

# **Privacy Policy**

# Privacy Policy

Protecting the privacy and safeguarding the personal and financial information of our clients and website visitors is one of our highest priorities. The following Privacy Policy explains how Morris Prime Pty Ltd ("Morris Prime"), ACN 650 982 531, Australian Financial Services Licence (AFSL) Representative Number 001290992, treats your personal information.

## Personal information

"Personal information", as defined in the Privacy Act 1988 (Cth), refers to "information or an opinion, whether true or not, and whether recorded in a material format or not, about an identified individual, or an individual who is reasonably identifiable". Any information or opinion that may lead to the reasonable inference to the identity of an individual may be considered personal information. "Sensitive information" as defined in the Privacy Act 1988 (Cth), refers to "information or an opinion about an individual's racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional trade or association; membership of a trade union; sexual orientation or practices; criminal record; health information; genetic information that is not otherwise health information; biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or biometric templates."

We encourage you to check our website regularly for any updates to our Privacy Policy.

## Collection of and use of personal information

We collect your personal information for the main purpose of providing you with financial products and services that you request. We collect your personal information directly from you and indirectly from third parties. Morris Prime Pty Ltd may use the information collected from you to verify your identity and contact information, establish your trading account, issue you an account number and a secure password, maintain your account and contact you with account information, among other reasons. This information also helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

Typically, Morris Prime Pty Ltd may collect the following details from you:

- Name, address, telephone number;
- Email address;
  - Date of birth;
  - Gender;
- Occupation and job title;
- Transaction details associated with your trading through us;
- Additional information provided to us and recorded by telephone;
- Information you provided to us on client agreement forms;
  - Financial information (Nominated bank account details, Statement of assets and liabilities, Tax file number, Employer etc.);
- Investment experience
- Company Organisation information; and Other related information.

We only collect personal information about you which is reasonably necessary to:

- Provide you quality products or services;
- Consider your applications;
- To provide you with technical support;
- To communicate relevant information to you;
- For our product development, marketing, planning, administration and credit control procedures;
- Maintain your contact details.
- Comply with our legal obligations, such as verify your identity under the AML/CTF Regulations and other regulatory laws; and
- Taking measures to detect and prevent fraud, crime or other activity which may cause harm to our business or our products and services.

The information we collect indirectly from you includes your Internet protocol ("IP") address, browser type, operating system, Internet service provider (ISP), time stamps and transaction history. Should you close your account with us, Morris Prime Pty Ltd will retain your information to the extent required by law.

We ensure that the personal information we collect and use or disclose is accurate, up to date, complete, and relevant. Please contact us if any of the details you have provided to us change or if you believe that the information we have about you is not accurate or up to date.

# Cookies

We use cookies and web beacons (also known as action tags or single-pixel gifs), and other technologies (collectively, "cookies") to provide us with data we can use to improve your experience and to know you better. Cookies are small text files sent from Web servers that may be stored on your computer. Cookies enable us to capture how you arrived at our site, when you return, which pages on our site you visit, and to recognise that you are already logged on when we receive a page request from your browser. We may link the information we store in cookies to personally identifiable information you submit while on our site. We will never share this information with any third party. Cookies are readable only by us and do not contain any personal information nor do they contain account or password information. We cannot and will not gather information about other sites you may have visited.

We may share usage information about visitors to our websites with reputable advertising companies for the purpose of targeting our Internet banner advertisements. The information collected by the advertising company by these pixel tags is not personally identifiable. We may also use third party software to track and analyse usage and volume statistical information including page requests, form requests and click paths. The third party may use cookies to track behaviour and may set cookies on behalf of Morris Prime Pty Ltd.

All web browsers have settings that allow you to block cookies. By visiting our website with your browser set to allow cookies, you consent to our use of cookies as described above. If you choose to block cookies you may use our services, but some functions may not work as designed.

## Sharing personal information with Morris Prime Pty Ltd affiliates and-non affiliated third parties

Morris Prime Pty Ltd does not sell, license, lease or otherwise disclose your personal information to any affiliate or third party for any reason, except as described below.

Morris Prime Pty Ltd may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer.

To help us improve our services to you, we may engage another business to help us carry out certain internal functions, such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a non-affiliated third party with client information from our database, including your name, address, phone number, and/or e-mail address, to help us analyse and identify client needs, notify clients of product and service offerings or conduct general marketing and market research for us.

Morris Prime Pty Ltd also forges partnerships and alliances with non-affiliated third parties which offer high-quality products and services that might be of value to our clients. To ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, Morris Prime Pty Ltd may share some personal information with these non-affiliated third parties.

