MOOMOO SECURITIES AUSTRALIA LTD Privacy Policy

1 Privacy generally

This privacy policy applies to the handling of personal information by Moomoo Securities Australia Ltd (ABN 51095920648,NZBN: 9429052402296) of Suite 5.01, Level 5, 570 George Street, Sydney NSW 2000, Australia (**Moomoo AU, we, us, our**).

Moomoo AU understands the importance of protecting an individual's personal information. This privacy policy sets out how Moomoo AU aims to protect your personal information, your rights in relation to your personal information held by Moomoo AU and how Moomoo AU collects, holds, uses, discloses, and otherwise manages, your personal information when we provide you with our products and services, and when you access our websites, applications and social media accounts.

This privacy policy applies in relation to our business in Australia and New Zealand. If:

- Australian privacy law applies to our processing of your personal information, in collecting, holding, using, disclosing and otherwise managing your personal information, Moomoo AU will comply with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (**APPs**) in the Privacy Act 1988;

- New Zealand privacy law applies to our processing of your personal information, in collecting, holding, using, disclosing and otherwise managing your personal information, Moomoo AU will comply with the Privacy Act 2020 and the Information Privacy Principles (**IPPs**) in the Privacy Act 2020.

Moomoo AU will regularly review its policies and procedures regarding personal information and may therefore update and amend this privacy policy from time to time. Any updated privacy policy will be made available on the Moomoo AU website, https://www.au.moomoo.com, or can otherwise be obtained by contacting us and requesting a copy.

2 Kinds of personal information collected

Personal information is information or an opinion about an identified, or reasonably identifiable, individual.

Moomoo AU operates an online brokerage through the moomoo trading platform offered by its affiliated entity, Moomoo Inc., with access to global stock exchanges and securities trading platforms to provide brokerage and general investment advisory services to retail and wholesale clients in Australia and New Zealand. In conducting this business, or as a result of our other interactions or dealings with you, Moomoo AU may collect your personal information.

The kinds of personal information that Moomoo AU collects will vary depending on our particular interaction or dealing with you. However, generally speaking, the kinds of personal information Moomoo AU collects may include:

(a) your contact information such as your name, occupation, address, telephone number, email address and date of birth;

(b) financial information such as your source of wealth, risk tolerance, investment experiences and objectives, transaction records, account balance and securities portfolio;

(c) proof of identity information such as your driver licence, electronic signature including for the purposes of the Contract and Commercial Law Act 2017 (New Zealand), *Electronic Transactions Act 1999* (Cth) and each equivalent legislation in the relevant state and territory in Australia or other similar identity information;

(d) your preference information regarding our products and services;

(e) audio recordings of telephone conversations between you and us;

(f) details regarding the transactions you undertake in respect of the Moomoo AU business;

(g) information collected via cookies and other tracking technologies when you visit our websites (see section 9 for more information); and

(h) other information necessary to provide you with information regarding our products or services or undertake any transactions or dealings with you.

Moomoo AU may also hold other kinds of personal information as permitted or required by law or other kinds of personal information that we notify you of at or about the time of collection.

Generally, we do not collect sensitive information about individuals. Information about your health, racial or ethnic origin, political persuasions, criminal record and religious or philosophical beliefs are all examples of sensitive information. If we do need to collect sensitive information about you, we will only do so with your consent or where we are required to do so by law.

3 How we collect personal information

Generally, Moomoo AU collects your personal information directly from you. For example, Moomoo AU may collect your personal information:

- when you register or apply for an account with us, request information or services from us, or otherwise provide us with your details;
- where you enter into, or propose to enter into, a transaction with us, including the provision of our products or services;
- where you use our websites, applications, products or other online services or otherwise interact with us; or
- if you post information to our website, application or any of our social media sites or otherwise interact with us.

There may be occasions when Moomoo AU collects your personal information from someone other than you, for example:

- from our other service providers that help us provide our services (for example, customer support information or payment information);
- from related entities of Moomoo AU, including but not limited to holding companies or affiliated companies;
- from third parties you authorise to disclose your information to us, including your financial institution or employer;

- from a publicly maintained record or other publicly available sources of information including social media and similar websites; or
- from third parties if you connect to our services or register an account with us using an external third-party application, such as Facebook or Google.

Generally, Moomoo AU will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect that personal information from you.

4 Purposes for which personal information is used

Generally speaking, Moomoo AU collects, holds, uses or discloses personal information so that we can maintain, improve and provide you with our products and services.

