



MiTRADE

Trade Faster Trade Smarter

PRIVACY POLICY

MITRADE GLOBAL PTY LTD
NOVEMBER 2025

LEVEL 11, 350 COLLINS STREET
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CFDS ARE LEVERAGED PRODUCTS THAT CAN CARRY A HIGH LEVEL OF RISK AND MAY RESULT IN THE LOSS OF YOUR ENTIRE INVESTMENT. TRADING CFDS IS NOT SUITABLE FOR EVERYONE. BEFORE ENGAGING IN OUR PRODUCTS AND SERVICES, PLEASE REVIEW OUR DISCLOSURE DOCUMENTS, INCLUDING THE FINANCIAL SERVICES GUIDE, PRODUCT DISCLOSURE STATEMENT, RISK DISCLOSURE STATEMENT AND CLIENT AGREEMENT, TO ENSURE YOU FULLY UNDERSTAND THE RISKS INVOLVED.

ABN 90 149 011 361 | AFSL NO. 398528

1. INTRODUCTION

Mitrade Global Pty Ltd (“we”, “us”, “our”, “Mitrade”) is committed to protecting your privacy and the confidentiality of your personal information.

We comply with the Privacy Act 1988 (Cth) (“**Privacy Act**”), including the Australian Privacy Principles (“**APPs**”), and any other applicable privacy or data protection laws in Australia.

This Privacy Policy outlines how we collect, use, store, disclose, and protect your personal information when you use our products and services, including Contracts for Difference (“**CFDs**”) and other financial services we provide.

By accessing our website, applying for or using our services, or otherwise providing us with personal information, you agree to this Privacy Policy.

2. Personal Information

Personal information is 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.

Sensitive information includes things like 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 sensitive information. Sensitive information is also personal information for the purposes of the Privacy Act.

3. What Personal Information We Collect

We collect personal information that is reasonably necessary to provide our financial products and services, meet our legal obligations, and maintain our relationship with you.

3.1 Types of personal information

We may collect the following types of information:

- **Identification information:** Full name, date of birth, gender, nationality, residential address, and contact details.
- **Verification documents:** Passport, driver’s licence, utility bills, or other documents required under AML/CTF laws.
- **Financial information:** Employment details, income, assets, liabilities, tax file number (TFN) (optional), bank account details, and trading history.
- **Trading and transaction information:** Account numbers, trading activity, order history, and communication records.
- **Digital information:** IP address, device identifiers, browser type, operating system, and website usage data via cookies and analytics tools.
- **Other information:** Any other details you provide during account opening, correspondence, or when participating in surveys, promotions, or training.

We do not currently collect sensitive information from you. However, if we do so, we will not collect sensitive information from you without first obtaining your consent. Provided with your consent, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected. Sensitive information may also be used or disclosed if required or authorised by law.

4. How We Collect Personal Information

We may collect personal information:

- Directly from you through application forms, online registration, telephone conversations or correspondence.
- From your interactions with our website, platforms, or mobile apps.
- From third parties such as credit reporting agencies, identity verification providers, payment service providers, or regulatory bodies.
- From publicly available sources or data aggregators, where lawful.

We will only collect your personal information by lawful and fair means.

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.

In most cases, we'll obtain your consent to use and disclose your personal information for our intended purposes either before or at the time that we collect it. If you don't give us your consent or withdraw your consent, we may not be able to provide you with the products or services you ask for.

We will always ensure you are informed of our purpose in collecting information, and your right to gain access to such information.

5. Why We Collect and Use Personal Information

We only collect personal information when it's reasonably necessary for us to provide our financial product and services to you. We collect this information only with your consent and for the primary purpose disclosed to you at the time of collection.

We collect, hold, and use your personal information for the following purposes:

- To verify your identity and comply with Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) obligations.
- To process applications for opening or maintaining CFD trading accounts.
- To execute and administer your trades and transactions.
- To provide you with customer support, account management, and related services.
- To improve our website, platforms, and services.
- To comply with regulatory requirements and report to authorities such as ASIC, AUSTRAC, and the ATO.
- To manage our internal risk, compliance, and fraud prevention processes.
- To send you marketing communications (where permitted) about products, services, or promotions that may be of interest to you.

You may opt out of receiving marketing communications at any time by following the unsubscribe link or contacting us directly.

6. Disclosure of Personal Information

We may disclose your personal information to:

- Our related entities, employees, and authorised representatives.
- Financial institutions and other similar organisations that it deals with in the course of its corporate activities, including your financial services providers, or those that are nominated by you.

