



**MAIN GROUP FX**  
**TRADE BETTER. GAIN MORE.**

## Privacy Policy



## PRIVACY POLICY

Updated on 25th July 2023

[www.maingroupfx.com.au](http://www.maingroupfx.com.au)

[support@maingroupfx.com.au](mailto:support@maingroupfx.com.au)

+61861660861

REGULATION: Main Group FX Pty Ltd (ACN: 665 904 236)

### 1. INTRODUCTION

Main Group FX is a trading name for MAIN GROUP FX PTY LTD.

MAIN GROUP FX PTY LTD is a company registered and authorized under the Australian Securities and Investments Commissions, under ACN 665 904 236, ABN 44 665 904 236 with a registered office at 465 Victoria Ave, Chatswood, NSW 2067, Australia.

This Policy applies to MAIN GROUP FX PTY LTD, in which the following terms “we”, “us”, “the company” or “Main Group FX” are used to refer to MAIN GROUP FX PTY LTD and its related companies.

This Privacy Policy (“Policy”) outlines our obligations on how we collect and manage your personal and sensitive information, in compliance with the Privacy Act 1988 (Cth) (“Privacy Act”) and the Australian Privacy Principles (“APPs”).

Your privacy and the confidentiality of your personal information are very important to us. If applicable, we may collect and use your personal information in accordance with our Privacy Notice.

### DEFINITION OF TERMS

- “Personal information” means information that can be used to identify, locate, or contact an individual, alone or when combined with other personal or identifying information.
- “Sensitive information” includes things like your racial or ethnic origin, political beliefs or associational membership, religious or philosophical convictions, union membership, professional or trade association membership, sexual orientation, or criminal history. Your health, genetic, biometric, and biometric templates information is also sensitive. For the purposes of the Privacy Act, sensitive information qualifies as personal information as well.

To provide you with the goods and services you request, as well as details about goods and services offered by us or by third parties, we gather personal and/or sensitive information.

REGULATION: Main Group FX Pty Ltd (ACN: 665 904 236)

Unless you tell us otherwise, we may use your personal and/or sensitive information to administer our services and products, for risk management and prudential purposes, and to send you relevant marketing materials. We also use the data we have on hand to help catch and stop criminal activity. As required by law, we work with law enforcement officials like the police.

- “Credit information” is personal information (other than sensitive information) that relates to an individual’s credit history or credit worthiness, and is further defined in the Privacy Act;
- “Disclosing” information means providing information to external organizations that help us provide services. These organisations are bound by confidentiality arrangements. They may include overseas organisations.

You have the right to request access to the personal data we have on file for you. Please let us know if the data we have on you is incorrect, incomplete, or out of date so we can update it. If we refuse to give you access to your personal information, we'll explain why. Instead of giving you direct access to evaluative information associated with a decision, for instance, we might explain a commercially sensitive decision or give you access to the information through a mutually agreed-upon intermediary.

## **2. COLLECTION OF PERSONAL INFORMATION**

We collect and hold the following kinds of personal information about individuals:

- name;
- postal / email address
- contact details;
- date of birth;
- information relating to an individual’s source of wealth;
- occupation;
- credit card details if expressly authorised by the individual);
- bank account details, including institution name, branch, account name, bank identifier, and account number or IBAN;
- trading history;
- identification documentation, as required under the Anti Money Laundering and Counter Terrorism Financing Act 2006 (“AML/CTF Act”), including:
  - (i) passport;
  - (ii) driver’s licence;
  - (iii) national identity card;
  - (iv) utility bills;
  - (v) trust deed;
- any additional details that are pertinent to the services we offer or that we deem necessary for our operations and activities
- We might take measures to confirm the data we gather. To prevent impersonation, for instance, a birth certificate provided as identification might be cross-referenced with data from the Registry of Births, Deaths, and Marriages. Similarly, we might call an employer to confirm the accuracy of employment and compensation information provided in a credit application.



If you visit a social media page run by us, the data we gather about you may also include your user ID and/or user name linked to that social media service, any information or materials you have given the third-party social media service permission to share with us, like your profile picture, email address, followers or friends lists, and any data you have made public in connection with that social media service.

Through online browsing, mobile or tablet applications, or other means, we will gather information about you. We keep track of your online activity each time you visit our website. When you visit our site, we could use a piece of technology called a "cookie." Cookies have the ability to store data about your visit to our site. Our cookies cannot access your hard drive, gather data from your browser, or instruct your computer to take any specific action. They are made to be undeliverable and unable to be retrieved by or sent to any other website.

