

Privacy Policy

Prepared 1 June 2011

What is this policy about?

The International Securities & Derivatives Group Pty Limited ("ISDG") recognises the importance of ensuring that its clients have confidence in the way ISDG handles personal information. This document sets out the policy of ISDG for handling personal information and has been prepared to:

1. Provide ISDG staff and representatives with information about what they can do with personal information collected from clients; and
2. Provide clients with information what ISDG can do with personal information given to ISDG.

ISDG is bound by, and committed to the terms of the Privacy Act 1988 and the National Privacy Principles forming part of that Act. A summary of the National Privacy principles is available by contacting our office.

What is Personal Information?

Personal Information is any information about you, that identifies you or by which your identity can reasonably be ascertained.

What kinds of Personal Information do we collect and hold about you?

ISDG and its representatives only collect Personal Information that is necessary for one or more of its functions or activities. ISDG is subject to certain legislative and regulatory requirements which necessitate ISDG obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you ("Personal Information").

In order to open a trading account for you, provide you with advisory services in financial products, and to have a reasonable basis for those recommendations, ISDG require certain personal Information about you, including your:

- age;
- employment details;
- financial needs and objectives
- income, asset, & liability details;
- investment and trading experience; &
- tolerance to risk

When opening a trading account for you, we will also ask you for certified copies of primary identification documents, including your Passport and/or Drivers Licence.

We will not collect any Personal Information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us. Generally collection of your Personal Information will be effected in either face-to-face interview, over the telephone or by way of a Client Agreement Form & supporting documentation. From time to time additional and/or updated Personal Information may be collected through one or more of those methods.

We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested including:

- opening a trading account;
- making Financial Product recommendations;
- provision of training and education tools;

and all things necessary or incidental to the above.

How is Personal Information collected?

Most information we hold about clients is collected from the Client Agreement Form and the account opening application process. Information may also be collected over the phone or via the internet during the course of the client's relationship with ISDG and its representatives.

Sometimes, information about an individual is collected from other people or organisations. For example, information about a director of a corporate customer may be obtained from a public record relating to the company. Regardless of how it is collected, all Personal Information is handled in accordance with this privacy policy.

What does ISDG use Personal Information for?

ISDG uses the Personal Information it holds in order to provide its clients with the services they request. ISDG will not use or disclose Personal Information collected by us for any purpose other than:

- (a) the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- (b) where you have consented to such disclosure; or
- (c) where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

In addition, ISDG may provide your Personal Information to any entity related or associated with ISDG.

ISDG is required under the Corporations Act to make certain information available for inspection by the Australian Securities and Investments Commission (ASIC) on request to ensure ongoing compliance with licensing and regulatory requirements. This may involve the disclosure of your Personal Information. ISDG may also collect Personal Information from its suppliers in order to complete business transactions and purchase products and services.

It is a condition of our agreement with each of our authorised representatives that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any contractor to whom it is disclosed in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below (refer paragraph below entitled contact details).

ISDG may use the Personal Information collected from you for the purpose of providing you with direct marketing material such as research that may be of interest to you, to inform you about new products and services or special offers from time to time. However you may, by contacting us by any of the methods detailed below, request not to receive such information and we will give effect to that request. Please allow 1 week for your request to be actioned.

Document storage and security

We will at all times seek to ensure that the Personal Information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your Personal Information is treated as confidential and any sensitive information is treated as highly confidential and stored securely.

Your Personal Information is generally held in your client file. Information may also be held in a computer database. ISDG will take reasonable steps to ensure that all Personal Information we collect or use is:

- accurate, complete and up-to-date;
- stored in a secure environment; &
- accessed only by the authorised personnel for permitted purposes.

If your details change, we ask that you advise us of the change as soon as possible in order that we may maintain accurate records.

Access to ISDG's premises is controlled, with unauthorised persons strictly prohibited. All electronic information is protected by maintaining a certified security capable Operating System i.e. access is only granted via suitable passwords on each computer.