- Any organisation at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor, accountant, or any person appointed by you to act as your agent.
- Third-party service providers such as those providing IT, payment processing, cloud hosting, KYC/AML verification, auditing, marketing, and analytics services.
- Regulatory, government, or law enforcement agencies, including ASIC, AUSTRAC, and the ATO, where required or authorised by law.
- Professional advisers such as lawyers, auditors, and consultants.
- Counterparties, liquidity providers, and execution venues where necessary to carry out your instructions.
- Overseas entities where our service providers or data storage facilities are located.

Please note that Mitrade does not sell your personal information to third parties for marketing purposes.

Mitrade takes all reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

7. Storage and Security of Personal Information

We are committed to safeguarding the personal information we hold about you from misuse, interference, loss, unauthorised access, modification, and disclosure. To achieve this, we maintain a comprehensive framework of physical, electronic, and procedural safeguards designed to ensure a robust and secure environment. These measures are reviewed regularly to ensure their continued effectiveness.

Our security measures include:

- Encryption of sensitive data and secure transmission protocols (e.g. SSL/TLS).
- Strong password protection and complexity requirements, with routine password changes.
- Two-factor authentication for all remote system access.
- Restricted access to authorised personnel only, based on role and relevance to their duties.
- Automatic logging and review of all unauthorised access attempts.
- Regular system monitoring, vulnerability assessments, and security audits.
- Data ownership clearly defined, and access rights updated when employees change roles.
- Continuous employee education on data protection and privacy obligations.
- Use of firewalls, intrusion detection systems, and antivirus software to prevent unauthorised access.
- Secure storage and physical protection of computers and servers containing personal information.
- Limited print reporting of personal data and enforcement of a “clean desk” policy.
- Encryption of data transmitted over networks and when outsourcing data processing.
- Secure storage and disposal of physical records.
- Physical and electronic access controls for offices and data centres (e.g. swipe cards, alarms, cameras).

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected and to comply with applicable legal, regulatory, and business requirements. When personal information is no longer required, we take reasonable steps to securely destroy or permanently de-identify it.

8. Direct marketing

Unless you've asked us not to, we may use your personal information to let you know about new or improved products and services and special offers that may be of interest to you. If you don't want us to use your personal information for marketing purposes, please contact us using one of the following channels:

- Post: Level 11, 350 Collins Street, Melbourne, Victoria, 3000, Australia
- Phone: +61 3 9606 0033
- Email: cs.au@mitrade.com

9. Cross border disclosure of personal information

We may disclose or transfer your personal information to related companies or trusted third-party service providers located outside of Australia. These disclosures are made for purposes such as providing our services, verifying your identity, maintaining our systems, and supporting our business operations. All external parties engaged by Mitrade are required to handle personal information in accordance with strict confidentiality obligations and to comply with the Australian Privacy Principles (APPs) or equivalent privacy standards.

Some of our related entities and third-party service providers may be located in or have operations in Cyprus, Mauritius, Cayman Islands, Singapore, Hong Kong, China, the United Kingdom, South Africa, and other countries.

By providing your personal information to us, you acknowledge and agree that your personal information may be transmitted, stored, or processed in a country that may not offer the same level of data protection as Australia.

9.1 Safeguards and Legal Basis for Disclosure

We will not disclose your personal information to an overseas recipient unless one of the following applies:

- We have taken reasonable steps to ensure that the recipient does not breach the Privacy Act 1988 (Cth) or the APPs in relation to your personal information;
- The recipient is subject to a law or binding scheme that provides substantially similar protection to the APPs, and you are able to enforce those protections;
- You have expressly consented to the disclosure after being informed that if the overseas recipient breaches the APPs, Mitrade may not be accountable for that breach under the Privacy Act and you may not be able to seek redress under that Act;
- The disclosure is required or authorised by law or by a court or tribunal order; or
- A permitted general situation (as defined in subsection 16A(1) of the Privacy Act) exists in relation to the disclosure.

9.2 Protection of Your Personal Information

Before disclosing any personal information overseas, we take reasonable contractual and practical steps to ensure that:

- The overseas recipient handles your personal information in a manner consistent with this Privacy Policy and the APPs; and
- Your personal information remains protected against unauthorised access, loss, or misuse.

Where you have provided your consent to an overseas disclosure, you acknowledge that Mitrade may not be able to ensure that the overseas recipient complies with the APPs. In such cases, Mitrade will not be accountable under the *Privacy Act 1988 (Cth)* for any breach of the APPs by that overseas recipient.

