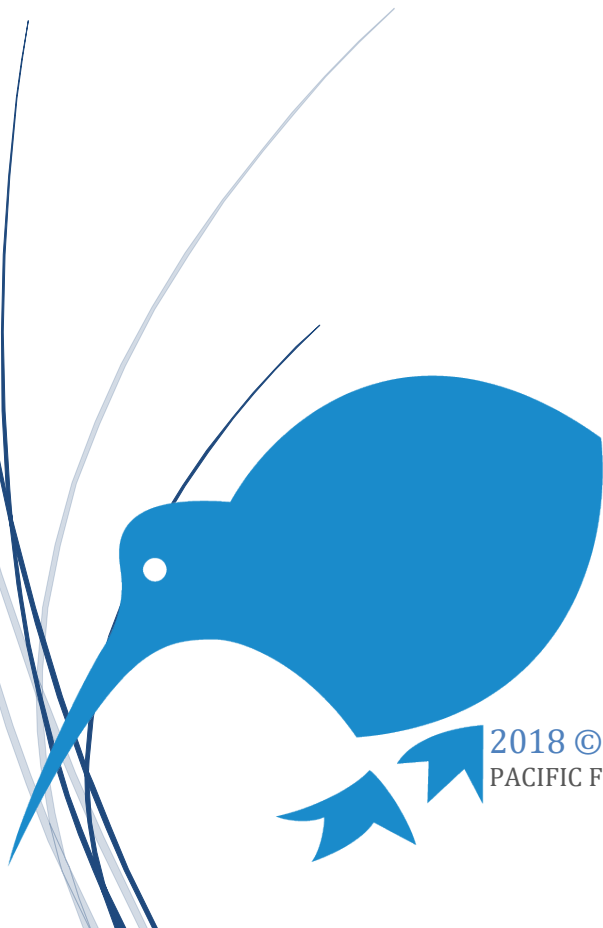


13/07/2018

PRIVACY POLICY



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PACIFIC FINANCIAL DERIVATIVES LIMITED

Pacific Financial Derivatives Limited - our Privacy Policy

1. Commitment to Protect your Privacy

Pacific Financial Derivatives Limited (“the company”, “we”, “us”) is committed to protecting your personal data and understand the importance of maintaining the confidentiality and privacy of any personal information you provide to us. By entrusting us with your information, we would like to assure you of our commitment to keep such information private.

2. The data we collect about you

Personal information (data) means any information about an individual from which that person can be identified

We may collect your personal information directly from you (in your completed Account Opening Application Form or other way) or, with your consent, from other persons including, for example, credit reference agencies, fraud prevention agencies, banks, other financial institutions, third party authentication service providers and the providers of public registers.

We may also collect your Personal Data from your use of our website such as pages visited, frequency, duration of visit. We may also monitor trading activities on trading platforms that we might have access to (such as MT4).

From time to time we may also request further information to help us improve our services to you or to comply with our obligations under any applicable laws or Regulations of New Zealand Privacy Act 2020.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

3. Use of the Information

Your Personal Data which we hold is treated by us as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of our services to you or the furthering of our Agreement between us, establishing and managing your account, reviewing your ongoing needs and, improving our relationship. We also have certain statutory obligations including but not restricted to anti money laundering obligations and ensuring competence in dealing with derivatives trading (refer to our product disclosure statement).

We may also collect and process non-personal data for statistical purposes and analysis and to help us provided better services.

4. Personal Data collected on Account Registration

When you register for an account with the Company, we require you to provide your first and last name, email address, your residential address, phone number, date of birth, details about your financial status, summary of your knowledge and experience of derivatives trading, copy of your photo-ID, such

as passport, driving license or national ID, a copy of a recent utility bill/bank statement (or similar) as evidence of your residential address and bank details.

All this data is used to verify your identity, to set up and administer your trading account and provide technical and customer support. This data is used for the time you are a client and we do monitor your trading activities including deposits and withdrawals, margin calls and trading progress. It is also collected to ensure our legal obligations which include but are not limited to anti money laundering and comfort you have suitable experience and knowledge of the products we sell.

If it is necessary to use your Personal Data for any other service you may request whilst using services, we'll tell you how we will use your Personal Data at the time and if there are any additional terms and conditions which will apply. You will be asked to confirm you agree to these additional terms and conditions before your application can proceed.

5. Contacting You

We may send you information by SMS, phone or email about our products, services and offers we think would be of interest to you. As a Client you will receive email communications from us about your activity on the platform as well as special market and company events that it is appropriate to advise. These communications are generally required to be provided as a condition of our trading licence and will be sent by the method advised by you at time of on boarding.

When contacting you in this way, we may request you to provide personalised data to verify your identity.

6. Retention and Disclosure of Personal Data

Under our terms of business, we reserve the right to retain and disclose your Personal Data in order to comply with a legal obligation and for any other purposes for which you have provided your consent or which you may have requested.

Your Personal Data may be retained and disclosed:

- (a) In order to comply with our obligations deriving from the applicable law and regulations, which may include laws and regulations outside your country of residence;
- (b) where required by law or a court order by a competent Court;
- (c) where requested by our Regulatory Authority, the Financial Markets Authority of New Zealand or any other regulatory, public and government authority having control or jurisdiction over us or you;
- (d) to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- (e) to carry out anti-money laundering, sanctions or Know Your Customer checks as required by applicable laws and regulations;
- (f) to obtain third party authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of you. To do so they may check the details you supplied against any particulars on any database (public or otherwise) to which they have access. A record of the search will be retained by us.

We may also be required to use and retain personal data after you have closed your account with us for legal, regulatory and compliance purposes, such as the prevention, detection or investigation of a

crime; loss; prevention; or fraud prevention. Notwithstanding this proviso, we will not retain your personal information beyond 7 years from the time you cease to be a client.

7. Safeguard Measures

Your Information is stored on secure servers. Our security systems and controls are monitored constantly and subject to external audit at least once a year.

We limit access of your Information only to those employees or partners that need to know the information in order to enable the performance of the services from us.

While we will use all reasonable efforts and take all recommended technical and organisational measures to safeguard your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

8. Change of Information

You may inform the Company at any time that your Information has changed or that you wish the Company to delete information we hold about you by emailing us at compliance@pfd-nz.com. We will change or delete your Information in accordance to your instructions, except to the extent that we are required to hold your Information for regulatory or legal purposes. Any new data received will be subject to the terms and conditions of this Privacy Policy.

9. Right of Access

You have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy. To make a request, please contact us on compliance@pfd-nz.com, verifying your identity and specifying what information you require. There is no cost to receive this information. We will respond to you as soon as practicable but no later than 1 month from the date of your request.