We generally require that all non-affiliated third parties to which we provide your non-public personal information agree to keep your information confidential and use such information solely for the limited purpose for which we have engaged them, or as otherwise required by law. In addition, where offers are made to you by non-affiliated third parties, we generally require that they disclose that the offer is being extended because of your relationship with us. We also seek to ensure that these non-affiliated third parties maintain appropriate data security procedures to guard against unauthorised use of, or access to, your personal information.

When required by law, Morris Prime Pty Ltd reserves the right to disclose your personal information to third parties or regulatory, law enforcement or other government authorities. We may also disclose your information to credit reporting or collection agencies, or when necessary to protect our rights or property.

If at any time you choose to purchase a product or service offered by another company, for example

by clicking on an advertisement on a website owned or controlled by Morris Prime Pty Ltd, any personal information you share with that company will no longer be controlled under our Privacy Policy. We are not responsible for the privacy policies or the content of sites we link to and we have no control over the use or protection of information provided by you to, or collected by, those websites. Whenever you elect to link to a co-branded website or to a

linked website, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party, and you should familiarise yourself with the privacy policy published by that third party.

## **The security of your personal information**

We are committed to protecting any personal information we hold about you from misuse, interference, loss, unauthorised access, modification and disclosure. For this purpose, we employ security software, systems and procedures to offer you a safe and secure trading environment and to protect your personal, financial and trading information. We ensure the ongoing adequacy of these measures by regularly reviewing them.

**Our security measures include, but are not limited to:**

- (a) educating our staff as to their obligations with regard to your personal information;
- (b) requiring our staff to use passwords when accessing our systems;
- (c) encrypting and backing up data sent from your computer to our systems during Internet transactions and customer access codes transmitted across networks;
- (d) employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems;
- (e) using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- (f) providing secure storage for physical records; and
- (g) employing physical and electronic means such as alarms, cameras and guards (as required) to protect against unauthorised access to buildings.

When you open an account with us, you are issued a unique account number, User ID and a password. Only a limited number of Morris Prime Pty Ltd employees who have a need to know this information will have access to your account number, User ID, and password. Remember that you are ultimately responsible for maintaining the secrecy of your account number, User ID and password. We strongly recommend that you do not disclose this information to anyone.

Personal information will be treated as confidential information and sensitive information will be treated highly confidential. 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 7 years. After this, the information will be destroyed.

# Access to your personal information

You can contact us to request access to your information. In normal circumstances we will give you full access to your information. However, there may be some legal or administrative reasons to deny access. By law, we do not have to provide you with access to your personal information if:

- (h) We believe there is a threat to life or public safety;
- (i) there is an unreasonable impact on other individuals;
- (j) the request is frivolous or vexatious;
- (k) the information wouldn't be ordinarily accessible because of legal proceedings;
- (l) it would prejudice negotiations with you;
- (m) it would be unlawful;
- (n) it would jeopardise taking action against serious misconduct by you;
- (o) it would be likely to harm the activities of an enforcement body (e.g., the police); or
- (p) it would harm the confidentiality of our commercial information.

If access is denied, we will provide you with the reason. We also have an obligation to be reasonably certain that the information we hold on file for you is accurate and up-to-date. Please contact us if you believe information we hold about you may be incorrect, inaccurate or out of date.

# Dealing with unsolicited information

If we receive personal information that is not solicited by us, we will only retain it, if we determine that it is reasonably necessary for one or more of our functions or activities and that you have consented to the information being collected or given or given the absence of your consent that it was impractical or unreasonable for us to obtain it under the circumstances. If these conditions are not met, we will destroy or de-identify the information.

# Aggregated data

Aggregated data is general data about groups of people which do not identify anyone personally, for example, the number of people in a particular industry that engage in derivative trading. We use aggregated data to:

- Help us understand how you use our products and services and improve your experience with us; and

- Customise the way we communicate with you about our products and service so that we can interact with you more effectively.

We may share aggregated data with our business or industry partners.

## Record-keeping

Please note under the AML/CTF Act, we are required to retain customer identification records and transaction records for at least seven years after we have stopped providing our services to you.

## Notifying you

When we receive personal information from you directly, we will take reasonable steps to notify you how and why we collected your information, who we may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Sometimes we collect your personal information from third parties. You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

## Who we may communicate with

Depending on the product or service you have, the entities we exchange your information with include but are not limited to:

- a. brokers and agents who refer your business to us;
- b. affiliated product and service providers and external product and service providers for whom we act as agent, so that they may provide you with the product or service you seek or in which you have expressed an interest;
- c. auditors we appoint to ensure the integrity of our operations;
- d. any person acting on your behalf, including your solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
- e. if required or authorised to do so, regulatory bodies and government agencies;
- f. credit reporting agencies;
- g. insurers, including proposed insurers and insurance reference agencies, where we are considering whether to accept a proposal of insurance from you and, if so, on what terms;
- h. other financial institutions and organisations at their request if you seek credit from them, so that they may assess whether to offer you credit;



- i. other organisations and associations who in conjunction with us provide products and services so that they may provide their products and services to you; and
- j. professional associations or organisations with whom we conduct an affinity relationship to verify your membership of those associations or organisations.

