

Privacy Policy



TOTALITY

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At Totality Wealth Limited, ABN 32 110 128 286 (“**Totality, we, our, us**”), we are committed to protecting the privacy of our clients. We are bound by the Australian Privacy Principles (APPs) and the Privacy Act 1988 (Cth) (Privacy Act) and will ensure we meet our requirements in our dealings with you.

THIS APP PRIVACY POLICY SETS OUT:

- a. The kinds of personal information we collect and hold;
- b. How we collect and hold personal information;
- c. The purpose for which we collect, hold, use and disclose personal information;
- d. How clients may access personal information about themselves, that is held by us, and seek correction of such information;
- e. How a client may lodge a complaint about a breach of the APPs by us, and how we will deal with such a complaint;
- f. Whether we are likely to disclose personal information to overseas recipients, and countries in which such recipients are likely to be located;

and our approaches to:

- g. Anonymity
- h. Sensitive information
- i. Consequences of failing to provide information
- j. Unsolicited personal information
- k. Direct Marketing Communication
- l. Security and protecting your personal information

A) THE KINDS OF PERSONAL INFORMATION WE COLLECT AND HOLD;

Information which we may collect from you includes, but is not limited to: your full name; date of birth; email address; residential, postal and business address; phone numbers; tax file numbers; drivers licence details; Medicare number; passport details; financial details; occupation; bank account details; and any other information we may consider necessary to undertake our activities.

B) HOW WE COLLECT AND HOLD PERSONAL INFORMATION;

Where reasonable and practicable, we will endeavour to collect your personal information from you via our client application form; this can either be a paper-based application form or an online application form. We may collect information from you via phone and email also. In certain situations we may collect personal information about you from third parties, such as your introducing broker, financial adviser, accountant, employer, and further those listed under names of entities we may disclose your information to, see below. If we have collected personal information about you from third parties not disclosed in this privacy policy, we will

advise you of this as soon as practical, if not at or before the time of collection, the fact that we have collected the information and the circumstances of the collection. Further, we may also request for information from you via market research, surveys and questionnaires, these requests are voluntary.

Once we have collected your personal information, we will store this in our internal CRM system, secured office onsite, or in a secured storage facility.

C) THE PURPOSE FOR WHICH WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

Where reasonable and practicable, we will endeavour to collect your personal information from you via our client application form; this can either be a paper-based application form or an online application form. We may collect information from you via phone and email also. In certain situations we may collect personal information about you from third parties, such as your introducing broker, financial adviser, accountant, employer, and further those listed under names of entities we may disclose your information to, see below. If we have collected personal information about you from third parties not disclosed in this privacy policy, we will advise you of this as soon as practical, if not at or before the time of collection, the fact that we have collected the information and the circumstances of the collection. Further, we may also request for information from you via market research, surveys and questionnaires, these requests are voluntary.

We collect, hold and use your personal information for the purpose of:

- providing you with products or services provided by Totality or a related company, including assessing your application, administering any facility you have with us, executing instructions and complying with our legislative and regulatory obligations relating to the product or service;
- meeting our ongoing obligations to you in providing you with the product or service;
- meeting our external obligations, such as with regard to third party systems and relationships, in order to provide you with the product or service;
- meeting our obligations under applicable laws, such as customer identification requirements under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and compliance requirements under the Corporations Act 2001 (Cth) and other legislation governing the provision of financial services;
- protecting against fraud; and
- to contact you with information about products or services that you might be interested in,
- for company marketing purposes. Should you not agree to your information being used, you can opt-out of receiving future marketing communications directly via your device platform linked to your device-ID,
- request for feedback and information from you, via market research and surveys regarding our product and services; as well for other purposes we may disclose your information to third party entities.

We may disclose your information for such purposes to other organisations:

- external service providers involved in our provision of products and services to you, such as mailing houses, call centres, debt collector agencies, professional advisers (such as our lawyers and compliance advisers), internal and external auditors;
- our shareholders, and any associated companies and subsidiaries assisting in providing you with financial products and services.
- online application technology providers;
- identity verification services providers;
- to any potential purchaser of the whole or part of our business (or any other relevant party advisers such as that), on a confidential basis;
- your agents, advisers or lawyers, such as where you have obtained a service from us through them or are otherwise dealing with us in any way through them;
- parties involved in markets and systems related to the products and services we provide to you, such as market operators and participants, counterparties, intermediaries and custodians;
- entities involved in any corporate re-organisation affecting us;
- entities assisting us to maintain and improve our systems, products and services;
- credit reporting agencies;
- entities to whom we are required or authorised by law to disclose your personal information, such as government and regulatory bodies.

D) HOW CLIENTS MAY ACCESS PERSONAL INFORMATION ABOUT THEMSELVES, THAT IS HELD BY US, AND CORRECTION OF SUCH INFORMATION

You have the right to request access to your personal information which we hold. Your access rights are subject to some exceptions permitted by law. We will respond to your request in accordance with the Privacy Act and any other law which affects this obligation. A fee may be payable if you request a copy of your information. If we deny your access request, we will provide you with written reasons for doing so. If you wish to lodge a complaint in reference to this refusal, you may do so via the details provided in e) below.

