

Vtr Trade Ltd KYC Policy

SECTION A – INTRODUCTION 1. INTRODUCTION

1.1. Protecting your privacy and keeping your personal information confidential is of utmost importance to us. This KYC Policy (“Policy”) sets out how we collect and manage your personal and sensitive information in the safest and most secure manner.

1.2. In this Policy, we use the terms “we” “us” “our” or “Vtr Trade Ltd” to refer to Vtr Trade Ltd and its related companies.

1.3. Personal information includes any information or opinion about you that is capable (or reasonably capable) of identifying you, whether the information or opinion is true or not, and regardless of whether the information is recorded in a material form.

1.4. Sensitive information includes characteristics such as your racial or ethnic origin, political opinions or membership of political associations, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or criminal record. Your health, genetic and biometric information and biometric templates are also included under sensitive information. Sensitive information may also include personal information for the purposes of the Privacy Act.

1.5. We collect personal and/or sensitive information to provide you with the products and services that you ask for, as well as information about products and services offered by us or third parties.

1.6. We may use your personal and/or sensitive information to administer our products and services, for prudential and risk management purposes and, unless you tell us otherwise, to provide you with related marketing information.

We also use the information we hold to help detect and prevent illegal activity. We cooperate with police and other enforcement bodies as required by law.

1.7. We disclose relevant personal information to external organisations that help us provide services. These organisations are bound by confidentiality arrangements. They may include over- seas organisations.

SECTION B - COLLECTION OF PERSONAL INFORMATION 2. INFORMATION WE MAY COLLECT

2.1. The personal information we collect about you generally includes the following:

2.1.1. Name;

2.1.2. date of birth;

2.1.3. postal or email address; or

2.1.4. phone numbers, including home, mobile and work;

2.1.5. fax number;

2.1.6. information relating to an individual's source of wealth;

2.1.7. Occupation;

2.1.8. credit card details;

2.1.9. bank account details, including institution name, branch, account name, bank identifier, and account number or IBAN;

2.1.10. information relating to your trading experience;

2.1.11. identification documentation, as required under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 ("AML/CTF Act"), including:

2.1.11.1. Passport;

2.1.11.2. driving licence;

2.1.11.3. national identity card;

2.1.11.4. utility bills;

2.1.11.5. trust deed;

2.1.12. other information we consider necessary to our functions and activities.

2.2. We are required by law to identify you if you are opening a new account or adding a new signatory to an existing account. The AML/CTF Act requires us to sight and record details of certain documents (i.e. photographic and non-photographic documents).

2.3. Where necessary, we also collect information on the following individuals:

2.3.1. Trustees;

2.3.2. Partners;

2.3.3. company directors and officers;

2.3.4. officers of co-operatives and associations;

2.3.5. client's agents;

2.3.6. beneficial owners of the client; and

2.3.7. persons dealing with us on a "one-off" basis.

2.4. We may take steps to verify the information we collect. For example, the birth certificate you have provided as identification may be verified with records held by the Registry of Births, Deaths and Marriages to protect against impersonation, or we may verify with an employer that employment and remuneration information provided in a credit application is accurate.

3. HOW WE COLLECT PERSONAL INFORMATION

3.1. We may either collect personal information about you directly from you or from sources other than you when permitted under the AML/CTF Act. "Sources other than you" may include your agents, family members, friends, related entities, affiliates or divisions.

3.2. We may also collect information from you electronically, for instance, when you visit our web- site.

4. INCOMPLETE OR INACCURATE INFORMATION

4.1. If you provide us with incomplete or inaccurate information, we may not be able to provide you with the products or services that you ask for.

5. CONSENT

5.1. In most cases, we will obtain your consent to use and disclose your personal information for our intended purposes either before or at the time that we collect it.

5.2. If you do not give us your consent or withdraw your consent, we may not be able to provide you with the products or services you ask for.

6. WITHDRAWING CONSENT

6.1. You can withdraw your consent at any time. To withdraw your consent, please email at support@vtrtradeltd.com at the first instance.

7. SENSITIVE INFORMATION

7.1. We will only collect sensitive information about you if we have your consent, or if we are required or authorised by law to do so.

SECTION C – INTEGRITY OF YOUR PERSONAL INFORMATION 8. QUALITY OF PERSONAL INFORMATION

8.1. We ensure that the personal information we collect and handle are accurate, up to date, complete and relevant.

8.2. Please contact us if any of the details you have provided to us change or if you believe that the information we have about you is not accurate or up to date.

8.3. We may also take steps to update the personal information we hold, for example, an address, by collecting personal information from publicly available sources such as telephone directories or electoral rolls.

9. SECURITY OF PERSONAL INFORMATION

9.1. We are committed to protecting the personal information we hold about you from misuse, unauthorised access and disclosure.

9.2. We have implemented a range of practices and policies to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them.

9.3. Our security measures include:

9.3.1. Educating our employees about their obligations when they collect and handle personal information;

9.3.2. Requiring our employees to use passwords when accessing our systems;

9.3.3. Encrypting data sent from your computer to our systems during internet transactions and client access codes transmitted across networks;

9.3.4. Employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems;

9.3.5. Using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing; and

9.3.6. Practising a clean desk policy for all premises and providing secure storage for physical records.

9.4. Where we identify that we no longer need certain personal information, we ensure that it is effectively and securely destroyed. For example, we may shred paper records or use other means such as degaussing (de-magnetism of a device) and deletion in the case of electronic equipment and records.

SECTION D – USE OR DISCLOSURE OF PERSONAL INFORMATION 10. WHO WE DISCLOSE PERSONAL INFORMATION TO

10.1. We may share your information with our related entities and third parties that we outsource functions to or partner with, in certain limited situations where it is necessary for us to provide our products and services or perform associated business activities.

10.2. These entities and third parties include:

10.2.1. Brokers and agents who refer your business to us;

10.2.2. Our third-party business partners or joint initiative providers;

10.2.3. Auditors we appoint to ensure the integrity of our operations; 10.2.4. Any person acting on your behalf, including your financial adviser, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;

10.2.5. Your employment referee (to confirm details about you);

10.2.6. If required or authorised to do so, regulatory bodies and government agencies;

10.2.7. Credit reporting agencies;

10.2.8. Other financial institutions and organisations that you seek credit from them (at their request, so that they may assess whether to offer you credit); and

10.2.9. Other organisations who assist us to provide products and services by performing functions such as client contact, banking, payments, data processing, debt recovery, marketing and advertising, data analysis, business intelligence, website and technology services. They may also provide products and services that integrate with or complement our products and services. 10.2.10. We take our obligations to protect your information extremely seriously and make every effort to deal only with parties who share and demonstrate the same attitude. Each of the third parties that we contract with is carefully selected and is only authorised to use your personal information in a secure way that is necessary for them to perform their services to us.



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11. DISCLOSURE REQUIRED BY LAW

11.1. We will also reserve the right to disclose your personal information if we are required by law or permitted to do so under the Privacy Act.

SECTION E – CONTACTING US 12. CONTACT

19.1. If you have any questions or would like further information about our privacy and information handling practices, please contact us using one of the following channels:

19.1.1. Email: support@vtrtradeltd.com

Vtr Trade Ltd

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