



PRIVACY POLICY

29 March 2022

Privacy Policy

WHY DO WE HAVE A PRIVACY POLICY?

We understand the importance of honest and responsible use of your personal information. This Privacy Policy (**Policy**) explains how we collect, store, use and disclose personal information about you both in your day-to-day dealings with us and when you visit our website. In this Policy, **“we”, “our”, and “us”** means Black Bull Group Limited and its related companies (including BBG Limited).

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 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 number.
- Your bank account information, occupation, income and other information relating to your financial information.
- 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, including transactions and activities on accounts that you have with us.
- Any correspondence between us and you.
- Your marketing preferences.
- IP address and device type and ID.
- Other such information as required to satisfy our legal and regulatory obligations in connection with the services that we offer to you.

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 have met all other applicable legal obligations. You further 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 may not be able to use our services or parts of our website.

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.
- 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 parties 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 process your data when it is in our legitimate interests to do so and when these interests are not overridden by your data protection rights.

We may use your personal information for the following purposes:

- 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 identity verification and other 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.
- To further our relationship with you, including for our own marketing purposes.

- Responding to your queries or any requests that you may have.
- Handling internal and external complaints and dispute resolution.
- Monitoring, operating, maintaining and improving our website.
- For our internal research, development and optimisation of our services.
- Using de-identified information for our own purposes including market research, new product development and fraud mitigation.
- Complying with our legal and regulatory obligations or in connection with legal proceedings, crime or fraud prevention, detection or prosecution.
- To assess any job application if you apply for a job with us.
- 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.

SHARING YOUR PERSONAL INFORMATION

We may share personal information that we hold about you to the following parties and for the following purposes:

- Third parties for the purposes of carrying out identity verification and other checks required 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.
- Any platform provider we appoint, any trading participant that we appoint to facilitate trades on our behalf (acting as your agent) or any other person (including without limitation any agent of the above) for the purposes of or in connection with providing you 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 with which we are required to engage with in the course of doing business. This includes, without limitation, the Financial Markets Authority, the NZX Limited, Inland Revenue, Financial Investigations Unit, or any New Zealand or overseas financial market operator, law enforcement agency or regulatory body as required under applicable laws or where we believe the information will help prevent fraud, money laundering or other crimes.
- Entities that may acquire an interest in us or acquire part of our business.
- To any person or entity with your express consent.
- For any purpose that is permitted under the Privacy Act 2020 or relevant applicable law.
- Where required by applicable law or any Court, or in response to a request by a law enforcement agency.

We will not disclose this information without first taking reasonable steps to ensure that the information is accurate, up to date, complete, relevant and not misleading.

Where we disclose personal information to a third-party, we will require that comparable safeguards are in place to ensure such third-party is bound by substantially similar obligations as set out in this Policy and the Privacy Act 2020.

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

APPLICATION OF OVERSEAS PRIVACY LAWS

Our website and services can be accessed by people all over the world, including countries that may have different privacy laws to New Zealand. By visiting our website, accessing our services or otherwise providing us with your personal information, you acknowledge and agree that your personal information may be transferred, processed, used or stored by us and/or our third party services providers in countries other than New Zealand for the purposes set out in this Policy and otherwise in accordance with New Zealand law.

Where information is disclosed outside of New Zealand, unless we have your consent or an exception under the New Zealand Privacy Act 2020, we will take reasonable steps to ensure that the receiving party is required to protect your personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act 2020.

If you are located in a European Union Member State, to the extent that we are subject to the European Union General Data Protection Regulation 2016/679 ("**GDPR**"), we will comply with our obligations under the GDPR in relation to the processing of any personal information that we hold about you.

If you have any concerns regarding the transfer or disclosure of your personal information overseas, or if at any time you wish to withdraw your consent to such transfer and/or disclosure, you may do so in accordance with the Your Rights In Relation To Your Personal Information section below. However, please note that if you withdraw your consent, we may not be able to provide some or all of the services you have requested.

HOW WE STORE AND PROTECT YOUR PERSONAL INFORMATION

We will store your personal information as electronic records and in print form.

We will take reasonable steps to employ appropriate physical, technical and administrative security measures to help prevent loss, misuse, unauthorised access, disclosure or modification of your personal information.

There are inherent risks in transmitting information through the internet. You can help us to protect your privacy by observing our security requirements and contacting us immediately if your contact details change or if you believe your security measures have been compromised.

DURATION OF STORAGE

When we store your personal information, we will do so for as long as necessary to:

- Fulfil the specific purposes for which your personal information was collected;
- Perform the services that we have contracted to provide to you;
- Comply with our legal obligations or enforce our legal rights; or

- Meet our other legitimate purposes as otherwise permitted by the Privacy Act 2020.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

You have the right to review, access and request corrections to your personal information held by us.

In addition, you have the right to request further information about the handling of your personal information. If you wish to do so, or to notify us of a change in your details, you may contact us using the following details:

Address: Black Bull Group Limited, Level 20, 188 Quay Street, Auckland 1010, New Zealand

Email: Support@blackbullmarkets.com

Phone: [\(+64\) 9 558 5142](tel:+6495585142)

NZ (Toll Free) [0800 BB Markets](tel:+6495585142)

There may be some legal or administrative reasons to deny a request. If your request is denied, we will provide you with the reasons why, if possible, and you may ask us to attach a statement of your requested correction to your personal information.

If you have a question about the use of your personal information or wish to file a complaint about our use of it, please contact us using the contact details set out above.

If you have unresolved concerns, you also have the right to complain to the relevant data protection authority.

Where we receive a request from you, we will process it in the time periods set out by applicable law.

COOKIES AND THIRD-PARTY WEBSITES

Our website uses cookies and web server logs to collect information about how you use our website. We may serve third-party advertisements that use cookies and web beacons in the course of ads being served on our website. You have the ability to accept or decline cookies by modifying your web browser.

Please be aware that our website may contain links or references to third-party websites, and our Privacy Policy does not apply to those websites. We are not responsible for the content or information collection practices of those pages and take no responsibility for the privacy practices or security of other websites. We encourage you to review and understand their privacy practices before providing them with any information.

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 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 using the functional unsubscribe facility in any electronic communication sent from us or on our behalf.

AMENDMENTS TO THIS PRIVACY POLICY

This Policy is dated March 2022. We keep this Policy under regular review and may change it from time to time in order to reflect changes in the law and/or our privacy practices. You are deemed to accept any changes to this Policy by virtue of using our services and/or our website.

We encourage you to check the date of this Policy for any updates or changes when you visit our website or use our services. We will ensure that the current version of our Policy is available at all times on our website: <https://blackbullmarkets.com>.