Privacy Policy

Gleneagle Asset Management Limited trading as Fusion Markets (Fusion Markets)

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AFSL: 226199
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Risk Warning: Gleneagle Asset Management Limited (ABN 29 103 162 278) trading as Fusion Markets, is the issuer of the Fusion Markets Products described in this communication. Trading in Fusion Markets Products involves the potential for profit as well as the risk of loss which may vastly exceed the amount of your initial deposit and is not suitable for all investors. You should read all of these Financial Product Service Terms, the Product Disclosure Statement (PDS) and the Financial Services Guide (available on our website) carefully, consider your own financial situation, needs and objectives for investing in these Fusion Markets Products and obtain independent financial advice.
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1. Types of personal information We collect

We only collect personal information that is reasonably necessary for one or more of Our functions or activities. The types of personal information that We collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- other contact details such as social media handles;
- financial details such as your tax file number; and
- other information We think is necessary.

2. How We collect and hold personal information

We must collect personal information only by lawful and fair means.

We must collect your personal information from you unless it is unreasonable or impracticable to do so. For example, if We are unable to contact you and We then rely on publicly available information to update your contact details or if, at your request, We exchange information with your legal or financial advisers or other representatives.

We might collect your information when you fill out a form with us (either in hard copy or via our website), when We speak with you on the telephone, use Our website or face to face. We may also verify your information via electronic means, such as email.

If We receive personal information that We did not solicit, then within a reasonable period after receiving the information, We must determine whether or not We could have collected the information under Australian Privacy Principle 3 (collection of solicited personal information) if We had solicited the information and We may use or disclose the personal information to make this determination.

Then, if We determine that We could not have collected the personal information and the information is not contained in a Commonwealth record, We must, as soon as practicable but only if it is lawful and reasonable to do so, destroy the information or ensure that the information is de-identified. If however this does not apply in relation to the personal information, then Australian Privacy Principles 5 to 13 apply in relation to the information as if We had collected the information by solicitation.

3. Notifying you

When We receive personal information from you directly, We will take reasonable steps to notify you how and why we collected your information, who We may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Sometimes We collect your personal information from third parties. You may not be aware that We have done so. If We collect information that can be used to identify you, We will take reasonable steps to notify you of that collection.

4. The purposes for which We collect, hold, use and disclose personal information

We may collect information about you because We are required or authorised by law to collect it. There are laws that affect Us, including company and tax law, which require Us to collect personal information. For example, We may require personal information to verify your identity under the Anti-Money Laundering and Counter-Terrorism Commonwealth law.

If We collect and hold your personal information for a primary purpose, We will not use or disclose the information for a secondary purpose unless:

- you have consented to the use or disclosure of the information;
- you would reasonably expect Us to use or disclose the information for the other purpose and the other purpose is related to the first particular purpose;
- the use or disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order;
- a permitted general situation exists in relation to the use or disclosure of the information by Us; or
- We reasonably believe that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
5. **How you can access your personal information that We hold and seek the correction of such information**

We will always give you access to your personal information unless there are certain legal reasons why We cannot do so. We do not have to provide you with access to your personal information if:

- We believe there is a threat to life or public safety;
- there is an unreasonable impact on other individuals;
- the request is frivolous;
- the information wouldn’t be ordinarily accessible because of legal proceedings;
- it would prejudice negotiations with you;
- it would be unlawful;
- it would jeopardise taking action against serious misconduct by you;
- it would be likely to harm the activities of an enforcement body (e.g. the police); or
- it would harm the confidentiality of our commercial information.

If we cannot provide your information in the way you have requested, we will tell you why in writing. If you have concerns, you can complain by contacting us on +61 3 8376 2706 or you can send us an email to help@fusionmarkets.com

If you believe that is something wrong with the information, for example if you think that the information We hold is inaccurate, out of date, incomplete, irrelevant or misleading, please send us an email to help@fusionmarkets.com so we can update your details.

If you are worried that We have given incorrect information to others, you can ask us to tell them about the correction. We will correct this if We can or We will notify you if We are unable to change the details

You can ask us to access your personal information that We hold by sending us an email to help@fusionmarkets.com
6. **What effects does the GDPR have when accessing our sites / applications if you are an EU or UK citizen.**

The goal of GDPR is to protect EU citizens from the misuse or loss of their personal information. If you are a citizen of the EU/UK, the legislation assists by allowing you to:

1. Ask what personal data WE are collecting and how it is being used (“Right to be Informed”)
2. Unsubscribe from any of our emails at any time (“Right to Object”)
3. Access the personal data WE have collected about you (“Right to Access”)
4. Ask US to correct any inaccurate personal data (“Right to Rectification”)
5. Export your personal data in an electronic format (“Right to Data Portability”)
6. Require US to restrict processing of specific types of personal data (“Right to Restrict Processing”)
7. Opt out of having your personal data used for profiling and in automated systems (“Rights in Relation to Data Profiling”), and
8. Ask for your personal data to be deleted (and be provided with an audit trail if requested) and third parties to stop using the data (“Right to be Forgotten”).
9. How you can complain about a breach of the Australian Privacy Principles, or a registered APP code (if any) that binds Us, and how We will deal with such a complaint.

7. **How you can complain about a breach of the Australian Privacy Principles, or a registered APP code (if any) that binds Us, and how We will deal with such a complaint**

If an individual feels that We have breached our obligations in the handling, use or disclosure of their personal information, they may raise a complaint. We encourage individuals to discuss the situation with one of Our representatives in the first instance, before making a complaint.

The complaints handling process is as follows:

The individual should make the complaint including as much detail about the issue as possible, in writing to Us: The Complaints Department Fusion Markets Via email help@fusionmarkets.com Via Post mail: Level 7, 222 Exhibition St Melbourne VIC 3000
8. **Which overseas recipients and countries are We likely to disclose personal information**

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information We share with them under a foreign law. In those instances, We will not be responsible for that disclosure.

9. **Government Identifiers**

Sometimes We may be required to collect government-related identifiers such as your tax file number. We will not use or disclose this information unless We are authorised or required to do so by law or the use or disclosure of the identifier is reasonably necessary for Us to verify your identity for the purposes of Our business activities or functions.