



PRIVACY POLICY

Black Bull Group Limited

Version 1.0

01 May 2019

WHY DO WE HAVE A PRIVACY POLICY?

We understand that your privacy is important to you and that you have the right to know:

- what information we are collecting about you;
- how we collect information about you;
- how we use information about you;
- how we store information about you;
- how long we will hold information about you for; and
- how you can access the information that we hold about you and modify that information.

This Privacy Policy (**Policy**) explains how we collect, store, use and disclose personal information about you.

For the purposes of this Policy, we have referred to the information that we collect about you as “**personal information**”.

AGREEING TO THIS PRIVACY POLICY

By accessing our website and using our services, you consent to the collection, storage, use, and disclosure of your personal information in accordance with this Privacy Policy (**Policy**).

WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

We collect the following personal information about you:

- Your name and date of birth.
- Your email address, residential address and contact telephone numbers.
- Your bank account information, occupation, income and other information relating to your financial position.
- Specific documents to verify your identity and other personal information.
- Information required to determine your suitability to use the services that we offer.
- Information about what services you use and how you use those services.
- Information about the activities that you undertake in respect of the services that we offer. This includes, all transactions and activities on accounts that you have with us.
- Any correspondence between us and you.
- Preference information such as your marketing preferences.
- IP address and device type and ID.
- Information required to satisfy our legal and regulatory obligations.

If you give us personal information about another person, you warrant and represent to us that you are authorised to provide this information to us and you agree to inform that person about how we collect, store, use and disclose the information (as set out in this Policy).

WHAT HAPPENS IF YOU DON'T PROVIDE PERSONAL INFORMATION TO US?

You do not have to provide us with personal information. However, if you choose not to provide the personal information that we ask for, you will not be able to use our services.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information about you from the following sources:

- When you contact us via live chat, phone or email.
- When you ask for information about our services.
- When you access and use our website. We use cookies on our website to collect information about your visit to our website so that we can improve our website. A cookie is a small data file placed on your computer by our server. Most browsers are setup to accept cookies, but these settings can be changed by you at any time.
- When you make an application to use our services.
- When you use our services.
- When you pay funds to us or withdraw funds from your trading account held with us.
- When you participate in surveys, news updates or promotions.
- Publicly available sources.
- Third party's where you have agreed to the release of such personal information to us from those third parties.

HOW WE MAY USE YOUR PERSONAL INFORMATION

We will only use your personal information for the purpose that it was collected for and we will only retain your personal information for so long as is required to fulfil the purpose that it was collected for and to meet our legal and regulatory obligations.

We may use your personal information for the following purposes and you authorise any third party to provide us with your personal information for these purposes as well:

- Verifying any information that we collect about you (whether that be from you or from a third party). This includes, among other things, carrying out checks required to satisfy our obligations under the Anti-Money Laundering and Countering Financing Terrorism Act 2009.
- Assessing your suitability to use our services.
- Providing you with the services that you have requested, providing assistance to you in relation to those services and managing and administering the services provided to you.
- Satisfying any obligation arising from any agreement between you and us.
- Contacting you with information about us, our services and other matters that we think may be of interest to you. You have the right to request that we cancel this service.
- Responding to your queries or any requests that you may have.
- Handling internal and external complaints handling and dispute resolution.
- Monitoring, operating, maintaining and improving our website.
- Complying with our legal and regulatory obligations or in connection with legal proceedings, crime or fraud prevention, detection or prosecution.
- Any specific purpose that we notify you of at the time of collecting your personal information.

You authorise any third party to provide your personal information to us for any of these purposes.

HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

We may disclose personal information that we hold about you to the following parties:

- Third parties for the purposes of carrying out checks to satisfy our obligations under the Anti-Money Laundering and Countering Financing Terrorism Act 2009.
- Third parties and service providers that assist us to deliver, improve and promote our services.
- Third parties in order to meet our legal or regulatory obligations.
- Financial institutions that we engage with in the course of doing business.
- External and professional service providers that provide services to us.
- Regulatory or government bodies.
- Entities within the Black Bull Group.
- Entities that may acquire an interest in us.
- To any person or entity with your express consent.
- For any purpose that is permitted under the Privacy Act.
- Where required by applicable law or any Court, or in response to a request by a law enforcement agency.

Some of the parties that we may disclose your personal information to may be located overseas. We require these entities to adhere to our standards of privacy, security and confidentiality.

We will not sell or rent your personal information to any third party.

HOW WE STORE AND PROTECT YOUR PERSONAL INFORMATION

We will take reasonable steps to ensure that personal information that we collect, use or disclose about you is accurate, complete, up-to-date and stored in a secure environment protected from unauthorised access, modification or disclosure.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

You may request a copy of the personal information that we hold about you. You may also require that we correct personal information that we hold about you if that information is misleading, inaccurate, incomplete or irrelevant. These requests can be made by contacting us at one of the following:

Address	Black Bull Group Limited Support Team Level 22 120 Albert Street Auckland CBD 1010 New Zealand
Email	support@blackbullmarkets.com

Where we receive a request from you, we will process that request within 15 working days.

We may refuse your request for a copy of the personal information that we hold about you or your request to correct your personal information in one of the following circumstances:

- Access would be unlawful.
- Access would prejudice enforcement action or actions relating to unlawful activity or serious misconduct.
- Denying access is required under New Zealand law or an order of a court or tribunal.

MARKETING COMMUNICATIONS

With your consent, we may send marketing and promotional messages to electronic addresses that you have provided to us. In providing your consent and by accepting the terms of this Policy, you are warranting and representing to us that you have the authority to provide this consent. You can revoke this consent at any time by contacting us using the details above or by “unsubscribe” from the marketing communications.

HOW WE AMEND THIS PRIVACY POLICY

This Policy is dated 01 May 2019. We may amend this Policy from time to time. You hereby deem to accept any changes to this Policy by virtue of using our services and/or our website. We will ensure that the current version of our Policy is available at all times on our website: <https://blackbullmarkets.com>.