



JB Alpha Ltd
PRIVACY POLICY
www.alphabroking.com.au

PRIVACY POLICY

What is this Policy About?

AlphaBroking recognises the importance of ensuring that its clients have confidence in the way AlphaBroking handles personal information.

AlphaBroking is bound by, and committed to, the terms of the Privacy Act 1988 and the National Privacy Principles (NPP) forming part of that Act. Since March 2014 the NPP has been replaced by the Australian Privacy Principles (APP).

Unless clients state otherwise, the Privacy Act permits AlphaBroking to share the personal information which it holds with all of its companies. If related companies are entitled to use that personal information, they may only do so for the purposes for which the personal information was collected.

What is Personal Information?

Personal information is any information about a client, that identifies the client or by which the client's identity can reasonably be ascertained.

- AlphaBroking will only collect information about a client that is necessary in order to adequately provide the services the client has requested.
- The use or disclosure of personal information collected by AlphaBroking is subject to approval by its Compliance Dept.
- AlphaBroking may be requested by regulators to provide certain personal information about clients, and is by law obligated to provide such information.
- Clients can request to review personal information held by AlphaBroking by contacting their advisor or AlphaBroking Compliance Dept.
- determine credit worthiness;
- assist the client in gaining an understanding of a financial product;
- make financial products recommendations;
- execute financial products transactions on behalf of a client;
- clear and settle financial products transactions on a client's behalf;
- invest in financial products on behalf of a client

AlphaBroking only collects personal information that is necessary for one or more of its functions or activities.

AlphaBroking is subject to certain legislative and regulatory requirements which necessitate it obtaining and holding detailed information which personally identifies the clients and/or contains information or an opinion about clients ("Personal Information").

AlphaBroking will not collect any Personal Information about a client except when the information provided to AlphaBroking is authorised by a client or a third party to provide that information. Generally, collection of personal information will be obtained in either face-to-face interviews, over the telephone or by way of a Client Agreement Form. From time to time additional and/or updated personal information may be collected through one or more of those methods.

In order to provide clients with a comprehensive advisory and dealing service in financial products, and to have a reasonable basis for recommendations made, AlphaBroking may request personal information to:

How is Personal Information Collected?

Most information we hold about clients is collected from the Client Agreement Form and through the Know Your Client (KYC) process. Information may also be collected over the phone or via the internet. 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.

Use and Disclosure of Personal Information

AlphaBroking uses the personal information it holds in order to provide its clients with the services they request. No company within AlphaBroking will use or disclose Personal Information collected for any purpose other than:

- (a) the purposes for which it was provided or secondary related purposes in circumstances where the client would reasonably expect such use or disclosure; or
- (b) where the client has consented to such disclosure; or
- (c) where the Australian 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.

AlphaBroking is required under the Corporations Act to make certain information available for inspection, on request to ensure ongoing compliance with licensing and regulatory requirements. This may involve the disclosure of Personal Information.

AlphaBroking may also collect personal information from its suppliers in order to complete business transactions and purchase products and services.

AlphaBroking may disclose the clients' Personal Information to market operators, clearers and product issuers for the purpose of giving effect to clients' instructions and the recommendations made by AlphaBroking. AlphaBroking may disclose clients' Personal Information to external contractors (service providers) for the following purposes:

- (a) execution, clearing and settlement of Financial Products transactions
- (b) registration and/or changes to shareholder detail
- (c) accounting for Financial Products transactions
- (d) causing statutory audits to be conducted as required by law
- (e) maintenance and support of AlphaBroking's information technology systems
- (f) in the course of reviews by external consultants
- (g) financial or legal advice

It is a condition of our agreement with each of AlphaBroking's external contractors that they adopt and adhere to this privacy policy. Clients can be assured that their personal information will be maintained by any contractor to whom it is disclosed in accordance with this policy. If clients have any concerns in this regard, they should contact AlphaBroking by any of the methods detailed below (refer paragraph below entitled contact details).

External service providers are only authorised to use personal information for the purpose for which we supplied it. Those organisations are not authorised to use that personal information for their own purposes.