For instance, to respond to a query regarding your account, we might ask you to send us your information via private messaging. In order to participate in other activities, such as competitions, you might also be asked to share your personal information through secure channels.

## **2. SECTION A – HOW WE COLLECT PERSONAL INFORMATION**

We are only allowed to collect personal data in a legal and ethical manner. We may gather personal information, for instance, when someone calls us, visits our website, fills out an online account application form, or sends us a letter. At times, we might obtain personal data about the person from a third party. We will make reasonable efforts to ensure that the person is or has been informed of the issues outlined in this Privacy Policy when we receive personal information from a third party. To help us evaluate a person's application to open an account, we may also obtain credit information about that person from credit reporting agencies.

### **SENSITIVE INFORMATION**

Unless the person's consent has been obtained or an exemption under the APPs applies, Main Group Fx will not collect sensitive information. Among these exceptions are situations in which the collection is mandated or authorized by law or required to take appropriate action in response to suspected illegal activity or grave misconduct.

### **INCOMPLETE OR INACCURATE INFORMATION**

If a person does not provide the personal information we ask for, we might not be able to offer them the benefits of our services or properly meet their needs. We might be able to provide you with the option to use a pseudonym or maintain your anonymity when dealing with us in certain circumstances. This option is only available to you if it is practical for us to do so and if doing so would not violate any legal requirements.

### **ANONYMITY AND PSEUDONYMITY**

Due to the Anti-Money Laundering and Counter Terrorism Financing Act 2006's requirement that Main Group Fx identify all trading clients, individuals are not given the option to transact with them anonymously or under a pseudonym. Additionally, dealing with people who have not identified themselves or who use a pseudonym is impractical for Main Group Fx.

## **CONSENT**

Before or at the time we collect your personal information, we will typically ask for your permission to use and disclose it for the purposes for which it was collected. We might not be able to give you the goods or services you request if you refuse to consent or withdraw your consent.

## **WITHDRAWING CONSENT**

You can withdraw your consent at any time. To withdraw your consent, please email [support@maingroupfx.com.au](mailto:support@maingroupfx.com.au) in the first instance.

## **DEALING WITH Unsolicited personal information**

If we receive personal information that we did not solicit then:

- You have given your consent to the information collection, or it was not practical or reasonable for us to obtain your consent under the circumstances.
- The information collected is reasonably necessary for us to conduct business with you.

When these circumstances occur, we will either delete or de-identify the information.

If the unsolicited information we receive about you is sensitive information, we will obtain your permission before keeping it, regardless of the situation, and we must either destroy the information right away or make sure it is de-identified.

## **2. SECTION B - ABOUT WHOM DO WE COLLECT PERSONAL INFORMATION?**

The personal information we may collect and hold includes (but is not limited to) personal information about the following individuals:

- clients;
- potential clients;
- introducing brokers, affiliates and money managers;
- service providers or suppliers;
- prospective employees, employees and contractors; and
- other third parties with whom we come into contact.

If necessary, we will also collect information about individuals such as:

- trustees;
- partners (of legal partnerships)
- company directors and offices
- officers of co-operatives and associations
- agents nominated by the individual;
- beneficial owners of the client, and
- other third parties dealing with us on a 'one-off' basis.

## 2. SECTION C - WHY WE COLLECT YOUR PERSONAL INFORMATION

We only collect personal information when it's reasonably necessary for us to do business with you.

We use personal information to:

- verify your identity
- provide you with the products and services that you've asked for
- help up monitor, evaluate and develop our products and services
- unless you tell us otherwise, keep you informed about our products and services and those of our relevant business and initiative partners, and tailor this information to your needs and interests;
- respond to any feedback, queries or complaints;
- provide you with technical support;
- participate in any third-party acquisitions or potential acquisition of an interest in us or our assets;
- to comply with relevant laws, regulations and other legal obligations including the Corporations Act 2001 and the Anti-Money Laundering and Counter Terrorism Financing Act 2006;
- take measures to detect and prevent fraud, crime or other activity which may cause harm to our business or our products and services.

## 2. SECTION D - INTEGRITY OF YOUR PERSONAL INFORMATION

### QUALITY OF YOUR PERSONAL INFORMATION

1. We take steps to ensure that the personal data we gather and manage is true, current, complete, and pertinent.
2. If any of the information you've given us changes, or if you think the data we have on you is outdated or inaccurate, kindly get in touch with us.
3. We may also collect personal information from publicly accessible sources, such as telephone directories or electoral rolls, in order to update the personal information we currently hold, such as an address.

