FUSION MARKETS

Privacy Policy

Gleneagle Securities Pty Ltd trading as Fusion Markets (Fusion Markets)

fusionmarkets.com/en

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Number: 40256

PRIVACY POLICY

Gleneagle Securities Pty Limited ("Gleneagle") operates fusionmarkets.com and the Fusion Markets mobile application (the "App"), available on the Apple App Store and Google Play Store, and may operate other websites or applications. It is Gleneagle's policy to respect your privacy regarding any information we may collect while operating our website and the App (together, our "Platforms").

WEBSITE AND APP VISITORS

Like most website and app operators, Gleneagle collects non-personally-identifying information of the sort that web browsers, mobile operating systems and servers typically make available, such as the browser or device type, operating system and version, language preference, referring site, and the date and time of each visitor or App session. Gleneagle's purpose in collecting non-personally identifying information is to better understand how Gleneagle's visitors and App users use our Platforms. From time to time, Gleneagle may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website or App.

Gleneagle also collects potentially personally-identifying information like Internet Protocol (IP) addresses and device identifiers for logged in users and for users leaving comments on Fusion Markets' blogs/sites. Gleneagle only discloses logged in user and commenter IP addresses under the same circumstances that it uses and discloses personally-identifying information as described below, except that commenter IP addresses and email addresses are visible and disclosed to the administrators of the blog/site where the comment was left.

GATHERING OF PERSONALLY-IDENTIFYING INFORMATION

Certain visitors to Gleneagle's website and users of the App choose to interact with Gleneagle in ways that require Gleneagle to gather personally-identifying information. The amount and type of information that Gleneagle gathers depends on the nature of the interaction and the platform used. For example, we ask visitors and App users who sign up at Fusion Markets to provide a username and email address. Those who engage in transactions with Gleneagle are asked to provide additional information, including as necessary the personal and financial information required to process those transactions. In each case, Gleneagle collects such information only insofar as is necessary or appropriate to fulfil the purpose of the visitor's or App user's interaction with Gleneagle. Gleneagle does not disclose personally-identifying information other than as described below. Visitors and App users can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain website- or App-related activities, including trading.

INFORMATION COLLECTED THROUGH THE MOBILE APPLICATION

In addition to the categories of information described above, when you download, install and use the App we may collect the following categories of information, either automatically or where you grant the relevant device permission:

- Device and technical information: device model, operating system and version, unique device and advertising identifiers, mobile network information, and IP address, used for account security, service delivery and diagnostics.
- Location data: approximate or precise geolocation (where permitted by your device settings), used to help meet regulatory obligations (such as verifying your trading jurisdiction) and to prevent fraud. You can disable location access at any time in your device settings, which may limit certain App features.
- Camera and photo library access: used to capture or upload identification documents and supporting evidence for Know Your Customer (KYC) and Customer Due Diligence (CDD) verification, and to support customer service functions such as submitting screenshots for a support request or completing a liveliness check as part of an account withdrawal or account recovery step.
- Push notification data: a device token used to deliver alerts relating to your account, trading activity, price movements and service updates. You may opt out of push notifications in your device or App settings at any time.
- Biometric authentication data: if you choose to enable Face ID, fingerprint or other biometric login, the biometric match is performed and stored locally on your device by your device's operating system. Gleneagle does not receive, collect or store the underlying biometric data itself; we only receive confirmation that authentication was successful.
- In-app analytics and crash reporting: information about App performance, feature usage, session length and diagnostic/crash logs, collected to identify and fix technical issues and to improve the App experience.

Where the App requests access to a device permission (such as camera, photo library, location or notifications), your device will prompt you to grant or deny that permission before any related data is collected. You may withdraw a previously granted permission at any time through your device settings; doing so may limit or disable the App features that rely on that permission.

Information collected through the App is used and disclosed on the same basis, and subject to the same protections, as personally-identifying information collected through our website, as set out elsewhere in this Privacy Policy.

AGGREGATED STATISTICS

Gleneagle may collect statistics about the behaviour of visitors to its website and users of the App. Gleneagle may display this information publicly or provide it to others. However, Gleneagle does not disclose personally-identifying information other than as described below.

PROTECTION OF CERTAIN PERSONALLY IDENTIFYING INFORMATION

Gleneagle discloses potentially personally-identifying and personally-identifying information only to those of its employees, contractors and affiliated organizations that (i) need to know that information in order to process it on Gleneagle's behalf or to provide services available at Gleneagle's website or App, and (ii) that have agreed not to disclose it to others. Some of those employees, contractors and affiliated organizations may be located outside of your home country; by using Gleneagle's website or App, you consent to the transfer of such information to them. Gleneagle will not rent or sell potentially personally-identifying and personally-identifying information to anyone. Other than to its employees, contractors and affiliated organizations, as described above, Gleneagle discloses potentially personally-identifying and personally-identifying information only in response to a subpoena, court order or other governmental request, or when Gleneagle believes in good faith that disclosure is reasonably necessary to protect the property or rights of Gleneagle, third parties or the public at large. If you are a registered user of a Gleneagle website or the App and have supplied your email address, Gleneagle may occasionally send you an email or push notification to tell you about new features, solicit your feedback, or just keep you up to date with what's going on with Gleneagle and our products. If you send us a request (for example via email, the App or via one of our feedback mechanisms), we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users. Gleneagle takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally-identifying and personally-identifying information, including information collected through the App.

DATA RETENTION

Gleneagle retains personal information collected through our website and the App for as long as necessary to provide our services and to comply with our legal, regulatory and record-keeping obligations. In particular, Client account records, transaction records, identification and due diligence documentation, and related correspondence are retained for a period of seven (7) years from the end of the business relationship or the date of the relevant transaction, consistent with applicable anti-money laundering and financial services record-keeping requirements. Where applicable regulatory requirements specify a longer or shorter period for particular records, that period will apply instead. On expiry of the applicable retention period, Gleneagle will securely delete or anonymise the relevant personal information.

BUSINESS TRANSFERS

If Gleneagle, or substantially all of its assets, were acquired, or in the unlikely event that Gleneagle goes out of business or enters bankruptcy, user information — including information collected through the App — would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of Gleneagle may continue to use your personal information as set forth in this policy.

ADS

Ads appearing on any of our website or within the App may be delivered to users by advertising partners, who may set cookies or use mobile advertising identifiers. These allow the ad server to recognize your computer or device each time they send you an online advertisement, to compile

information about you or others who use your computer or device. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies and mobile advertising identifiers by Gleneagle and does not cover the use of cookies or identifiers by any advertisers.

PRIVACY POLICY CHANGES

Although most changes are likely to be minor, Gleneagle may change this Privacy Policy from time to time, and in Gleneagle's sole discretion, including to reflect new features of the website or App. Gleneagle encourages visitors and App users to frequently check this page, or the App's settings menu, for any changes to this Privacy Policy. If you have a Fusion Markets account, you might also receive an alert (by email or push notification) informing you of these changes. Your continued use of the website or App after any change in this Privacy Policy will constitute your acceptance of such change.