It is important to note that some of the Group's services include Funds

Management and related investment advice. Providing a client with this service includes undertaking activities such as administering the client's accounts or their investments, providing client support, responding to inquiries and requests for product information and meeting regulatory requirements.

If AlphaBroking is unable to collect personal information from or about an individual, it may not be able to do business with that individual or the organisation with which the individual is connected.

AlphaBroking may use the Personal Information collected from clients for the purpose of providing them with direct marketing material such as research that may be of interest, to inform them about new products and services or special offers from time to time. However clients may, by contacting AlphaBroking by any of the methods detailed below, request not to receive such information and we will give effect to that request. Please allow 2 weeks for the request to be actioned.

Document Storage and Security

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

Access to AlphaBroking's premises is controlled by only allowing personnel with security passes to access the premises. Unauthorised persons are strictly prohibited from entering our dealing rooms. 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 AlphaBroking holds 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.

Clients' Access to Personal Information

Clients may at any time request access to personal information.

AlphaBroking will, subject to the exceptions listed below, provide access to that information either by:

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

AlphaBroking will, prior to providing access in accordance with this policy, require clients to provide evidence of identity.

AlphaBroking will **not** provide access to a client's personal information if:

- (a) providing access would pose a serious threat to the life or health of a person;
- (b) providing access would have an unreasonable impact on the privacy of others;
- (c) the request for access is frivolous or vexatious;
- (d) the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- (e) providing access would reveal AlphaBroking's intentions in relation to negotiations with a client in such a

- way as to prejudice those negotiations;
- (f) providing access would be unlawful;
 - (g) denying access is required by law;
 - (h) providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body's requests that access not be provided on the grounds of national security.

In the event AlphaBroking refuses clients access to personal information, reasons will be provided.

Correction of Personal Information

AlphaBroking will endeavour to ensure that, at all times, the personal information about clients is up to date and accurate. In the event that clients become aware, or believe, that any personal information which AlphaBroking holds is inaccurate, incomplete or outdated, clients may contact AlphaBroking and provide evidence of the inaccuracy or incompleteness. AlphaBroking will, subject to the exceptions under section 7 above, take all reasonable steps to correct clients' personal information.

Website

AlphaBroking has implemented procedures and installed equipment to safeguard the security and confidentiality of personal information collected via our website. While it is not necessary to register a client's personal details to use AlphaBroking's website, AlphaBroking do offer a registration service which will enable a client to receive additional services and information. In the event that clients do register with AlphaBroking, personal information including the name and e-mail address will be collected.

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

AlphaBroking website 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 clients access another website through a link from AlphaBroking's website. In this case the privacy policy of the owner of the other website (if any) will apply. AlphaBroking cannot and will not make any warranty or representation as to the practices of any linked websites in the handling of personal information.

If clients have registered with AlphaBroking and decide, at any time, that they do not wish to receive any further information from any company within AlphaBroking, they can send an email to the address listed below requesting to be removed from the online registration database. Please allow two weeks for the request to be actioned.

Cookies: AlphaBroking's website uses cookies that allow AlphaBroking to identify users browser while you are using AlphaBroking's site. Cookies do not identify users, they simply allow AlphaBroking to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers allow users to be notified when they 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 Clients' Concerns about Access to Personal Information

If clients believe that the privacy of their personal information has been

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compromised, clients are entitled to complain. Complaints can be made by contacting AlphaBroking Privacy Officer. AlphaBroking will respond to complaints as soon as possible. It is our intention to use our best endeavours to resolve any complaint to clients' satisfaction, however, if you are unhappy with AlphaBroking's response, clients are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

Contact Details

Privacy Officer	
Address:	JB Alpha Ltd Ground Floor 61 Spring Street Melbourne VIC 3000
Telephone:	03 8662 4000
Facsimile:	03 8662 4001
Email:	compliance@alphabroking.com.au

Privacy Commissioner

If an individual is not satisfied with our response to their complaint, they can complain to the Privacy Commissioner online at www.privacy.gov.au or call 1300 363 992.