### SECURITY OF PERSONAL INFORMATION

The importance of protecting our clients' personal information is something Main Group Fx is aware of. We are committed to protecting the personal information we hold about you from misuse, and we will always work to ensure that it is protected from inference, misuse or loss, unauthorised access, modification or disclosure.

We've started going over a variety of procedures and regulations to guarantee a strong security setting. We regularly evaluate these measures to make sure they remain effective.

#### **Our security measures include:**

Main Group Fx' employees must respect the confidentiality of the personal information we collect. We hold all of your personal information in secure computer storage facilities and in paper-based files.

- requiring our employees to use passwords when accessing our systems;

- encrypting data sent from your computer to our systems during internet transactions and client access transmitted across networks;
- employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorized persons and viruses from entering our systems,
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- practicing a clean desk policy for all premises and providing secure storage for physical records; and
- employing physical and electronic security measures such as swipe cards, alarms, cameras and guards (as required) to protect against unauthorized access to buildings.

We will keep your personal information for as long as is necessary to fulfill your requests for products, services, information, and to carry out and manage your business relationship with us. In accordance with applicable law, we are also required to maintain certain information (such as that relating to business or tax-related transactions) for specific retention intervals.

When we identify that we no longer require a particular piece of personal information, we take steps to ensure that it is securely and effectively destroyed. In the case of electronic equipment and records, for instance, we might degauss (de-magnetize a device) and detect, or we might shred paper records.

### **3. USE AND DISCLOSURE OF PERSONAL INFORMATION**

#### **3. SECTION A - WHO WE DISCLOSE PERSONAL INFORMATION TO**

Main Group Fx may use and disclose personal information for the primary purposes for which it is collected (see point 2, section B above) for reasonably expected secondary purposes which are related to the primary purpose and in other circumstances authorised by the Privacy Act.

These entities and third parties include:

- a)brokers and agents who refer your business to us;
- b)our third-party business partners or joint initiative providers;
- c)auditors we appoint to ensure the integrity of our operations;
- d)any person acting on your behalf, including your financial adviser, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
- e)your employment referee (to confirm details about you);
- f)if required or authorised to do so, regulatory bodies and government agencies;
- g)credit reporting agencies;
- h)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
- i)other companies that help us by handling tasks like customer service, banking, payments, data processing, debt recovery, marketing, advertising, data analysis, business intelligence, website maintenance, and technology services. Additionally, they might offer goods and services that work well with or add to ours.

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's necessary for them to perform their services to us.

### **3. SECTION B – OVERSEAS RECIPIENTS**

We may disclose your personal information to overseas recipients.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

We will take all reasonable precautions before disclosing your personal information to an overseas recipient to make sure that:

- (a) the recipient does not violate the Australian Privacy Principles;
- (b) the recipient is subject to a law, or binding scheme, that has the effect of protecting the information generally in a manner that is at least substantially similar to how the Australian Privacy Principles protect the information; or
- (c) you have given your consent. Acceptance of any of our services through a written, verbal, or electronic application will be construed as consent to the disclosures outlined in this section.

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's necessary for them to perform their services to us.

Disclosure required by law:

We also disclose your personal information if we're required by law or permitted to do so under the Privacy Act.

Main Group Fx will use your personal information for any of the following purposes:

- organizing, carrying out, managing, and overseeing the contractual business relationship you (or a third party to whom you are related) have with us, such as by giving you support services or other products or services you may have asked for;
- upholding and safeguarding the safety of our services, goods, websites, and other systems, and detecting and preventing security threats, fraud, and other nefarious or unlawful activity;
- ensuring that we follow all of our legal and regulatory requirements. This could include keeping sales records for tax or other purposes, sending necessary notices or other disclosures, and screening or recording obligations for compliance (e.g., under antitrust laws, export laws, trade sanction and embargo laws, or to stop white-collar or money laundering crimes). In this case, we might have to record interactions with you that might be important for antitrust purposes, run automated checks of your contact information or other identity-related information against relevant sanctioned-party lists, and contact you to confirm your identity in the event of a potential match; additionally, we might have to report to or assist with investigations by competent supervisory, law enforcement, or other public authorities;
- solving disputes, enforcing our contractual agreements and to establish, exercise or defend legal claims.



- where you have expressly given us your consent or otherwise legally permitted, we may process your personal data also for the following purposes:
- communicating with you through the channels you have approved to keep you up to date on the latest announcements, special offers and other information about Main Group Fx's products, technologies and services (including marketing-related newsletters) as well as events and projects which we are pursuing.

