

# Privacy and Security Policy

This Privacy Statement describes how Verbo Capital PTY LTD collects, maintains, uses, and discloses your personal data. It also provides some details about the rights associated with customers' personal data.

## Personal Data

To obtain information about Verbo Capital PTY LTD products and services, to access and use this and other Verbo Capital PTY LTD websites, and/or to apply for an account on Verbo Capital PTY LTD, please provide your personal data to Verbo Capital PTY LTD. Verbo Capital PTY LTD may also collect data about you from a public channel (e.g., company register) when evaluating an application.

If you provide us with others' personal data, you represent that you are authorized to do so and agree to inform that person of our identity, that we will use and disclose the data for the relevant purposes set forth below, and such person may access to their personal data held by us.

Verbo Capital PTY LTD will keep records of all transactions and activities on your account with us, including details of trading contracts and margin call notices. During the establishment of your relationship with Verbo Capital PTY LTD, our company will also collect information about the products and services that we provide to you.

Our company legally collects information that allows us to identify and verify your identity. Your personal data will be handled in strict accordance with the privacy principles of the Privacy Act of 1993.

## Phone Calls

Verbo Capital PTY LTD may record calls between you and staff of Verbo Capital PTY LTD. These records or transcripts may be used to resolve any dispute between you and Verbo Capital PTY LTD.

## Website of Verbo Capital PTY LTD

Our company collects statistical data about visitors to our website, such as the number of visitors, pages viewed, types of transactions, online time, and files downloaded. This information may be used to evaluate and improve the performance of our website. Other than statistical data, we will not collect any data about you through our website unless you provide us with such data.

Please also note that our Website uses cookies, which are small amounts of data that typically consist of a unique identification number or value sent from a website's computer to the customer's browser and stored on the customer's computer's hard drive. Each website can send its cookies to your browser if your browser allows it. However, in order to protect your privacy, your browser will only allow the website to access the cookies it sends to your computer.

In addition to facilitating your access to your own online account, cookies are also used to collect the statistical data described above when you use cookies on the website. When accessing an online account, the system creates cookies that uniquely identify the customer's computer and their user name and password, which means that you do not have to re-enter this data each time you access your online account.

Most Internet browsers are set up to accept cookies. But if you do not want to receive cookies, you can choose whether to accept or not by changing your browser Settings to reject all cookies or by setting the computer to be notified every time a Cookie is sent. If you reject all cookies, you will not be able to access your online account. You can also delete cookies from your computer after they have been created.

## Use of data by Verbo Capital PTY LTD

Customers are required to fill out the required data on the account opening application in order for us to provide you with our services. The above data as well as the data collected and maintained by Verbo Capital PTY LTD during the establishment of the relationship between the parties will be used to manage and control the products and services offered to you and to provide you with up-to-date information on a variety of matters, including trading contracts, margin obligations, account funding, and other activities of Verbo Capital PTY LTD.

We may also use your personal data to get to know about products and services of Verbo Capital PTY LTD that may that you may be interested in and to market such products and services to you.

Verbo Capital PTY LTD may also disclose your personal data to:

- Financial institutions and other similar organizations that have dealings with Verbo Capital PTY LTD in in the activities of the Company, or which you specify;
- External service providers and professional consultants providing services to our company (which may be located overseas) ; and
- The organization or person you request to act on your behalf, including your financial advisor, broker, attorney, or accountant.
- Verbo Capital PTY LTD Corporation and its affiliates.

Verbo Capital PTY LTD is solely responsible for protecting your personal data from misusing, losing, unauthorized accessing, modification or disclosing.

## What rights do you have

You are not required to provide any of the personal data requested by Verbo Capital PTY LTD. However, without such data, Verbo Capital PTY LTD will not be able to open an account for you or provide you with any other services, information, or assistance that you have requested if such data is required for the application.

If you have any questions or complaints about your privacy, please do not hesitate to contact us. If you are not satisfied with Verbo Capital PTY LTD handling of your complaint, you may file a complaint with the Privacy Officer.

## Customer Access Data

Customers may obtain data of some customer held by Verbo Capital PTY LTD by sending an email to [support@iverbo.net](mailto:support@iverbo.net). We will normally process your request within 14 days. If the request is more complex and requires more time, we will notify you of the additional time required.

Requests for accessing to data are free of charge, but Verbo Capital PTY LTD will charge you a reasonable fee for processing the request.

In some cases, Verbo Capital PTY LTD may legally deny you accessing to such data. In such cases, we will inform you of the reasons for denying access.

## Correction of Data

Please notify us promptly of any changes to the personal data held by Verbo Capital PTY LTD to ensure that your personal data is up-to-date and so that we can keep you informed of your account status, margin obligations, and trading activities.

You may request us to correct any personal data held by Verbo Capital PTY LTD which you believe to be inaccurate at any time. If we disagree with you about the accuracy of the data, you may request us to attach a statement with your opinion on what is inaccurate or incomplete.

## Receiving Commercial Emails

By accessing this website, you consent to our sending commercial emails (including emails about our products and services) to any email address that you provide or for which you are responsible. You guarantee that you have the authority to act as or on

behalf of the e-account holder, to consent to the foregoing and that we may continue to send commercial email to such address until you provide us with written notice or use the unsubscribe function in the email to revoke such consent.

## **Your Consent**

By accessing this website, you consent that Verbo Capital PTY LTD collects, maintains, uses and discloses personal data provided by you or others mentioned above.

## **Revisions to Privacy Statement**

Verbo Capital PTY LTD may change this Privacy Statement from time to time for any reason. The date of this Privacy Statement is August 20, 2018.