Our use or disclosure of personal information may not be limited to the examples above. We may be required to disclose customer information by law e.g., under Court Orders or Statutory Notices pursuant to taxation or social security laws or under laws relating to sanctions, anti-money laundering or counter-terrorism financing.

## **Outsourcing**

We disclose personal information when we outsource certain functions, including bulk mailing, market research, direct marketing, statement production, debt recovery and information technology support. We also seek expert help from time to time to help improve our systems, products and services.

In all circumstances where personal information may become known to our contractors, agents and outsourced service providers, there are confidentiality arrangements in place. Contractors, agents and outsourced service providers are not able to use or disclose personal information for any purposes other than our own.

We take our obligations to protect customer information very seriously; we make every effort to deal with only parties who share and demonstrate the same attitude.

## **Other countries**

You acknowledge that it may be necessary for your information to be transferred to organisations who provides a service to us outside of Australia, and you consent to such transfer.

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under foreign law. In those instances, we will not be responsible for that disclosure.

By using our services, you are consenting to the disclosure of your information as described in this Privacy Policy. However, you may withdraw consent at any time by contacting our office, however this may mean we may be unable to continue providing you with our services if you withdraw your consent.

## Your rights

At any time, you can:

- Request to learn what Personal Information we hold about you.
- Request the deletion (erasure) of your information. This may include anonymisation pseudo- anonymisation of some data instead of total deletion.
- Correct that information online, or where this is not possible, via our service team.
- Object to the continued use, processing or storing of your personal identifiable information.
- Lodge a complaint with the regulatory authority for your country or economic zone.

### Request to erase your personal data

You may request us to delete or remove personal data where there is no good reason for us to process it. Note, however, that 1) 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; and 2) we may not be able to continue providing our services to you if you request for your personal data to be erased.

## Changes to this Privacy Policy and opting out

In the event Morris Prime Pty Ltd materially changes this Privacy Policy, the revised Privacy Policy will promptly be posted to our websites. By opening an account with us, you agree to accept posting of a revised Privacy Policy electronically on our website as sufficient notice to you.

Under certain circumstances, such as with respect to our sharing of your personal information with non-affiliated third parties, you may inform us that you would like to 'opt out' by contacting us through the contact information listed below. Note that for joint accounts, an opt-out election made by one account owner of a joint account is applicable to all account

owners of the joint account. An opt- out election must be made for each separate account you hold at Morris Prime Pty Ltd.

Any dispute over our Privacy Policy is subject to this notice and the Morris Prime Pty Ltd Account Terms. If you have any questions that this Privacy Policy does not address, please contact a Client Services representative.

## **How you can complain about a breach of the Australian Privacy Principles (APP) and how we will deal with such a complaint**

If you feel that we have breached our obligations in the handling, use or disclosure of their personal information, they may raise a complaint. We encourage individuals to discuss the situation with one of our representatives in the first instance, before making a complaint.

The complaints handling process is as follows:

The individual should make the complaint including as much detail about the issue as possible, in writing to us at:

**Morris Prime Pty Ltd**

Suite 801, 6A Glen St, Milsons Point New 2061, Australia

Tel: +64 9 889 4022

Email: [support@mpfx.com.au](mailto:support@mpfx.com.au)

We will investigate the circumstances included in the complaint and respond to the individual as soon as possible (and within 30 calendar days) regarding our findings and actions following this investigation.

To assist us in helping you, we ask you to follow a simple three-step process:

1. Gather all supporting documents relating to the complaint;
2. Contact us and we will review your situation and if possible, resolve your complaint immediately.
3. If the matter is not resolved to your satisfaction, please contact our Complaints Officer on the phone number above or submit your complaint in writing.

After considering this response, if you are still not satisfied, you may escalate your complaint directly to the Information Commissioner for investigation:

**Office of the Australian Information Commissioner (OAIC)**  
**[www.oaic.gov.au](http://www.oaic.gov.au)**  
**Phone: 1300 363 992**

**When investigating a complaint, the OAIC will initially attempt to conciliate the complaint, before considering the exercise of other complaint resolution powers.**

**Alternatively, if the complaint relates to a non-privacy matter, or should individuals choose to do so, a complaint may also be lodged with AFCA:**

**Australian Financial Complaints Authority Limited**  
**GPO Box 3**  
**Melbourne VIC 3001 (Australia)**  
**[www.afca.org.au](http://www.afca.org.au)**  
**Phone: 1800 931 678**

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