

## PRIVACY POLICY

BNFX Capital Limited (the "Company") respects the privacy of every individual and/or legal entity representative (the "User") who utilises the Company's services and web sites. The provisions of this privacy policy notice shall apply to current Users as well as former Users.

The term "personal data" shall refer to the information relating to the User, which can be identified for each specific User, such as a name, address, phone number, and email address.

The Company encourages all Users to read this entire privacy policy notice before using the Company's services and web sites.

## PERSONAL DATA

When a User applies for, and opens, a demo or live account with the Company, or otherwise contacts the Company through the forms provided on the Company's web sites, the Company may collect personal data from the User for business purposes, including but not limited to evaluations of the User's trading experience, collection of verification documents to prevent fraud, informing the User of new products and services that may be of interest to the User, and providing general service and consultation. Additionally, when communications are sent to the Company, the User's IP address (which is visible to all web sites on the internet which the User may visit) may be logged for security and/or fraud prevention purposes.

Collected Personal Data may include:

- a) information required to apply for an account and/or other Company forms, such as name, residential address, date of birth, and citizenship;
- b) information necessary for payments and withdrawals, such as an account number for wire transfers, your trading account balances, trading activity, etc.;
- c) verification documents required to verify your identity, such as a legible and valid government-issued identification document, and associated information that the Company may receive from public records and/or other entities to comply with AML and anti-fraud regulations;
- d) other know-your-client required information such as estimated income, investment or trading experience, etc.



## **USE OF PERSONAL DATA**

The Company may use a User's personal data for one or more of the following purposes:

- a) to confirm the User's identity;
- b) to process trading and non-trading operations;
- c) to inform the User of new products offered by the Company that may be of interest to the User;
- d) to provide other services that are relevant to the User's business relationship with the Company;
- e) to maintain a correct and updated record of the User's account data;
- f) to analyse statistical data to provide Users with the most suitable products and services.

## **ABOUT COOKIES**

Cookies are small text files sent to the User's computer from a web site so that the web site may later track its returning Users upon subsequent visits to the same web site. Cookies store information such as personal preferences to allow repeat visitors to a web site to return without requiring the User to redundantly enter the same information every time. Cookies are not used to determine personal identity of any natural person visiting the web site.

## **COMPANY AFFILIATE INFORMATION SHARING**

The Company may share a User's personal data with its affiliates and regional offices for business purposes, such as processing trading and non-trading transactions. The Company's affiliates shall maintain the privacy of the User's information to the same extent that the Company does in accordance with this privacy policy.

## **THIRD PARTY INFORMATION SHARING**

The Company will not sell Users' information to third parties. The Company may only share User information with non-affiliated companies such as a third party service provider who may provide support services for the User's account or facilitate transactions between the User and the Company, including entities who provide professional, legal, and/or accounting services to the Company. Such non-affiliated entities who assist the Company in providing services to the User are required to maintain confidentiality of such information to the extent that the information is received and used only in the course of providing such services and only for the purposes that the Company dictates.



## REGULATORY DISCLOSURE

Under limited circumstances, the Company may disclose a User's personal data in order to comply with applicable laws and regulations. For example, the Company may be required to disclose personal data to cooperate with law enforcement agencies to comply with subpoenas or other requests, and as necessary to protect the Company's rights and/or property. Additionally, the Company is obliged to report any suspicious transactions or activities to the authorities in compliance with the Anti Money Laundering and Countering Financing of Terrorism Act 2009 in New Zealand.

Except as described in this privacy policy, the Company shall not use a User's personal data for any other purpose unless the Company describes how such information will be used at the time the User discloses it to the Company or the Company obtains the User's permission.

## OPT OUT

Users are not required to supply any personal data that may be requested by the Company. However, failure to do so may result in the Company's inability to open or maintain a User's account or to provide services to the User. While the Company makes all reasonable efforts to ensure that all information it holds about each User is accurate, complete, and up to date, Users may help the Company considerably by promptly notifying the Company's representatives of any changes to the User's personal data.

