

## PRIVACY POLICY

### 1. GENERAL STATEMENT

Fullerton Markets Limited (hereinafter called the "Company") is an entity incorporated in New Zealand with the following registrations: Company Number 5810357, NZ Business Number 9429041986592, Financial Services Provider Number FSP477046, Financial Services Complaints Ltd Number 6292. The Company complies with all applicable laws and regulations in New Zealand.

The Company understands that confidentiality and security of your personal information is important. That is why we have developed specific policies and practices designed to protect the privacy of your personal information.

By opening an account with the Company or by utilising the products and services available through the Company, you have consented to the collection and use of your personal information in accordance with the privacy notice set forth below. We encourage you to read this privacy notice carefully.

### 2. PRIVACY NOTICE

**The Company does not sell customer lists or customer email addresses to third party marketers.**

In order to provide brokerage services and to comply with regulatory requirements, the Company collects certain personal, non-public information from you. This includes information:

- Provided during the account application process (e.g., your name, e-mail address, telephone number, birth date, social security number, investment objectives, etc.);
- Acquired as a result of the transactions you conduct through the trading system;
- Received from consumer-reporting agencies;
- Collected through Internet "cookies."

Cookies are bits of textual information that are sent electronically from a web server to your browser and are stored on your computer. They do not identify you individually or contain personal information about you, unless you have identified yourself or provided the information by, for example, opening an account or registering for an online service. The Company may use cookies to measure and identify website traffic patterns and to track the performance of web features and advertisements. By providing the Company with a better understanding of how you and others use the Company's website and other web services, cookies enable the Company to improve the navigation and functionality of its website and to present you with the most useful information and

offers. The Company may share information obtained from cookies with its employees, agents, and affiliates, but does not sell such information to unaffiliated third parties. The Company may permit other companies or their third party ad servers to set cookies on your browser when you visit the Company's website. Such companies generally use these cookies as we do. We also use cookies to improve the performance of our advertising on other websites. From time to time, we may use third party vendors, such as Google and DoubleClick, to display our ads over the internet to you, based on your previous use of our website.

### **3. CLIENT CONFIDENTIALITY**

**The Company safeguards the confidentiality of your information in a number of ways.**

For example:

- We do not sell or license lists of our customers or the personal, nonpublic information that you provide to us.
- We restrict access to the personal, non-public information that you have shared with us to the Company's employees, agents and affiliates who need to know such information in connection with the services that the Company provides to you.
- We maintain strict employment policies that prohibit employees who have access to your personal, non-public information from using or disclosing such information except for business purposes.
- We take substantial precautions to safeguard your personal, non-public information. For example, the Company's system can only be accessed by authorised personnel via valid user names and passwords. In addition, our Internet-based systems include security measures such as encryption and firewalls.

We do not disclose personal, non-public information to individuals or entities that are not affiliated with the Company, except as provided by law. For example, among other reasons, we may disclose or report such information: where necessary to authorise, effect, administer or enforce transactions that you request or authorise; to maintain and administer your account; to provide you with account confirmations, statements and records; to maintain appropriate archival records; where we believe that disclosure is required by applicable law, rules or regulations; to cooperate with law enforcement, regulatory or self-regulatory organisations; to enforce our customer and other agreements; to meet our obligations; or to protect our rights and property. As long as consistent with applicable securities laws and regulations, we may share anonymised account information or anonymised delayed order information with third parties (and/or share such information among our affiliates) for the purpose of analysis, research, market data compilation, product creation, establishing order routing and execution relationships, or for any other lawful purpose.

Finally, if you choose to subscribe to any of the Company's suite of third-party services that are provided through the Company's website, we may disclose such information to the service



providers as necessary for them to provide the services that you have requested. The Company requires these service providers to enter into confidentiality agreements that limit their use of the information that they receive. Such agreements prohibit the service provider from using the Company's customer information that they receive other than to carry out the purposes for which the information was disclosed.

#### **4. RELEVANT DEPARTMENT**

##### 4.1 Customer Service Department

Email: [support@fullertonmarkets.com](mailto:support@fullertonmarkets.com)

##### 4.2 Compliance Department

Email: [compliance@fullertonmarkets.com](mailto:compliance@fullertonmarkets.com)