

# Privacy Policy (NZ)

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**Black Bull Group Limited (BlackBull Markets)**

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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 Black Bull Group Limited and its related companies (including BBG Limited). 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.

We may also collect, use and disclose personal information where this is necessary to provide our services, comply with our legal and regulatory obligations, or where otherwise permitted under the Privacy Act 2020. This includes processing required to meet anti-money laundering and counter-terrorism financing obligations, manage risk, prevent fraud, and operate our business.

## 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 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 directly from you:

- 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.
- 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.

We also collect personal information about you from publicly available sources and other third parties where you have agreed to us collecting that personal information or where such collection is otherwise permitted by law. This includes the collection of:

- Identity and verification information, including your name, address, date of birth, passport and driver licence details, credit history, political exposure and sanctions data, collected from third-party identity verification providers (such as Cloudcheck, Refinitiv and the like), the New Zealand Transport Agency (Waka Kotahi Land Transport), and the Department of Internal Affairs, for the purpose of verifying your identity and complying with our obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009;
- Account, transaction and trading data, including balances, orders, executions and trading activity, collected from trading platforms, liquidity providers, payment systems, and other third-party service providers that form part of, or support, the trading, payment and settlement infrastructure used to provide our services, together with any personal information shared with such providers in the course of delivering those services, for the purpose of facilitating, executing and monitoring your trading activities, processing payments, managing risk, and complying with our legal and regulatory obligations, including under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009.

If we collect any other personal information about you from a source other than yourself, we will take reasonable steps to ensure you are aware of the collection, the purpose for which the information is collected, the intended recipients, the name and contact details of the agency that collected and holds the information, whether the collection is authorised or required by law, and your rights of access and correction, unless an exception under the Privacy Act 2020 applies.

## 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 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.

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, updates, or other matters that may be of interest to you, subject to your marketing preferences and your right to request that you stop receiving such communications.
- Responding to your queries or any requests that you may have.
- Handling internal and external complaints and dispute resolution.
- Monitoring, operating, maintaining, and improving our website.
- For our internal research, development, and optimisation of our services.
- Using de-identified information for our own purposes including market research, new product development and fraud mitigation.
- Complying with our legal and regulatory obligations or in connection with legal proceedings, crime or fraud prevention, detection, or prosecution.
- To assess any job application if you apply for a job with us.
- Any specific purpose that we notify you of at the time of collecting your personal information.

You authorise relevant third parties 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.
- Any platform provider we appoint, any trading participant that we appoint to facilitate trades on our behalf (acting as your agent) or any other person (including without limitation any agent of the above) for the purposes of or in connection with providing you 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 2020 or relevant applicable law.
- Where required by applicable law or any Court, or in response to a request by a law enforcement agency.

We will not disclose this information without first taking reasonable steps to ensure that the information is accurate, up to date, complete, relevant, and not misleading. Where we disclose personal information to a third-party, we will require that comparable safeguards are in place to ensure such third-party is bound by substantially similar obligations as set out in this Policy and the Privacy Act 2020. We will not sell or rent your personal information to any third party.

Where personal information is handled by third parties on our behalf, we remain responsible for ensuring that it is managed in accordance with this Policy and the Privacy Act 2020.

## **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 transferred, processed, used or stored by us and/or our third-party services providers in countries other than New Zealand for the purposes set out in this Policy and otherwise in accordance with New Zealand law. Where information is disclosed outside of New Zealand, unless we have your consent or an exception under the New Zealand Privacy Act 2020, we will take reasonable steps to ensure that the receiving party is required to protect your personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act 2020. If you are located in a European Union Member State, to the extent that we are subject to the European Union General Data Protection Regulation 2016/679 (“**GDPR**”), we will comply with our obligations under the GDPR in relation to the processing of any personal information that we hold about you. 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 APPENDIX - DATA DELETION REQUEST PROCESS 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.

## **HOW WE STORE AND PROTECT YOUR PERSONAL INFORMATION**

We will store your personal information as electronic records and in print form. 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. There are inherent risks in transmitting information through the internet. You can help us to protect your privacy by observing our security requirements and contacting us immediately if your contact details change or if you believe your security measures have been compromised.

## **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 2020.

## APPENDIX - DATA DELETION REQUEST PROCESS

### 1. User Rights to Data Deletion

As a valued client of BlackBull Markets, you have the right to request the deletion of your personal data that we process, subject to certain exceptions provided by law.

### 2. How to Request Data Deletion

If you wish to exercise your right to request the deletion of your personal data, please contact us by sending an email to our Compliance Team at [compliance@blackbull.com](mailto:compliance@blackbull.com) with the subject line "Data Deletion Request".

To help us process your request efficiently, please include the following information:

- Your full name and contact information.
- The specific data you wish to be deleted.
- Any relevant details that will help us locate your data (e.g. account number, transaction details).

### 3. Verification of Identity

For security purposes, we may need to verify your identity before processing your data deletion request. You may be asked to provide additional information or identification documents to confirm your identity.

### 4. Processing Time

We will acknowledge your data deletion request within 5 business days and aim to process your request within 15 days, depending on the complexity of the request and the volume of requests we receive.

### 5. Exceptions to Data Deletion

While we strive to honour your data deletion requests, there are certain exceptions where we may not be able to delete your data, such as:

- When we are required to retain your data for legal or regulatory compliance.
- When the data is necessary for the establishment, exercise, or defence of legal claims.
- When the deletion of data would impede the functionality of our services or affect other users' data.

### 6. Notification of Data Deletion

Upon completion of your request, we will notify you that your data has been deleted or inform you of any exceptions that prevent us from fully complying with your request.