

# Cambridge Mercantile (Australia) Pty Ltd Privacy Policy, 1.1

This Privacy Statement is made on behalf of Cambridge Mercantile (Australia) Pty Ltd ACN 126 642 448 AFSL 351278. All references to “Cambridge”, “we”, “us” or “our” in this privacy statement are references to Cambridge Mercantile (Australia) Pty Ltd.

This Privacy Statement was last modified on May 11, 2018

## Privacy Policy

Cambridge is committed to protecting your privacy and to compliance with the:

- Privacy Amendment (Private Sector) Act 2000 (NPPs)
- Privacy Amendment (Enhancing Privacy Protection) Act (APPs)
- Corporations Act 2001
- Anti-Money Laundering and Counter-Terrorism Act 2006

If you have any questions relating to this privacy statement or your privacy rights please contact us.

This privacy statement sets out Cambridge’s policy for handling and protecting your personal information. We are committed to ensuring the privacy of your information and recognise that you, as a customer, are concerned about your privacy and about the confidentiality and security of information that Cambridge may hold about you.

Cambridge is required to meet particular legislative and regulatory requirements. In order to provide the following designated services to you, we are required to collect certain personal information from you.

- Providing you with the relevant product or service
- Managing and administering the product or service
- Protecting against fraud

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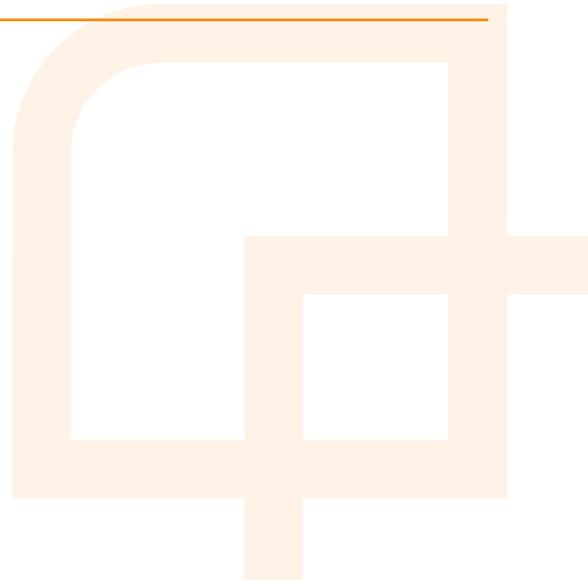


## Collection

<p><b>The information we collect</b></p>	<p>The information we collect from you will depend on what services we provide to you and may include the following:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> your name, address and contact details;</li> <li><input type="checkbox"/> your e-mail address;</li> <li><input type="checkbox"/> your tax file number;</li> <li><input type="checkbox"/> bank account details;</li> <li><input type="checkbox"/> identification and verification information; and</li> <li><input type="checkbox"/> details of specific transactions.</li> </ul>
<p><b>Where we collect information</b></p>	<p>In most instances information about you will be collected from you in our application form. We may also collect information about you from our website but the information collected on the website will only identify who you are if you provide us with your details (e.g. if you e-mail your contact details to us).</p> <p>When you visit our website our, web server collects the following types of information for statistical purposes:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> your internet service provider address;</li> <li><input type="checkbox"/> the number of users who visit the website;</li> <li><input type="checkbox"/> the date and time of each visit;</li> <li><input type="checkbox"/> the pages accessed and the documents downloaded; and</li> <li><input type="checkbox"/> the type of browser used.</li> </ul> <p>No attempt is made to identify individual users from this information.</p> <p>The Cambridge website may contain links to the websites of third parties. If you access those third party websites, they may collect information about you. Cambridge does not collect information about you from the third parties without prior express consent. You would need to contact the third parties directly to ascertain their privacy standards.</p> <p>You have a right to refuse us authorisation to collect information from a third party.</p>

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<p><b>Sensitive information</b></p>	<p>Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.</p> <p>This subject to some expectations, including:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> when the collection is required by law; and</li> <li><input type="checkbox"/> when the information is necessary for the establishment, exercise or defence of a legal claim.</li> </ul> <p>Personal information will be treated as confidential information, and sensitive information will be treated as highly confidential.</p>
<p><b>Anonymous</b></p>	<p>You can deal with us anonymously or by using a pseudonym where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.</p>
<p><b>Cookies</b></p>	<p>A cookie is a piece of data that identifies you as a unique user. We may use cookies to store visitors' preferences and record session information. Cookies may be accessed later by our web server. Cookies store information about your use of our website. Cookies also allow us to provide you with more personalised service when using our website.</p> <p>Cambridge uses cookies to:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> determine whether you have previously used the Cambridge website;</li> <li><input type="checkbox"/> identify the pages you have accessed; and</li> <li><input type="checkbox"/> facilitate administration of the site and for security purposes.</li> </ul> <p>Most web browsers are set to accept cookies but you may configure your browser not to accept cookies. If you set your browser to reject cookies you may not be able to make full use of all of the features of the Cambridge website.</p> <p>See <a href="https://cookiesandyou.com/">https://cookiesandyou.com/</a> to learn what cookies are and how to disable them.</p>

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## Uses and disclosures

We will only use or disclose the information collected about you for the purpose for which it was collected, or related purposes for which you would reasonably expect us to use or disclose the information, or where you have consented to us using or disclosing the information.

