

## Privacy Policy

Please read this Privacy Policy carefully before using the [www.marketech.com.au](http://www.marketech.com.au) website or integrated application and any and all related documentation (Platform) operated by Marketech Online Trading Pty Ltd (ACN 654 674 432) ('Marketech', 'we', 'our' or 'us'); an Authorised Representative (Corporate Authorised Representative number 1293528) of Sanlam Private Wealth Pty Ltd (Australian Financial Services Licence number 337927) ('Sanlam').

This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Platform and the choices you have associated with that data.

We are committed to managing personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth), the General Data Protection Regulation (EU) 2016 / 679 (GDPR) (if applicable to you) and in accordance with other applicable privacy laws.

We use your data to provide and improve the Platform. By using the Platform, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms of Use, accessible from our website.

Effective Date: 1 November 2021

### What Personal Information is collected?

While using our Platform, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (Personal Information). Personal Information may include, but is not limited to your:

- Email address
- First name and last name
- IP address

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or the instructions provided in any email we send.

If you elect to open a share trading account with Marketch, additional personal information is requested by, or provided directly to, third parties to facilitate opening the account, including:

- OpenMarkets Australia Limited ABN 38 090 472 012 (AFSL No 246705) (Openmarkets) – Privacy policy available [here](#);
- Macquarie Group – Privacy policy available [here](#) ;
- Sanlam Private Wealth Pty Ltd (Australian Financial Services Licence number 337927) – Privacy policy available [here](#).

## **Why Personal Information is collected**

Marketch uses the collected data for various purposes to:

- provide and maintain our Platform;
- allow you to use the Platform;
- notify you about changes to our Platform;
- allow you to participate in interactive features of our Platform when you choose to do so;
- provide customer support;
- gather analysis or valuable information so that we can improve our Platform monitor the usage of our Platform;
- detect, prevent and address technical issues;
- comply with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), including but not limited to monitoring and reporting suspicious activity; and/or
- provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already participated in, purchased or enquired about, unless you have opted not to receive such information.

## **When Personal Information is collected**

Marketch collects your Personal Information when you visit our website, when you use the Platform and when you interact with us via phone, email or in person.

Examples of when we collect your personal information include:

- When you provide us with Personal Information through our website;
- When you visit our website;
- When we process payments on, or in exchange for, the Platform;

- When you contact us via phone, email, letter or in person;
- When your Personal Information is provided to us to perform services through the Platform;
- When you use the Platform; and/or
- If you are a candidate for employment, when you complete forms as part of your employment application

## **If you do not provide your Personal Information**

If we are unable to collect your Personal Information, we may not be able to provide the Platform to you. Your experience when interacting with us may be delayed or not as efficient as you would like.

## **How Personal Information is stored**

### **Data Security**

Marketch takes every effort to store your Personal Information safely. The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Marketch may hold your Personal Information either in electronic or hard copy form. When we store information electronically, this may be on our computer systems, databases, software programs, internet servers and hosted internet solutions. We take every effort to keep your information safe in accordance with relevant government regulation and requirements. Our servers, computer systems and internet hosting are protected through necessary security systems including physical locks, firewalls, security systems and passwords.

### **Retention of Data**

Marketch will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

Marketch will also retain Usage Data (see below) for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Platform, or we are legally obligated to retain this data for longer periods.

Please note that we may have a legal obligation to retain copies of your information in certain circumstances for a particular period of time, such as to comply with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).

## **How Personal Information is used**

Marketch uses your Personal Information to provide the Platform. We do not sell your Personal Information to third parties. However, we may share some of your data with our third-party partners in the provision of the Platform in accordance with this Privacy Policy. When this is done, our partners are obligated to only use your data for the reasons agreed with us and have committed to not misuse or sell your data in any way. Your Personal Information may be shared to the following partners:

Our employees, contractors or service providers in the instance that this is necessary to provide the Platform to you, including but not limited to the Macquarie Group and Openmarkets Australia Ltd (ABN 38 090 472 012 AFSL No 246705)

Our business advisors including accountants, lawyers and other business professionals where reasonably required for them to fulfil their obligations to us  
If required by law to any person or body authorised by such law

Your Personal Information may be disclosed to third parties if disclosure is required by law. If we sell our business, or we have a change in control, your personal information will be disclosed and transferred to the new owner/controller for that purpose.

We are not liable for any loss, damage or claim arising out of a third party's use of your Personal Information where we were authorised by you or law to provide that third party with your Personal Information.

