

ZERO Markets Australia Pty Ltd

trading as Zero Markets

Privacy Policy and Collection Statement

Last updated: July 2026



1. INTRODUCTION

Zero Markets Australia Pty Ltd, trading as Zero Markets ("**Zero Markets**", "**we**", "**our**", "**us**") is bound by the *Privacy Act 1988* ("the **Privacy Act**"), including the Australian Privacy Principles ("**APPs**"), and recognises the importance of ensuring the confidentiality and security of your personal information.

All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by Zero Markets must abide by this Privacy Policy and Collection Statement ("**Privacy Policy**"). Zero Markets makes this Privacy Policy available free of charge and can be downloaded from its website.

In this Privacy Policy:

- 'Disclosing' information means providing information to persons outside of Zero Markets.
- 'Personal information' means information or an opinion relating to an individual, which can be used to identify that individual (including an uploaded image of the individual).
- 'Privacy Officer' means the contact person within Zero Markets for questions or complaints regarding Zero Markets' handling of personal information.
- 'Sensitive information' is personal information that includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, and also includes health information.
- 'Use' of information means use of information within Zero Markets.

2. COLLECTION STATEMENT

Zero Markets is committed to ensuring the confidentiality and security of your personal information. This section sets out the key information required to be provided to you at or before the time we collect your personal information.

a. The entity collecting the information

The entity that collects information is Zero Markets Australia Pty Ltd. If you have any questions about privacy issues or enquiries, please contact us by any of the following ways:

Atten: Support Team of Zero Markets Australia Pty Ltd	
Telephone:	+61 2 7908 3133

Email:	support@zeromarkets.com.au
Writing:	Suite 702 , Level 7, 7 Macquarie Place, Sydney NSW 2000

b. Circumstances of collection

We collect information about you from website enquiry, email, application form, telephone enquiry, live chat, mobile applications, trading platforms, social media and referral partners, as well as through your ongoing use of our products and services.

c. Purposes of collection

Zero Markets collects and holds personal information for the purposes set out in this Privacy Policy, including to provide you with our products and services, to verify your identity, and to comply with our legal and regulatory obligations.

d. Consequences of not providing information

If you do not provide some or all of the personal information requested by us, we may be unable to provide you with our products or services.

3. WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We may collect and hold a range of personal information about you to provide you with our services, including:

- name, address, phone numbers (home, mobile and work), date of birth, postal or email address;
- information relating to an individual's income and source of wealth, and occupation;
- credit/debit card details and bank account details, including institution name, branch, account name, and account number;
- information relating to your trading experience and investment objectives;
- identification documentation as required under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* and the corresponding regulations, including passport, driver's licence, national identity card, and utility bills;
- records of correspondence such as phone conversations, emails and other digital communications;



- online activity including IP address, browser type, time zone setting, and information about your visit to our website;
- biometric information used for identity verification and fraud prevention, collected only with your consent except where permitted by law;
- gender;
- investigation information including financial crime screening, fraud checks, global sanction checks and politically exposed persons (PEP) screening; and
- any other information that is relevant to the services that we provide.

4. HOW DO WE COLLECT PERSONAL INFORMATION?

We generally collect personal information directly from you through our application processes, forms and other interactions with you in the course of providing our products and services, including when you visit our website, use a mobile app, call us or send us correspondence.

We may also collect personal information about you from a third party, such as electronic verification services, referrers and marketing agencies. Third-party sources may include our related companies; brokers or referrers; identity and electronic verification services; government and law enforcement agencies; and publicly available sources such as government registers and the internet. When we collect personal information from third parties, we will take reasonable steps to ensure that you are made aware of this Privacy Policy.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services or meet your needs appropriately.

We do not give you the option of dealing with us anonymously or under a pseudonym, as it is impractical and, in some circumstances, illegal for Zero Markets to deal with individuals who are not identified.

5. UNSOLICITED PERSONAL INFORMATION

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purposes for collecting personal information. If we retain such information, we will hold it in the same way we hold your other personal information.

6. WHO DO WE COLLECT PERSONAL INFORMATION ABOUT?

The personal information we may collect, and hold includes (but is not limited to) personal information about:

- clients and potential clients;
- client's agents, company directors and officers, trustees, partners, and beneficial owners;
- service providers or suppliers;
- prospective employees, employees and contractors; and
- other third parties with whom we come into contact.

7. WEBSITE AND USE OF COOKIES

We collect personal information when we receive completed online forms from our website. We may also use third parties to analyse traffic on our website, which may involve the use of cookies. Information collected through such analysis is anonymous.

We use essential cookies to operate our website. We may also use optional analytics and marketing cookies, which require your separate consent. You can manage cookie preferences through your browser settings at any time. You can withdraw or modify your consent at any time through your browser settings. Please note that if you set your browser to refuse cookies, some features of our website may not be available.

Cookies are small text files transferred to your computer's hard drive through your web browser that enable our website to recognise your browser and capture certain information. Cookies do not contain personal information in themselves but can be used to identify a person when combined with other information.

We use cookies to understand how users interact with our website and to compile aggregate data about website traffic. We will delete all data obtained through cookies every 30 days.

We may share website usage information with advertising companies using pixel tags (web beacons) for targeting purposes. Information collected through these tags is not personally identifiable.

8. WHY DO WE COLLECT AND HOLD PERSONAL INFORMATION?

We may use and disclose the information we collect about you for the following purposes:

- provide you with our products and services and review and meet your ongoing needs;
- consider and assess your request for a product or service;



- verify your identity and carry out due diligence and AML/CTF checks;
- provide you with information about products or services that may be of interest to you, or invite you to events;
- assess whether you qualify as a wholesale client, retail client, or other designated category under the Corporations Act 2001;
- consider any concerns or complaints you may have;
- protect our business and other customers from fraudulent or unlawful activity;
- conduct our business and perform management and administration tasks;
- manage any legal actions involving Zero Markets;
- comply with relevant laws, regulations and other legal obligations; and
- help us improve the products and services offered to our customers and enhance our overall business.