In the event you cease to be a client of this organisation, any Personal Information which we hold about you will be maintained in a secure off site storage facility for a period of 7 years in order to comply with legislative and regulatory requirements, following which time the information will be destroyed.

Access to your Personal Information

You may at any time, by contacting ISDG (refer paragraph below entitled contact details), request access to your Personal Information. ISDG will (subject to the following exceptions) provide you with access to that information either by:

- providing you with copies of the information requested;
- allowing you to inspect the information requested; or
- providing you with an accurate summary of the information held.

We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

ISDG 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 related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- 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; or
- 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.

In the event we refuse you access to your Personal Information, we will provide reasons.

Correction of Personal Information

ISDG will endeavour to ensure that, at all times, the personal Information about you (that we hold) is up to date and accurate. In the event that you become aware, or believe, that any Personal Information which ISDG hold about you is inaccurate, incomplete or outdated, you may contact us (refer details below) and provide to ISDG evidence of the inaccuracy or incompleteness.

ISDG will, if we agree that the information requires correcting, take all reasonable steps to correct the information. If ISDG does not agree that your Personal Information requires correcting, ISDG must, if you request, take reasonable steps to ensure that whenever your Personal Information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

We will endeavour to respond to any request for access within 2 weeks, depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

Does ISDG disclose Personal Information?

Sometimes ISDG obtains services from other organisations and where necessary (and where the law permits), Personal Information will be provided to those organisations. The kinds of services obtained externally by ISDG include clearing and execution services, information technology support, financial advice and legal advice.

External service providers are only authorised to use Personal Information for the purpose for which ISDG supplied it. Those organisations are not authorised to use that Personal Information for their own purposes.

Sometimes, the law requires ISDG to disclose Personal Information. For example, information may be disclosed to a court in response to a subpoena or to a Government agency such as the Australian Taxation Office on receipt of a direction issued under taxation laws.

Where a client nominates someone to act on their behalf, ISDG may provide information to that person, for example, the client's accountant or financial adviser.

Websites

ISDG has implemented procedures and installed equipment to safeguard the security and confidentiality of Personal Information collected via ISDG's and its representative's websites.

While it is not necessary to register your personal details to use our Web sites, ISDG may offer a registration service which will enable you to receive additional services and information. In the event you do register with us, ISDG will collect Personal Information from you including your name and e-mail address.

ISDG continually reviews these arrangements to ensure that they are doing all that is reasonably and technically feasible at the time to protect your information. Due to the nature of the Internet, we cannot guarantee that it is totally protected from hackers or misuse.

ISDG's Web sites contains links to other Web sites whose operator may or may not adhere to a privacy policy or be governed by the National Privacy Principles.

This Privacy Policy does not apply if you access another website through a link from ours. In this case the privacy policy of the owner of the other website (if any) will apply. We cannot and do not make any warranty or representation as to the practices of any linked websites in the handling of your Personal Information.

If you have registered with ISDG and decide, at any time, that you do not wish to receive any further information from ISDG, you can send an Email to the address listed below requesting to be removed from our online registration database. Please allow 1 week for your request to be actioned.

You may also amend or update your registration details by sending an Email to the same Email address noted below, providing your amended details. Please allow 1 week for your request to be actioned.

Cookies: ISDG's Web sites uses cookies that allow us to identify your browser while you are using ISDG's site. Cookies do not identify you; they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not. Your Internet service provider should be able to assist you to set your preferences.

Resolving concerns

If you believe that the privacy of your Personal Information has been compromised, you are entitled to complain. Complaints can be made by contacting the representative or department you were dealing with, or by contacting the ISDG Privacy Officer. We will respond to complaints as soon as possible.

It is ISDG's intention to use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

Contact Details

Attention: Joash Belousoff

Address: ISDG Pty Ltd
PO Box 479
GEELONG VIC 3220

Phone: (03) 5201 0136

Fax: (03) 9011 9636

Email: joash@isdg.com.au

Additional information

If you would like more information about ISDG's approach to privacy, you are encouraged to contact the Privacy Officer on the above mentioned details.