We may use your personal information to:

- provide you with financial services;
- respond to any specific requests you may make of us;
- notify you of any products that may be of interest to you;
- audit and monitor the services we provide to you;
- update your personal files; and
- enable us to meet our obligations under law, for example, the Anti-Money Laundering and Counter Terrorism Financing Act 2006, and Australian taxation laws.

We may disclose your personal information to:

- our associates, agents, contractors or third party service providers to enable them to provide administrative and other support services to us; and
- where the disclosure is required by law, for example to government agencies and regulatory bodies as part of our statutory obligations, or for law enforcement purposes.

Please be aware that we may maintain and process your personal information outside of your country of residence. As such, your data is subject not only to local legal and regulatory requirements, but also to legal and regulatory requirements of those other foreign countries. For example, there are sometimes lawful requirements to disclose nonpublic personal information to government authorities in certain countries, including but not limited to the United States, Canada and the UK.

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<p><b>Not providing your personal information</b></p>	<p>If you provide inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking.</p>
<p><b>Email addresses and telephone numbers</b></p>	<p>If you provide us with your e-mail address during a visit to our website, then it will be used only for the purpose it was provided to us. It will not be added to a mailing list without your consent unless the mailing list is related to the purpose for which you provided your e-mail address to us. We may use your e-mail address, for example, to provide you with information about a particular service or to respond to a message you have sent to us.</p> <p>If you subscribe to one of our services and provide your e-mail address to us so that we may communicate with you through e-mail, we may also use your e-mail address to advise you of upgrades and changes to those services. By providing us with your telephone number, we may contact you from time to time with reference to products, services or forthcoming events.</p> <p>Please let us know if you do not want to receive any future communications from us by contacting us in writing using the contact details below. We maintain a register for those individuals not wanting direct marketing material.</p>
<p><b>Cambridge contractors</b></p>	<p>Cambridge may use third party service providers to maintain some of our data systems and provide auxiliary services. We require any party that has access to personal information to conform to our privacy standards.</p>

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<b>Security and retention policies</b>	<p>Cambridge is committed to ensuring the security of information that we hold about you. We take all reasonable steps to ensure that the information we hold about you is stored securely, whether in a physical or electronic form.</p> <p>If you use the internet to communicate with us, you should be aware that there are inherent risks in transmitting information over the internet. Cambridge does not have control over information while in transit over the internet and we cannot guarantee its security.</p> <p>It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for a minimum of 7 years.</p> <p>In the event of that we explore an opportunity to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Disclosure will be made in confidence, and it will be a condition of that disclosure that no personal information will be used or disclosed by them.</p>
<b>Your consent and changes to the Privacy Policy</b>	<p>Upon using this website and our services, you consent to our use and collecting of your information as it appears within this policy. Although this is not our immediate intention, periodically, we may utilise this customer information for an unforeseen use that has not been disclosed within this current privacy statement. If at any time in the future our information practices change in the future, we will amend our privacy statement on this website. Should you have any immediate concerns about how your information is being used, you should check our website to ensure you are up to date with our current policy or contact us.</p>

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## Access and correction

We try to ensure that all information that we collect about you, use, or disclose, is accurate, complete and up-to-date. You may at any time request access to the personal information that we hold about you. If there is an error with our information or our information is incomplete, you can advise us and we will, if needed, correct or add information.

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information, we'll determine whether or not it would have been permissible to collect that personal information if it had been solicited. If we determine that collection would not have been permissible, to the extent permitted by law, we will destroy or de-identify that personal information as soon as practicable.

We will not charge you a fee for your access request, but may charge you the reasonable cost of processing your request.

Some exceptions exist where we will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information is related to existing or anticipated legal proceedings between us;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law; and
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

If you would like to request access to the information we hold about you, please contact us.

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## Disputes

If you have a complaint about our treatment of your privacy, please contact us. We will investigate your complaint and endeavour to resolve any issue to your satisfaction.

If we do not adequately answer your concerns, you have the right to make a complaint to the Office of the Australian Information Commissioner by telephoning 1300 363 992 or go to [www.oaic.gov.au](http://www.oaic.gov.au).

## Contact details of Cambridge Mercantile (Australia) Pty Ltd

Our address for all postal communications is:

Cambridge Mercantile (Australia) Pty Ltd  
Suite 2, level 13/35 Clarence Street  
Sydney NSW 2000

You can also contact us via email at [privacy@cambridgefx.com](mailto:privacy@cambridgefx.com)

Or call us direct on +612 80765 6500 between the hours of 9am - 5pm AEST

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