

# **Daiwa Capital Markets Singapore Limited Sydney Branch**

## **Privacy Policy**

# Privacy Policy

**Daiwa Capital Markets Singapore Limited, Sydney Branch (Daiwa)** is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your personal information.

We manage your personal information in accordance with the Australian Privacy Principles (the **APPs**) contained in the Privacy Act 1988 (Cth) (the **Privacy Act**). The policy sets out how we comply with the APPs and Privacy Act in the way in which we collect, use, disclose, store, secure and dispose of your personal information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

## Terminology

In this Privacy Policy, the expression "**we**", "**us**" and "**our**" are a reference to Daiwa. The expressions "**you**" and "**your**" refer to each individual whose personal information we may handle from time to time where we are required to comply with the Privacy Act in respect of such personal information.

## What information do we collect?

### Personal information

We will only collect personal information that is reasonably necessary to deliver our services or conduct one or more of our functions or activities.

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.

Examples of personal information that we could collect include: names, dates of birth, addresses, email addresses, phone and facsimile numbers, bank details, income levels, tax identification number, passport numbers, drivers licence number (please note this is not an exhaustive list).

### Sensitive information

We will only collect your sensitive information with your consent or where required or authorised by law.

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Sensitive information means information or opinion about an individual's racial or ethnic origin, sexual orientation or practices, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

It is unlikely that Daiwa will collect sensitive information but examples of sensitive information that we could collect include criminal records, health records (please note this is not an exhaustive list).

## **How do we collect your personal information?**

We obtain personal information in many ways including **interviews, correspondence, by telephone and facsimile, by email, account opening forms, face to face meetings, and any other sources of information we may use/utilise in the normal course of business.**

Where reasonable and practicable to do so, we will collect your personal information only from you. However, in some circumstances we may be provided with information by third parties. We will only collect your personal information from third parties where:

- (a) you have consented to such collection;
- (b) collection is necessary for us to deliver our services to you; or
- (c) it is legally permissible for us to do so.

## **Why do we use your personal information?**

We use your personal information for the primary purpose of providing our services to you, including providing information to you about our services as well as for advertising and other marketing activities.

We may also use your personal information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure; for example, disclosure to third party contractors.

We will only use your sensitive information for the primary purpose for which it was obtained or for a secondary purpose that is directly related to the primary purpose or where required or authorised by law.

When we collect personal information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

If you do not provide us with your personal information, or you withdraw your consent for us to collect, use and disclose your personal information, we may be unable to provide our services to you.

## **Direct marketing**

We do not use your sensitive information for marketing purposes.

We will not use or disclose your personal information for the purposes of direct marketing to you unless:

- (a) you have consented to receive direct marketing materials;
- (b) you would reasonably expect us to use your personal information for this purpose; or
- (c) we believe you may be interested in the material but it is impracticable for us to obtain your consent.

Should you wish to unsubscribe from our mailing/marketing lists at any time, you can contact us in writing at [dataprotection@sg.daiwacm.com](mailto:dataprotection@sg.daiwacm.com).

Please note that even if you have requested not to receive further direct marketing communications, we may nevertheless continue to provide you with information about changes to our terms and conditions for the supply of our services or activities, and other factual information as permitted under the Privacy Act and *Spam Act 2003* (Cth).

## **Disclosure of personal information**

We may use or disclose your personal information for purposes connected with the primary purpose of collection, or reasonably related secondary purpose which we believe you should reasonably expect.

Your personal information may be disclosed in a number of circumstances including the following:

- other Daiwa Group entities;
- third parties where that third party is a contractor engaged to provide goods or services to us or where you consent to the use or disclosure; and
- where required or authorised by law.

Personal information you provide to us may be disclosed to Daiwa Group entities or other service providers located overseas. It is not practicable for us to specify in advance of the

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location of every service provider with whom we deal and their locations. However, typically we may disclose your personal information to entities in Singapore, Hong Kong, United Kingdom, Japan or any other Daiwa Group entity worldwide.

We may also disclose your personal information with your consent or where required or authorised by law.

## **Security of personal information**

Your personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information. However, most of the personal information is or will be stored in client files which will be kept by us for a minimum of 7 years to comply with other Australian law.

## **Access to your personal information**

It is an important to us that your personal information is up to date. We will take reasonable steps to make sure that your personal information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please contact us in writing at [dataprotection@sg.daiwacm.com](mailto:dataprotection@sg.daiwacm.com) so we can update our records and ensure we can continue to provide quality services to you.

You may access the personal information we hold about you and to update and/or correct it. If you wish to access your personal information, please contact us in writing at [dataprotection@sg.daiwacm.com](mailto:dataprotection@sg.daiwacm.com) or [cepheus.yap@sg.daiwacm.com](mailto:cepheus.yap@sg.daiwacm.com)

Daiwa will not charge any fee for your access request, but may charge a reasonable administrative fee for providing a copy of your personal information.

In order to protect your personal information, we may require identification from you before releasing the requested information.

We will respond to all requests for access and/or correction within a reasonable time.

## **Policy updates**

This Policy may change from time to time and a copy of this Policy can be obtained from our website or requested from us in writing at the email address: [dataprotection@sg.daiwacm.com](mailto:dataprotection@sg.daiwacm.com)

## Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy or the way in which we have handled any privacy issue, including your request for access or correction of your personal information, please contact us at:

Contact name: Cepheus Yap

Role: Director, Compliance

Address: Level 15, 88 Phillip Street, Sydney, NSW 2000, Australia

Telephone: +61 2 8991 500

Email: [dataprotection@sg.daiwacm.com](mailto:dataprotection@sg.daiwacm.com)

If you remain unsatisfied with the way in which we have handled a privacy issue, we suggest you approach an independent advisor or contact the Office of the Australian Information Commissioner ([www.oaic.gov.au/about-us/contact-us](http://www.oaic.gov.au/about-us/contact-us)) for guidance on alternative courses of action which may be available. We will provide our full cooperation in the event that you elect to pursue this course of action.