



# PRIVACY POLICY

Update Date: 17<sup>th</sup> January, 2020

PRIVACY  
POLICY

## PURPOSE

Our Privacy policy outlines the use, collection and disclosure of personal information collected on individuals/corporations when Royal's products and services are purchase and or considered. The policy applies at the time of initiation of client relationship with Royal.

Where in this policy the terminology used refers to "we", "us", "our" it shall refer to Royal Financial Trading Pty Ltd and where the terminology used refers to "you", "the client", "your" it shall refer to the individual to whom this policy pertains to, or any natural or legal person in a client relationship with the company and who has used or is actively using our products and services.

This privacy statement and/or policy provides an overview of how we collect, process, protect and use your personal data, and informs you about your rights under the Privacy Act 1988 (Cth) ("Privacy Act").

This privacy policy is available for free on our website and any updates to this privacy policy will be uploaded as necessary onto the website. Check the date of each privacy policy to ensure that you are accessing the most recent edition.

## COLLECTION OF PERSONAL INFORMATION

We collect personal information from you in relation to your use of our products and services. It is important to understand why and how we collect and use this information. We may gather data from you such as your:

- Name;
- Age;
- Physical location;
- Telephone Number;
- Email Address;
- And other related information as reasonably necessary or directly related to services and products provided by us.

We collect your personal information to better provide quality services to you and to comply with any and all legal and regulatory requirements. Other purposes for which we collect personal information include:

- To verify of client identity to prevent identity theft and comply with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) ("AML/CTF Act");
- To contact or notify you as necessary;
- For dispute and risk management purposes;
- For informational and financial security purposes; and
- To assist the activities of the relevant regulatory and enforcement agencies (e.g. ASIC, AUSTRAC etc.).

Royal will never collect sensitive information about an individual without prior written consent, or where the law or a court/tribunal order requires or authorises us to do so. We will endeavour to collect your personal information from you directly, but where it is unreasonable or impractical to do so we will notify you as soon as practicable if your personal information has been collected from a source other than yourself.

In the event that we do collect your personal information, we will notify you as soon as reasonably practicable, or otherwise ensure that you are aware of our collection of your personal information.

## ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

### Your right to access to Personal Information

Pursuant to our obligations under the Privacy Act, we will endeavour to ensure that the information we collect, hold and use is relevant and up to date. Should you wish to access your personal information held by us, you may request that we provide you with this personal information by emailing [hello@oneroyal.com](mailto:hello@oneroyal.com) and we will strive to accommodate you by responding to your request within a reasonable period of time after the response is made. We may choose to charge you a small sum for accessing your information.

However, we can choose not to give you access to personal information if doing so would pose a serious risk of injury or safety, or would prejudice the privacy of other individuals, or if giving access is unlawful or forbidden by court/tribunal order, or if doing so might adversely or materially affect any proceedings or disputes between you and us. However, we may still provide you with some of this information to the extent that it does not impact upon the aforementioned reasons. If we refuse to give you access or full access, we will provide you with a written notice detailing why we have rejected your request and any mechanisms available to you to complain about our decision (see "MAKING A COMPLAINT" below).

### Your right to correct personal information

Should you wish to correct your personal information, simply email us at [hello@oneroyal.com](mailto:hello@oneroyal.com) and we will update it accordingly. We will respond to any request to correct information within a reasonable period of time after your request is received. Similarly, if we refuse to fully amend your information, we will provide you with a written notice detailing why we have rejected your request and any mechanisms available to you to complain about our decision (see "MAKING A COMPLAINT" below).

## USE AND DISCLOSURE OF PERSONAL INFORMATION

We will not use or disclose your personal information for any purpose it was not collected for, unless you have consented to that disclosure, we are required to do so by law or a court/tribunal order or if the use/disclosure is reasonably necessary or expected.

As per this policy, Royal may disclose your personal information to additional parties. We may choose to disclose your personal information to the below parties in connection with us providing you our products and services:

- Individuals or companies in the employ of Royal whether staff or contracted, either in Australia or overseas;
- Authorised agents of Royal;
- Financially related institutions and other comparable entities regarding our corporate activities or that are named by you;
- Organisations which you request us to or any persons acting on your behalf, which may include your financial adviser, broker, solicitor or accountant;
- Other entities to whom disclosure is reasonably necessary to facilitate the use of our services.

We may disclose information to third parties provided to us by you in order to substantiate your identity(ies) and other personal details, in accordance with our AML/CTF Act obligations. Your personal information can also be disclosed by us to facilitate the activities of relevant enforcement agencies such as ASIC or AUSTRAC.

Certain products and services issued by Royal may link our clients to third party websites. Royal does not control these websites and therefore the information and privacy rules may differ from our policy. Clients should review the information and privacy policy of the third party before submitting information or consenting to the use of that information by the third party. Similarly, where your personal information has been disclosed to overseas recipients, we are legally bound to take reasonable steps to ensure that these recipients do not breach the principles contained within the Privacy Act unless you consent otherwise or the recipient in question is located in a country with a similar scheme to the Privacy Act.

We may use your personal, non-sensitive information collected from you for, to the extent permissible by the relevant laws and regulations, the purpose of informing you about products and services that may be relevant or useful to you. However, you can request that we refrain from doing so by emailing [hello@oneroyal.com](mailto:hello@oneroyal.com) and letting us know.

Royal records incoming and outgoing calls between you and Royal representatives. These recordings or transcripts may be used as evidence in the event of a dispute between you and Royal, or otherwise for training purposes.

## HOW WE KEEP YOUR INFORMATION SECURE

We are committed to the protection of your privacy and adhere closely to the Australian Privacy Principles contained in Schedule 1 of the Privacy Act. Your privacy is important to Royal and as such we take plausible steps to protect your personal information from misuse, interference by unauthorised persons, loss, unauthorised access, erroneous modification and unauthorised disclosure.

If we hold personal information that we no longer need (for use, disclosure, to meet legal/regulatory requirements etc.) then we will take reasonable steps to destroy or de-identify said information.

## OUR COOKIE POLICY

Royal Financial Trading may use "cookies". Cookies are text files placed on your hard drive by your web browser for operational and record keeping purposes. These cookies sometimes track information about you. You may choose to disable cookies in your web browser or alerts when cookies are sent; however, doing so may cause web pages to function incorrectly.

Royal uses the information from cookies to improve our website's accessibility and relevance, generate promotions, contests, surveys and like according to the interests of our users.

## MAKING A COMPLAINT

It is Royal policy that all complaints undergo an internal review process before resolution or escalation. Royal aims to provide a resolution to all complaints within 14 days from the date of complaint. If you are dissatisfied with the process or conclusion you are welcome to contact Royal to discuss the outcome.

If you are still unsatisfied, you can make a complaint to the Office of the Australian Information Commissioner ("OAIC"), the government agency responsible for privacy and security. The details of the OAIC are:

Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney, NSW 2001  
Telephone: 1300 363 992  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

## CONTACT US

Level 7, 1 York Street, Sydney NSW 2000