10. Access and Correction

You have the right to request access to the personal information we hold about you, and to request that we correct any personal information that is inaccurate, out of date, incomplete, irrelevant or misleading, in accordance with the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles (APPs)*.

10.1 How to Request Access or Correction

Requests for access or correction can be made in writing to our Privacy Officer using the contact details provided in Section 15 Contact Us. To protect your privacy and the security of your information, we may require you to verify your identity and specify the personal information you wish to access or correct.

We will respond to your request within a reasonable time — generally within 30 days — and will not charge you a fee for making the request. However, we may charge a reasonable fee to cover administrative costs associated with providing access to your information.

10.2 Correction of Personal Information

If you believe that any personal information we hold about you is inaccurate, incomplete, or out of date, please contact us. We will take reasonable steps to correct the information as soon as practicable.

If we decide not to make the correction you have requested, we will notify you in writing of:

- The reasons for our refusal (unless it would be unreasonable to do so); and
- How you may make a complaint if you are not satisfied with our decision.

You may also request that we attach a statement to your record noting your view that the information is inaccurate, incomplete, or out of date.

10.3 Deletion of Personal Information

In certain circumstances, you may request that we delete your personal information. Please note that if we delete your information, this may result in the automatic closure of your account.

However, we may need to retain certain personal information to comply with our legal, regulatory, and record-keeping obligations, including financial services and anti-money laundering laws, which generally require us to keep client records for a minimum of seven years after an account is closed.

10.4 When Access May Be Refused

In some circumstances we might have to deny your request for access correction, or erasure, or limit the access we provide. In either of these situations, we'll let you know the reasons for our decision in writing. If you disagree with our decision, you can make a complaint following the process set out in section 14 of this Policy.

11. Do Not Call Register

We may contact you by telephone while you hold any product or receive any services from us. If you do not want to be contacted by telephone about our products or services and not to disclose your information to others for that purpose, you must request this by calling +61 3 9606 0033, for registration of your telephone number on our Do Not Call Register.

12. Cookies and Website Tracking

We collect statistical information about visitors to our websites such as the number of visitors, pages viewed, types of transactions conducted, time online and documents downloaded. This information is used to evaluate and improve the performance of our websites. Other than statistical information, we do not collect any information about you through our website unless you provide the information to us. We do not attempt to identify individual users from this information.

Our website may contain links to other websites. We do not have any control over those websites, and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy. You will need to contact them to ascertain their privacy standards.

You should also be aware that we use cookies on our websites. Cookies are small text files placed on your device and are commonly used on the internet. We use cookies and similar technologies on the Website and the Platform to enhance your online experience and collect information about how our website is used.

We may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see Google's privacy policy or any other policies Google may use from time to time. 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 you can modify your browser settings to reject cookies, but this may affect website functionality.

13. Marketing Communications

We may use your contact details to send you information about our products, services, or promotions.

You can opt out of receiving these communications at any time by clicking "unsubscribe" in our emails or contacting us directly using the contact details provided in Section 15.

14. Complaints and Privacy Concerns

We have an effective complaint handling process in place to manage your concerns. If you have any questions about this Privacy Policy or have a complaint, please contact our Privacy Officer using the details provided under the "Contact Us" heading below or using the contact details located on our website.

To assist us in helping you, please ensure you provide detailed information of your concern and any support documents relating to your complaint for our assessment. We'll investigate your complaint and try to resolve your complaint within 30 days of hearing from you. If your complaint takes longer to resolve, we'll keep you informed of our progress. You can refer to our Complaints Policy on our website for more information.

If you're not satisfied with our handling or resolution of your complaint, there are other bodies you can contact.

The Australian Financial Complaints Authority ("AFCA") can consider most privacy complaints involving providers of financial services. AFCA can be contacted at:

- Postal address: GPO Box 3, Melbourne, VIC, 3001
- Phone: 1800 931 678
- Email: info@afca.org.au
- Website: www.afca.org.au

If you are not satisfied with our response or believe we are not handling your personal information in accordance with the law, you may refer the matter to the Office of the Australian Information Commissioner (OAIC):

- Postal address: GPO Box 5218, Sydney New South Wales 2001
- Phone: 1300 363 992
- Email: enquiries@oaic.gov.au
- Website: www.oaic.gov.au

15. Contact Us

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

- Post: Level 11, 350 Collins Street, Melbourne, VIC 3000
- Phone: +61 3 9606 0033
- Email: compliance.au@mitrade.com

16. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in law, regulation, or business operations. Any updated version will be posted on our website and take effect upon publication.



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