We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

9. WHO MIGHT WE DISCLOSE PERSONAL INFORMATION TO?

We may disclose personal information to:

- a related entity of Zero Markets;
- an agent, contractor or internal and external service provider we engage to carry out our functions and activities, such as our lawyers, accountants, debt collectors, electronic identity verification service providers, or other advisors;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing our payments, including payment merchants and other financial institutions such as banks;
- liquidity providers and financial product issuers who facilitate our services;
- regulatory bodies, government agencies, law enforcement bodies and courts; and

- anyone else to whom you authorise us to disclose it or as required by law.

We will only disclose your personal information to third parties for the purposes set out in this Privacy Policy, to the extent necessary, and in accordance with applicable laws. Where we engage third-party service providers, we will take reasonable steps to ensure they handle your personal information in a manner consistent with the APPs.

10. SENDING INFORMATION OVERSEAS

We may disclose personal information to recipients located outside Australia in some circumstances, including to Tax Offices, Police Stations, and other AML/CTF regulatory authorities. These recipients may be located in the following regions:

- China
- Hong Kong
- United Kingdom
- United States
- European Union countries

We will not send personal information to recipients outside of Australia unless we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act or the APPs; the recipient is subject to a similar privacy scheme; or the individual has consented to the disclosure.

11. MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

We recognise the importance of securing the personal information of our customers. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure.

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. We apply the following security measures:

- passwords are required to access our systems and are routinely reviewed;
- employees have restricted access to personal information relevant to their duties;
- the system automatically logs and reviews all unauthorised access attempts;
- all computers containing personal information are secured both physically and electronically;
- data is encrypted during transmission; and



- print reporting of data containing personal information is limited.

In the event of an eligible data breach, Zero Markets will comply with its obligations under the Notifiable Data Breaches scheme (Part IIIC of the Privacy Act), including notifying affected individuals and the OAIC as required.

12. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We retain your personal information for as long as you are a client of Zero Markets and for a period of time thereafter. The period for which we retain your information will depend on the type of information, our contractual obligations, legitimate business needs, and any applicable law or regulation requiring us to keep information for certain minimum periods.

As an Australian Financial Services Licence holder, we are generally required to retain certain records for a minimum of 7 years under the Corporations Act 2001. We may keep your data for longer than 7 years if we cannot delete it for legal or regulatory reasons.

When we no longer require your personal information for a permitted purpose under the APPs, we will take reasonable steps to securely destroy or permanently de-identify it.

13. DIRECT MARKETING

We may use your personal information to send you marketing material from time to time, unless you elect not to receive such material. In relation to sensitive information, we may only use or disclose it for direct marketing purposes if you have consented.

You have the right to opt out of receiving marketing communications from us at any time by sending "Unsubscribe" to support@zeromarkets.com.au. We will give effect to any opt-out request within a reasonable period of time.

You may also request that Zero Markets provides you with the source of your information. If such a request is made, we will notify you free of charge within a reasonable period of time.

14. IDENTIFIERS

We will not use identifiers assigned by the Government, such as a tax file number or Medicare number, for our own file recording purposes, unless one of the exemptions in the Privacy Act applies. Zero Markets endeavours to avoid data-matching as a basis for further investigation or action in relation to individuals.

15. HOW DO WE KEEP PERSONAL INFORMATION ACCURATE AND UP-TO-DATE?



Zero Markets is committed to ensuring that the personal information it collects, uses and discloses is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information we hold about you. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge individuals for correcting the information.

16. ACCESSING YOUR PERSONAL INFORMATION

Subject to the exceptions set out in the Privacy Act, you may gain access to the personal information that we hold about you by contacting the Zero Markets Privacy Officer. We will provide access within 30 days of your request. If we refuse to provide the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required. We do not charge for making an access request. However, we may charge a reasonable fee to cover the cost of retrieving and providing access, such as search and photocopying costs.

17. YOUR RIGHTS

This Privacy Policy contains information about how:

- you may access the personal information we hold about you;
- you may seek the correction of your personal information;
- you may ask us to provide an alternative means of identity verification for the purposes of the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth);
- you may complain about a breach of the Privacy Act, including the APPs; and
- we will deal with a privacy complaint.

18. UPDATES TO THIS PRIVACY POLICY

This Privacy Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment. We will notify you of material changes by posting an updated version on our website and, where appropriate, notifying you by email. Continued use of our services following notification constitutes acceptance of the updated Policy.

19. INCIDENTS / COMPLAINTS HANDLING

Zero Markets has an effective complaint handling process in place to manage privacy risks and issues. You can make a complaint to Zero Markets about the treatment or handling of your personal information by lodging a complaint with the Privacy Officer.



If you have any questions about this Privacy Policy or wish to make a complaint about how we have handled your personal information, you can contact us via the contact details set out Section 2(a).

20. WHAT IF YOU ARE NOT SATISFIED WITH THE RESPONSE?

If you are not satisfied with the result of your complaint to Zero Markets, you can refer your complaint to the Office of the Australian Information Commissioner ("**OAIC**"):

- By telephone: 1300 363 992
- By writing: Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001
- By email: enquiries@oaic.gov.au
- Website: www.oaic.gov.au

Alternatively, you can contact the Australian Financial Complaints Authority ("**AFCA**") if you are a retail client, which provides free and independent external dispute resolution for financial complaints:

- By telephone: 1800 931 678
- By post: GPO Box 3, Melbourne VIC 3001
- By email: info@afca.org.au
- Website: www.afca.org.au