



PRIVACY POLICY

October 2020

Black Bull Group Limited

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New Zealand

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Privacy Policy

WHY DO WE HAVE A PRIVACY POLICY?

We understand the importance of honest and responsible use of your personal information. This Privacy Policy (Policy) explains how we collect, store, use and disclose personal information about you both in your day-to-day dealings with us and when you visit our website. In this Policy, “**we**”, “**our**” and “**us**” means BlackBull Markets.

For the purposes of this Policy, we have referred to the information that we collect about you as “**personal information**”.

AGREEING TO THIS PRIVACY POLICY

By accessing our website and using our services, you consent to the collection, storage, use, and disclosure of your personal information in accordance with this Policy.

WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

We collect the following personal information about you:

- Your name and date of birth.
- Your email address, residential address and contact telephone number.
- Your bank account information, occupation, income and other information relating to your financial information.
- Specific documents to verify your identity and other personal information.
- Information required to determine your suitability to use the services that we offer.
- Information about what services you use and how you use those services.
- Information about the activities that you undertake in respect of the services that we offer, including transactions and activities on accounts that you have with us.
- Any correspondence between us and you.
- Your marketing preferences.
- IP address and device type and ID.
- Other such information as required to satisfy our legal and regulatory obligations in connection with the services that we offer to you.

If you give us personal information about another person, you warrant and represent to us that you are authorised to provide this information to us and have met all other applicable legal obligations. You further agree to inform that person about how we collect, store, use and disclose the information (as set out in this Policy).

WHAT IS THE LEGAL BASIS FOR THE USE OF PERSONAL DATA?

The legal basis on which we rely to process your personal information include:

- On some occasions, we process your data with your consent (for example, when you agree that we may place cookies or process information that you input into our website).
- On other occasions, we process your data when we need to do this to fulfil a contract with you (for example, for billing purposes) or where we are required to do this by law (for example, to comply with anti-money laundering and government record-keeping obligations).

We also process your data when it is in our legitimate interests to do so and when these interests are not overridden by your data protection rights.

WHAT HAPPENS IF YOU DON'T PROVIDE PERSONAL INFORMATION TO US?

You do not have to provide us with personal information. However, if you choose not to provide the personal information that we ask for, you may not be able to use our services or parts of our website.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information about you from the following sources:

- When you contact us via live chat, phone or email.
- When you ask for information about our services.
- When you access and use our website. We use cookies on our website to collect information about your visit to our website so that we can improve our website. A cookie is a small data file placed on your computer by our server. Most browsers are set up to accept cookies, but these settings can be changed by you at any time.
- When you make an application to use our services.
- When you use our services.
- When you pay funds to us or withdraw funds from your trading account held with us.
- When you participate in surveys, news updates or promotions.
- Publicly available sources.
- Third parties where you have agreed to the release of such personal information to us from those third parties.

HOW WE MAY USE YOUR PERSONAL INFORMATION

We will only use your personal information for the purpose that it was collected for and we will only retain your personal information for so long as is required to fulfil the purpose that it was collected for and to meet our legal and regulatory obligations.

We may use your personal information for the following purposes:

- Verifying any information that we collect about you (whether that be from you or from a third party). This includes, among other things, carrying out identity verification and other checks required to satisfy our obligations under the Anti-Money Laundering and Countering Financing Terrorism Act 2009.

- Assessing your suitability to use our services.
- Providing you with the services that you have requested, providing assistance to you in relation to those services and managing and administering the services provided to you.
- Satisfying any obligation arising from any agreement between you and us.
- Contacting you with information about us, our services and other matters that we think may be of interest to you. You have the right to request that we cancel this service.
- Responding to your queries or any requests that you may have.
- Handling internal and external complaints handling and dispute resolution.
- Monitoring, operating, maintaining and improving our website.
- Complying with our legal and regulatory obligations or in connection with legal proceedings, crime or fraud prevention, detection or prosecution.
- Any specific purpose that we notify you of at the time of collecting your personal information.

You authorize any third party to provide your personal information to us for any of these purposes.

SHARING YOUR PERSONAL INFORMATION

We may share personal information that we hold about you to the following parties and for the following purposes:

- Third parties for the purposes of carrying out identity verification and other checks required to satisfy our obligations under the Anti-Money Laundering and Countering Financing Terrorism Act 2009.
- Third parties and service providers that assist us to deliver, improve and promote our services.
- Third parties in order to meet our legal or regulatory obligations.
- Financial institutions that we engage with in the course of doing business.
- External and professional service providers that provide services to us.
- Regulatory or government bodies with which we are required to engage with in the course of doing business.
- Entities that may acquire an interest in us or acquire part of our business.
- To any person or entity with your express consent.
- For any purpose that is permitted under the Privacy Act 1993 or relevant applicable law.
- Where required by applicable law or any Court, or in response to a request by a law enforcement agency.