We aim to keep the personal information we hold about you up to date. Should any of your personal details change, or if you believe that information, we hold about you is incorrect please let us know so we can correct this. If we refuse your request to correct information, we will generally give you a written reason for the refusal. If you wish to lodge a complaint in reference to this refusal, you may do so via the details provided in e) below.

F) HOW A CLIENT MAY LODGE A COMPLAINT ABOUT A BREACH OF THE APP BY US, AND HOW WE WILL DEAL WITH SUCH A COMPLAINT;

For any privacy related feedback, or complaints, please send via the Trading Platform or your written request to:

Privacy Policy



Totality Wealth Limited

Email: Compliance@Totality.com.au

Postal Address: Suite 1, Level 14, 9 Castlereagh St, Sydney NSW 2000, Australia

Phone: +61 2 8267 9000

Fax: +61 2 8267 9050

If you are not satisfied with a response received from Totality in reference to a privacy complaint, or feel that Totality may have breached an Australian Privacy Principle, then you have the right to refer the complaint directly to the Office of the Australian Information Commissioner (OAIC), previously known as Office of the Privacy Commissioner. A complaint form may be lodged via the OAIC website, or via the details below.

For provisions of the Privacy Act, please refer to the website www.oaic.gov.au

Office of the Australian Information Commissioner

Email: enquiries@oaic.gov.au

Phone: 1300 363 992

Address: GPO Box 5218 Sydney NSW 2001

Fax: +61 2 9284 9666

www.oaic.gov.au

As per Totality's IDR – complaints handling policy, if you lodged a written complaint with Totality, you should receive a response within 1 business day from the date Totality receives the written formal complaint. The written complaint will be dealt by the Compliance department and potentially the Account Executive managing the account. If additional time is required to resolve the complaint, the compliance department will inform you of this. Totality aims to resolve a complaint as soon as possible, and within 30 days.

If you are still not satisfied with Totality's response, you can then proceed to lodge a formal complaint with OAIC.

G) WHETHER WE ARE LIKELY TO DISCLOSE PERSONAL INFORMATION TO OVERSEAS RECIPIENTS, AND COUNTRIES IN WHICH SUCH RECIPIENTS MAY BE LIKELY TO BE LOCATED.

Totality may disclose your personal information to related entities and service providers, some of whom may be based outside Australia. In the case of such disclosures, the recipients are likely to be located in Europe including Denmark, Singapore, India and South Africa. You consent to your personal information being transferred to such entities for the purpose of operating your trading account.

H) ANONYMITY

Under the Privacy Act you have the right to deal with us anonymously where this is lawful and practicable. For example, this can sometimes be the case when you are enquiring about our products and services. However, in situations where we may need to take instructions from you or implement a change to your account, this may not be appropriate and in compliance with AML/CTF rules and regulations.

I) SENSITIVE INFORMATION

While we usually do not need to collect sensitive information about you (such as health information; information about racial or ethnic origin; criminal record information), if we require such information we will

generally only collect it with your consent. This is subject to exceptions, such as where the collective is required by law or necessary to establish or defend a legal claim.

J) CONSEQUENCES OF FAILING TO PROVIDE INFORMATION

If you do not provide us with any requested personal information, this may mean that we are unable to provide you with financial products or services, or potentially pursue the relationship you have as a client with Totality.

K) UNSOLICITED PERSONAL INFORMATION

If we have received unsolicited personal information regarding you, which we did not solicit, we will as soon as practical, destroy the information, or ensure the information is de-identified. However, if it is information which is provided to us in a situation where it is mingled or attached with information that we have requested, you acknowledge that this information may be held by us as described in this policy.

L) DIRECT MARKETING COMMUNICATION

Totality may from time to time send you information regarding our current and upcoming products and services, events being held by Totality, surveys and/or request for feedback on how we can improve on our products and services to you as a client, or information we may consider of interest to you. Such communication will be sent to you via the personal details you provide to us in the client application form, commonly your registered email address. If you do not wish to receive such information, please email enquiries@totality.com.au or you may submit a request to unsubscribe from receiving such information via the actual communication email.

We collect or store user information on our website by using “cookies” (small files placed on your computer by some websites you have visited) for marketing purposes, such as displaying pages that are more relevant to your preferences.

M) SECURITY AND PROTECTING YOUR PERSONAL INFORMATION

The security of your personal information is important to us and so we take reasonable steps to protect it from misuse, loss and unauthorized access or disclosure. Such steps include:

- Written confidentiality and security policies that apply to all our employees;
- Security measures for access to our systems and premises and for document and file storage;
- By reasonably limiting internal access to clients' personal information to staff who require it to fulfil our obligations towards to and related matters; and
- Firewall and data encryption measures protecting our website.

At times you can access other organisation's websites through links on our websites. Please note that we are not responsible for the privacy standards and processes of those organisations and external websites. It is recommended that you read and understand their privacy policy.

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N) EUROPEAN GENERAL DATA PROTECTION REGULATION (EU GDPR)

In the event that the EU GDPR requires a higher level of protection for the personal data of individuals in EU than local law, Totality shall comply with such stricter requirements.

Pursuant to Article 27 of the EU GDPR, Totality has appointed Saxo Bank A/S as our representative in the EU.