clicking to the 'Personal Data' option and at the bottom of the page you can proceed with your request by selecting 'Access my data'. Alternatively, you can access your data by contacting us at our contact details below. We will provide access within 30 days of the individual's request. If we refuse to provide the information, we will provide reasons for the refusal. We will require identity verification and specification of what information is required.

Our Contact Details

Who is responsible for the data processing and who you can contact.

The entity responsible for your data processing is Quad Code Au Ltd and you can contact us using the details set out below:

Suite 23.03, Level 23, 259 George Street, Sydney NSW 2000.

Email: support.au@quadcodemarkets.com

Privacy Officer

We have appointed a data privacy officer (hereinafter **Privacy Officer**) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this privacy policy, including requests relating to the data, please contact the Privacy Officer using the details set out below:

Quad Code Au Ltd

Suite 23.03 Level 23, 259 George Street, Sydney NSW 2000

You can contact our support team from the registered email address you disclosed and registered with us at email: dpo.au@quadcodemarkets.com.

Links to other websites

We may provide links to third party websites in our website. These linked websites are not under our control, and we therefore cannot accept responsibility or liability for the conduct of third parties linked to our websites, including without limitation to the collection or disclosure of your data. Before disclosing your data on any other website, we encourage you to examine the terms and conditions of using that website and its privacy policies.

Making a complaint

We do our best to ensure that we protect your data, keep you informed about how we process your data and comply with the Privacy Act. In case you are not satisfied with the processing and protection of your data or the information you have received from us, then we urge you to inform us for us to improve.

The complaints handling process involves:

- identifying (and addressing) any systemic/ongoing compliance problems.
- increasing consumer confidence in our privacy procedures; and

- helping to build and preserve our reputation and business.

If you have any questions about this Privacy Policy, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with us by:

- Quad Code Au Ltd
Suite 23.03, Level 123 259 George Street, Sydney NSW 20060
You can contract our data privacy officer from the registered email address you disclosed and registered with us at: dpo.au@quadcodemarkets.com.

To enable us to process your request, please contact us using the registered email address you disclosed and registered with us through your Account. We may require that you provide us with proof of your identity, such as by providing us with a copy of a valid form of identification. This is to ensure that we appropriately protect the personal data we hold from unauthorised access requests and comply with our security obligations.

We try to respond to all legitimate requests within one month. Occasionally it could take longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner by:

- Telephoning – 1300 363 992
- Writing – Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001
- Emailing – enquiries@oaic.gov.au

Your rights

Under certain circumstances, you have rights in accordance with the provisions of GDPR and the applicable local legislation as amended from time to time. Some of the rights are rather complex and include exemptions, thus we strongly advise you to contact us (at the contact details listed in the section our contact details below) and/or seek guidance from the regulatory authorities for a full explanation of these rights. You can find a summary of your rights below in this section.

A. The right to access. You have a right to obtain the confirmation as to whether your data is being processed by us. To access and view your data without downloading it, please go to the 'Access my data' in your personal cabinet, by logging onto your Account, go to **personal data** and at the bottom of the page you can proceed with your request by selection - **Access my Data**. In addition, you have a right to obtain more detailed information about the data kept and the processing undertaken by us and under certain circumstances the right to receive a copy of this data.

B. The right to rectification. You have the right to have inaccurate data about you rectified, and, considering the purpose of the processing, to have incomplete data completed. We ask you to provide us with true, accurate and updated information on your identity and not misrepresent yourself to be another individual or legal entity. Any changes in your identifying details shall be notified to the Company immediately and in any case no later than the 7th day from the date of such changes. If your data is incorrect or incomplete, please rectify by logging onto your Account in your **personal data** via our website and/or contact our support service at the contact details listed in the section our contact details above to change your data.

C. The right to erasure. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Please note however that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. In case if you want to obtain complete erasure of your data (to apply the “right to be forgotten”), please note that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of

your request. To Delete your Account and all the personal data currently stored in our system you can do so, by logging into your Account go to **personal data** section and then **Account Settings** and at the Bottom of the Page you can proceed with your request by selecting- Terminate Account – **Delete My Account and all its data**.

D. The right to restriction of processing. You have the right to request the restriction of processing of your personal data (a) if it is not accurate;(b) where processing may be unlawful but you do not want us to erase your data; (c) where you need us to hold the data even if we no longer require it; or (d) where you may have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

E. The right to data portability. To the extent the legal basis for the processing is your consent, and such processing is carried out by automated means, you have the right to receive your data in a structured, commonly used, and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others and/or in case it may be technically impossible to do so.

F. The right to object. Subject to the legal basis on which the processing activity is based, you may object to processing of your personal data. Please note that in some cases, we may have compelling legitimate grounds to process your information which we need to comply with.

G. The right to withdraw consent. To the extent that the legal basis for the processing is your consent, you have the right to withdraw from that consent at any time. This may apply to marketing purposes and/or with regards to the transfer of your data to third parties. In case you withdraw from a consent given, then we will cease to process your data, unless and to the extent the continued processing is permitted or required according to the applicable data regulation or other applicable laws and regulations. The withdrawal from your consent will in no event affect the lawfulness of processing based on consent before its withdrawal.

H. The right to complain to the data protection supervisory authority. We do our best to ensure that we protect your data, keep you informed about how we process your data and comply with the applicable data protection regulation. In case you are not satisfied with the processing and protection of your data or the information you have received from us and/or you want to complain about a breach of the Privacy Act, including the APPs, then we urge you to inform us for us to improve. Please also do not hesitate to contact us if you want to make use of your rights.

If you want to exercise any of your rights mentioned above and/or obtain more information regarding your rights and/or our policies and procedures, please contact us through the points of contact listed in the Section our contact details above. Please also provide us with relevant information to take care of your request, including your full name and email address so that we can identify you. We will respond to your request without undue delay.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

We may charge you a reasonable administrative fee for any unreasonable or excessive requests we may receive, and for any additional copies of the data you may request.

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Updates to this Privacy Policy

This Privacy Policy was last updated 03 July 2023. We have the right, at our discretion, to add, modify or remove portions of this Privacy Policy from time to time to ensure that the information herein provides relevant and adequate information about our collecting and processing of your data.

This privacy policy may be supplemented by other information received from the Quad Code Group and other terms and conditions applicable to the Website or which you have agreed to as part of your interaction with us.

In case of updates, we will post the revised Privacy Policy on our website. Changes will take effect as soon as the revised version is made available on our website. Your comments and feedback are always welcome. You may contact us at any time through the points of contact listed in the Section our contact details above.

@Quad Code Markets

Updated 03/07/2023

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