



Privacy Policy

Our Commitment to Privacy

Asia Capital Markets LLC (ACM) recognises that it is important for you to know how we deal with your personal information and for that reason this statement outlines our current Privacy Policy.

Collection of Information

ACM is required under various legislation and codes of practice to collect certain information about you in order to provide our range of services. In addition, our ability to provide you with comprehensive and quality services is reliant on us obtaining certain personal information about you. The staff and representatives of ACM may request personal and sensitive information from you, which will generally comprise, but not be limited to, the following type of information:

- Personal details e.g. name, address, contact details (phone, email), date of birth, marital status, dependents, employment details;
- Information you provide to verify your identity, e.g. passport, proof of address;
- Business details including registered business number/s;
- Financial details e.g. assets, liabilities, income, expenses;
- Details of all investments, superannuation, investor numbers, credit card and bank account details;
- Information relating to the previous trading experience;
- Personal goals and objectives;
- Information about your transactions in financial products;
- Taxation information including your tax file number.

If you do not provide us with the information required, we may elect to terminate our relationship with you, if we believe it will jeopardise our ability to provide you with a complete, accurate and comprehensive service. We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us. Information will be collected from a variety of sources including directly from you, external organisations and associated companies of ACM. We only collect, maintain and use personal and sensitive information about you if it is necessary for us to adequately provide the services requested.

Use and Disclosure of Information

Any personal information about you collected by ACM will be used for the following purposes:

- Provision of investment services;
- Completion of associated documentation and application forms;
- To market services which may be supplied by ACM or by other suppliers that may be of interest to you, unless you inform us not to do so;
- To compile statistical analysis of the pages of the website you have visited;
- To participate in crime prevention, regulatory and legal compliance, including screening and comparing data against databases used for crime prevention purposes;
- To provide you with agreed services to assist in meeting your requirements, needs, goals and objectives.

The organisations we may be required to disclose information include, but are not limited to:

- Financial institutions (including fund managers, financial advisers, stock brokers);
- Government departments e.g. Government tax agencies, your countries financial governing body, and any other government department which may call upon ACM to provide them with your information as required by law;
- External service providers and other compliance inspectors for audit purposes;
- External parties for management of electronic communication;
- External parties contracted to perform services for ACM or on its behalf, such as service providers that provide data and transaction processing, IT maintenance and development and marketing services;
- Affiliated and external product and service providers for whom ACM acts as agent, so that they may provide you with the product or service you seek or in which you have expressed an interest;
- External parties for business acquisitions or in the event of the sale of the business;
- Any person acting on your behalf, including your financial adviser, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
- Any other external party as authorised by you from time to time.

Furthermore, we will not use or disclose information collected about you other than for a purpose made known to you unless the disclosure is:

- Required by law
- Authorised by law (e.g. to protect our interests or where we have a duty to the public to disclose); or
- You have consented to our disclosing the information to you.

ACM may disclose personal information when it outsources certain functions, including bulk mailing, market research, direct marketing, statement production, debt recovery and information technology support. ACM may also seek expert help from time to time to improve its systems, products and services.

ACM undertakes not to sell, rent or trade your personal information. We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however you may request not to receive such information by contacting the Privacy Officer as set out below.

Cookies

ACM collects the information about you electronically when you visit its websites. This information includes date and time of visit, number of pages viewed and how you navigate through our websites.

Cookies are small files containing information that a website uses to track its visitors. ACM may set and access cookies on your computer, enabling to learn which advertisements and promotions bring users to ACM website. ACM or any of its affiliates or divisions may use such cookies.

ACM uses cookies to capture data which helps in improvement of the service offered and the quality of content contained on ACM websites.

Storage and Security

ACM recognises how important the privacy of your personal information is to you. We will therefore, at all times, seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. Your personal information is generally held in your personal file. Information may also be held in a computer database. All paper files are stored in secure areas. Some of the information used for e-mail communication may be held in third party databases. Computer-based information is protected through the use of access passwords. In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure on/off-site storage facility for a period of at least 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

Identifiers

ACM will not adopt as our own any identifiers that you may provide to us such as Tax File Numbers, social security reference numbers, Medicare numbers etc.

Transfer of Information Overseas

This is required either when information is sent directly to the client, or to obtain further information from international organisations to aid services provided. Wherever possible, the information will only be transferred to another country where ACM reasonably believes the other country has privacy laws substantially similar to our own.

Access Your Information

You may at any time, request access to your personal information and we will provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We may, prior to providing access in accordance with this policy, require you to provide evidence of your identity. In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal. We will endeavor to respond to any request for access within 14 days depending on the complexity of the information and/or the request and may charge fees for the request of a significant amount of information to be copied or accessed.

Quality of the Personal Information

ACM is committed to ensuring that your personal information that we hold is accurate, complete and up to date. To assist us with this, please contact us if any of the details you have provided change. Furthermore, if you believe that the information we have about you is not accurate, complete or up to date, please contact us and we will take all reasonable steps to correct the information.

Privacy Complaints

If you wish to complain about any breach or potential breach of this privacy policy or the APPs, you should contact us, and request that your complaint be direct to the Privacy Officer as follows:

Privacy Officer
Asia Capital Markets LLC
Email: support@asiacapmarkets.com

We will make every effort to resolve your complaint internally and as soon as practicable and in any event within 30 days from receipt of your complaint. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact Saint Vincent and the Grenadines Financial Services Authority.

On-line Privacy

ACM's website may contain links to other Web sites whose operator may or may not adhere to a privacy policy or be governed by the APPs. We will not collect any information about you from our website except where you knowingly provide it to us. The information collected will depend on how you use the facilities on the website and may include some of the personal details stated above. For example, if you visit the website to browse or download information, our system will record the date and time of your activities, the information viewed and/or downloaded. In the event that you enter information in the process of completing an email or any other on-line forms, the information will be collected by ACM if you submit the details. Our website uses cookies, which allow us to identify your browser while you are using our site. Cookies do not identify you; they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers have a facility to notify you when you receive a cookie and you can elect to either accept it or not. Your internet service provider should be able to assist you to set your preferences.