## **Disclosure of Personal Information overseas**

Marketch is based in Australia so the majority of our service providers are Australian based. If you are located outside Australia and choose to provide information to us, please note that we transfer the data, including Personal Data, to Australia and process it there.

However, we may from time to time collaborate with overseas partners. We only ever disclose your personal information outside the jurisdiction it was collected where we are permitted to do so under applicable privacy laws. This means that we have taken all necessary steps to keep your information safe as per the relevant privacy regulations.

Marketch will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal

Information will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

## **Business Transactions**

If Marketch is involved in a merger, acquisition or asset sale, your Personal Information may be transferred. We will provide notice before your Personal Information is transferred and becomes subject to a different Privacy Policy.

## **Usage Data, Cookies & Platform Providers**

### **Usage Data**

We may collect information on how you access and use the Platform (Usage Data). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Platform that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

### **Cookies**

We use cookies and similar tracking technologies to track the activity on our Platform and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyse our Platform.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Platform.

Examples of Cookies we use:

- **Session Cookies:** We use Session Cookies to operate our Platform.
- **Preference Cookies:** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies:** We use Security Cookies for security purposes.
- **Conversion tracking Cookies:** For keeping track of referral brokerage credits

## **Platform Providers**

We may employ third-party companies and individuals to facilitate our Platform (Platform Providers), provide the Platform on our behalf, perform Platform-related services or assist us in analysing how our Platform is used.

These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **Analytics**

We may use third-party Service Providers to monitor and analyse the use of our Platform.

### **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Platform. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Platform available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

### **Behavioural Remarketing**

Marketch uses remarketing services to advertise on third-party websites to you after you visited our Platform. We and our third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our Platform.

Google Ads (AdWords) Google Ads (AdWords) remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page:  
<http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on – <https://tools.google.com/dlpage/gaoptout> – for your web browser. Google Analytics Opt-out

Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

## **Payments**

We may provide paid products and/or services within the Platform. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

- Stripe – Privacy Policy available [here](#).

## **Links to Other Sites**

Our Platform may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third-party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## **Children's Privacy**

Our Platform does not address anyone under the age of 18 (Children).

We do not knowingly collect Personal Information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from children without verification of parental consent, we will take steps to remove that information from our servers.

## **Residents in the European Economic Area**



As a resident of the European Economic Area (EEA), you have certain data protection rights under the GDPR. Marketch's legal basis for collecting and using the Personal Information described in this Privacy Policy depends on the Personal Data (as defined in the GDPR) we collect and the specific context in which we collect it.

### **Marketch may process your Personal Data because:**

- We need to perform a contract with you;
- You have given us permission to do so;
- The processing is in our legitimate interests and it is not overridden by your rights;
- For payment processing purposes; and/or
- To comply with the law.

Marketch aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- *The right to access, update or delete the information we have on you.* Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you;
- *The right of rectification.* You have the right to have your information rectified if that information is inaccurate or incomplete;
- *The right to object.* You have the right to object to our processing of your Personal Data;
- *The right of restriction.* You have the right to request that we restrict the processing of your personal information;
- *The right to data portability.* You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format;
- *The right to withdraw consent.* You also have the right to withdraw your consent at any time where Marketch relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the EEA.

## **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Platform, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Complaints & Accessing your Personal Information**

You have the right to access your Personal Information stored by us at any time. Please us to make this request. Please note that it may take us a few days to collate all the Personal Information we have stored.

You have the right to be informed about how your Personal Information is being used and we will strive to update you when our privacy policy changes. You may also contact us at any time to ask questions about your Personal Information, or to update your details.

If you believe we have breached our privacy rights at any time, please contact us so that we can investigate and respond to you. All such enquiries will be taken seriously and handled with impartiality and discretion. If you wish to submit a complaint, please provide us with all relevant details, such as the date and time of the incident or communication, the circumstances surrounding the event and your concerns about what was said or done.

If you have complained about something that is not covered in the relevant privacy laws, we will explain why we are unable to take further action. Please refer to our [Complaints Policy](#) for further information.

If you wish to access or update your Personal Information, make a complaint or have any questions about this Privacy Policy, please contact us:

- Email: [info@marketech.com.au](mailto:info@marketech.com.au)
- Website: [marketech.com.au](http://marketech.com.au)
- Phone: (08) 9322 8444
- Mail: PO Box 7991, Cloisters Square PO, WA 6850