Personal information that you provide to us may be transferred, processed, used or stored by us and/or our third-party services providers in countries other than New Zealand.

Where we engage third-party service providers to carry out certain processing activities on our behalf, we will require that appropriate technical and organisational measures are in place to ensure such third party is bound by substantially similar obligations as set out in this Policy and will meet the necessary legal requirements in relation to such processing.

If you have any concerns regarding the transfer or disclosure of your personal information overseas, or if at any time you wish to withdraw your consent to such transfer and/or disclosure, you may do so in accordance with the Your Rights In Relation To Your Personal Information section below. However, please note that if you withdraw your consent, we may not be able to provide some or all of the services you have requested.

We will not sell or rent your personal information to any third party.

APPLICATION OF OVERSEAS PRIVACY LAWS

Our website and services can be accessed by people all over the world, including countries that may have different privacy laws to New Zealand. By visiting our website, accessing our services or otherwise providing us with your personal information, you acknowledge and agree that your personal information may be processed for the purposes set out in this Policy and otherwise in accordance with New Zealand law.

If you are located in a European Union Member State, to the extent that we are subject to the EU General Data Protection Regulation 2016/679 ("GDPR"), we will comply with our obligations under the GDPR in relation to the processing of any personal data that we hold about you.

HOW WE STORE AND PROTECT YOUR PERSONAL INFORMATION

We will take reasonable steps to employ appropriate physical, technical and administrative security measures to help prevent loss, misuse, unauthorised access, disclosure or modification of your personal information.

DURATION OF STORAGE

When we store your personal information, we will do so for as long as necessary to:

- Fulfil the specific purposes for which your personal information was collected;
- Perform the services that we have contracted to provide to you;
- Comply with our legal obligations or enforce our legal rights; or
- Meet our other legitimate purposes as otherwise permitted by the Privacy Act 1993.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

You have the right to review, access and correct your personal information held by us.

In addition, you have the right to request further information about the handling of your personal information. If you wish to do so, or to notify us of a change in your details, you may contact us using the following details:

Address: Black Bull Group Limited, Level 22, 120 Albert Street, Auckland 1010, New Zealand
Email: Support@blackbullmarkets.com

Note that there are exceptions to these rights. For example, access to personal information may be denied in some circumstances if making the information available would reveal personal information about another person or if we are legally prevented from doing so. In addition, we may retain data even if you withdraw your consent where we can demonstrate that we have a legal requirement to process your personal information.

If you have a question about the use of your personal information or wish to file a complaint about our use of it, please contact us using the contact details set out above.

If you have unresolved concerns, you also have the right to complain to the relevant data protection authority.

Where we receive a request from you, we will process it in the time periods set out by applicable law.

COOKIES AND THIRD-PARTY WEBSITES

Our website uses cookies and web server logs to collect information about how you use our website. We may serve third-party advertisements that use cookies and web beacons in the course of ads being served on our website. You have the ability to accept or decline cookies by modifying your web browser.

Please be aware that our website may contain links or references to third-party websites, and our Privacy Policy does not apply to those websites. We are not responsible for the content or information collection practices of those pages and take no responsibility for the privacy practices or security of other websites. We encourage you to review and understand their privacy practices before providing them with any information.

MARKETING COMMUNICATIONS

With your consent, we may send marketing and promotional messages to electronic addresses that you have provided to us. In providing your consent you are warranting and representing to us that you have the authority to provide this consent. You can revoke this consent at any time by contacting us using the details above or by using the functional unsubscribe facility in any electronic communication sent from us or on our behalf.

AMENDMENTS TO THIS PRIVACY POLICY

This Policy is dated October 2020. We keep this Policy under regular review and may change it from time to time in order to reflect changes in the law and/or our privacy practices. The date at the top of this Policy will be updated accordingly.

We encourage you to check the date of this Policy for any updates or changes when you visit our website or use our services. We will notify you of any modified versions of this Policy that might materially affect the way we use or disclose your personal information.

We will ensure that the current version of our Policy is available at all times on our website: <https://blackbullmarkets.com>.