Unless the individual specifically agrees otherwise or as permitted by law, sensitive information will only be used and disclosed for the purpose for which it was provided or a directly related secondary purpose.

We hire other people to complete tasks for us, and they may handle the personal data we have on file. In these circumstances, we forbid the recipient from using a person's personal information for any other reason than the one for which it was provided. We forbid that person from using the person's information to market their goods or services directly to that person.

Wherever possible, Main Group Fx will make an effort to delete or de-identify sensitive information. Additionally, we promise to take all necessary steps to remove a person's identity from any remaining personal information when it is no longer required.

#### **4. ACCESS TO YOUR PERSONAL INFORMATION**

You can request at any time to let you know what personal data we have about you. Normally, we respond to your request within five days of receiving it. Email us at [support@maingroupfx.com.au](mailto:support@maingroupfx.com.au) if you would like to access or update any of the personal information we hold about you.

If we reasonably believe that granting access would seriously jeopardize someone's life, health, or safety, have an unreasonably negative impact on their right to privacy, or if we find the request to be frivolous, we may refuse to grant you access to the personal information we hold about you.

#### **5. COOKIES**

##### **What is a cookie?**

A cookie is a small file which asks permission to be placed on your computer's hard drive. If your computer settings allow cookies, then the file is added and the cookie helps analyse web traffic or lets the site owner know when you visit a particular site.

##### **Why Use cookies**

Cookies help us provide you with a better website by enabling us to monitor the pages that you find useful and tailor our website to your needs, likes and dislikes by gathering and remembering information about your preferences.

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about your browsing actions and patterns, and doesn't identify you or anyone else as an individual.

We may disclose the data we collect through cookies to our related companies.

Once a client visits our web site [www.maingroupfx.com.au](http://www.maingroupfx.com.au) campaign and advertising cookies will be placed in a client's device so that we can track the client, measure advertising outcome along with recording client interest.

Cookies used by us and our partners do not collect personal information such as name, email, address or phone number.

### **How to block Cookies**

Clients can disable cookies from their browser however we encourage them to keep cookies enabled for a better site experience and to receive targeted materials from us.

Most web browsers allow you to adjust settings to erase cookies, disallow cookies, or receive a warning before a cookie is set. Please note that some parts of our websites may not function fully if you disallow cookies.

## **6. COMPLAINTS**

Please send us an email at [compliance@maingroupfx.com.au](mailto:compliance@maingroupfx.com.au) if you have any concerns about how your personal information is being handled. We will document your complaint and take action to make any infractions of Australian Privacy Principles right.

We will acknowledge your complaint within five days. We will provide you with a decision on your complaint within twenty-eight days.

If you are dissatisfied with the response of our complaints officer you may make a complaint to the Privacy Commissioner which can be contacted on either [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

### **Updates to this policy**

This Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

### **Responsibilities**

It is the responsibility of management to inform employees and other relevant third parties about the Main Group Fx' Privacy Policy, including any changes to the Privacy Policy. It is the responsibility of all employees and other relevant parties to ensure that they understand and comply with this Privacy Policy.

### **Privacy training**

All new employees are provided with timely and appropriate access to Main Group Fx' Privacy Policy. All employees are provided with opportunities to attend privacy training, which covers Main Group Fx' obligations under the Act and the APPs.

### **Non-compliance and disciplinary actions**

Privacy breaches must be reported to management by employees and relevant third parties. Ignorance of the Main Group Fx' Privacy Policy will not be an acceptable excuse for non-compliance. Employees or other relevant third parties that do not comply with Main Group Fx' Privacy Policy may be subject to disciplinary action.

### **Contractual arrangements with third parties**

Main Group Fx must ensure that all contractual arrangements with third parties adequately address privacy issues. Main Group Fx will make third parties aware of this Privacy Policy. Third parties will be required to implement policies in relation to the management of an individual's personal information in accordance with the Privacy Act.

These policies include:

- regulating the collection, use and disclosure of personal and sensitive information;
- de-identifying personal and sensitive information wherever possible;
- ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties; and
- ensuring that the personal and sensitive information is only disclosed to organisations which are approved by Main Group Fx.

### More information

For more information about any issue raised in this Privacy Policy or any other concerns, please contact us:

Phone: [+61861660861](tel:+61861660861)

Email: [support@maingroupfx.com.au](mailto:support@maingroupfx.com.au)

For more information about privacy in general, you can visit the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).



**MAIN GROUP FX**  
**TRADE BETTER. GAIN MORE.**