Some examples of the purposes for which Moomoo AU collects, holds, uses and discloses your personal information include to:

- determine your eligibility for products and services, including verifying your identity;
- administer services and products to you;
- communicate with you, including informing you of changes and updates to our policies, terms and conditions, and other administrative information;
- perform verification procedures, data verification, due diligence and risk management;
- help us to manage the services we provide to you, including personalising your experience with our services;
- provide you with marketing, advertising and promotional information, materials and/or documents relating to financial products that may be of interest to you or for which you may be eligible (as detailed in paragraph 5 below);
- verify your identity as part of initial and on-going Know-Your-Client due diligence processes and fulfill our obligations under applicable Anti-Money Laundering (**AML**) laws and regulations;
- authenticate and certify your electronic signatures including for the purposes of the *Contract and Commercial Law Act 2017* (New Zealand) and *Electronic Transactions Act 1999* (Cth) (Australia) and each equivalent legislation in the relevant state and territory in Australia;
- enforce obligations owed to us;
- respond to your queries and provide you with information you request from us;
- conduct our business and facilitate the supply of our services to you;
- contact you to obtain your feedback regarding our products or services or to conduct other market research;
- administer, manage and process any transactions you enter into, or propose to enter into, with us;
- conduct investigations in cases of fraud, credit or data security risks;

- analyse the information we collect so that we can administer, support, improve and develop our business and the services we offer (including by monitoring or recording our interactions with you for training purposes);
- assist other financial institutions to conduct credit checks and collect debts where permitted by law;
- establish, exercise or defend a legal right or to participate in any legal or administrative proceedings; and
- comply with the obligations of Moomoo AU under any applicable laws, regulations, rules, directives, orders, instructions, guidance and requests from any local or foreign authorities, including regulatory, governmental, tax and law enforcement authorities.

In addition to the purposes listed above, Moomoo AU may use your personal information for purposes related to the above purposes, other purposes which we notify you of when we collect the information and for purposes otherwise permitted or required by law.

Where personal information is used or disclosed, Moomoo AU takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to Moomoo AU. However, without certain information from you, Moomoo AU may not be able to provide services or information to you or may be limited in how we can interact with you.

5 Use of personal information for marketing purposes

In addition to the purposes outlined in paragraph 4 above, Moomoo AU may use and disclose your personal information in order to inform you of promotions, competitions, giveaways, events, goods or services that may be of interest to you. This may include Moomoo AU disclosing the information to related companies of Moomoo AU or other entities with which Moomoo AU has a commercial relationship or arrangement for the purpose of the other entity contacting you for such marketing purposes. We may also use your personal data to invite you to participate in marketing research, surveys and other similar activities. Your mobile information (including name and mobile phone numbers) under 10DLC campaign will not be shared or sold to third parties (other than any affiliates of the Moomoo AU) who will use such information for marketing/promotional purposes.

You can choose to receive marketing and other promotional materials through various modes including but not limited to email, direct mailers, short message service, telephone calls, facsimile and other mobile messaging services. In respect of sending telemarketing messages to your Australia telephone number via short message service, telephone calls (voice or video), facsimile and other mobile messaging services, we will do so only if You have provided your clear and unambiguous consent in writing or other recorded form for us to do so. We will also obtain your consent to receive other electronic marketing communications (such as via email) where required by law.

If you do not wish to receive such communications, you can opt-out by contacting Moomoo AU via the contact details set out in paragraph 12 of this privacy policy or through the opt-out mechanism contained in a marketing communication to you.

6 Disclosure of personal information

Moomoo AU discloses your personal information for the purpose for which Moomoo AU collects it. As a result, generally, Moomoo AU may disclose your personal information for a purpose set out in paragraphs 4 and 5 of this privacy policy, to the following persons (whether in your country of residence or overseas). This may include disclosing your personal information to:

- related companies of Moomoo AU including but not limited to holding companies or affiliated companies located within and outside your country of residence;
- service providers and contractors and other third parties and their respective officers, employees, agents or subcontractors located within and outside your country of residence who provide goods or services to us (including our technology service providers, our business consultants, risk, credit, compliance and identification verification companies, legal and accounting firms, auditors, insurers and other professional advisers or administration service providers);
- other third parties that are integral to the provision of our services located within and outside your country of residence (including financial institutions and other payment processors and their respective officers, employees or agents);
- third party service providers for identity verification or Anti-Money Laundering compliance related purposes;
- people or entities considering acquiring an interest in Moomoo AU or any business or assets of Moomoo AU;
- other parties who invest in or acquire an interest in Moomoo AU or any business or assets of Moomoo AU;
- relevant regulatory bodies, government, tax authorities, law enforcement agencies or other administrative, self-regulatory or statutory agencies, or stock exchange or clearing house where required by law; and
- any other party to whom you authorise us to disclose your personal data to.

Moomoo AU may also disclose your personal information for other purposes if we notify you of the disclosure before, at or about the time of collecting the information, we have otherwise received your consent or the disclosure is required or authorised by law.

If you post information or other content to public sections of our websites or to our social media sites, you acknowledge that the information or content may be viewed by the public and/or users of the relevant website or social media site.

7 Overseas disclosures

Moomoo AU may transfer your personal information to countries/territories outside Australia and New Zealand where any of our related companies or service providers may be located, and these related companies or services providers may store, transfer or access personal information outside of Australia and New Zealand. Additionally, some recipients of your personal information may be 'foreign persons or entities' (as defined in New Zealand's Privacy Act 2020). Moomoo AU may also store your personal information on servers in the country/territories outside Australia and New Zealand. To the extent that we may need to transfer, store or access your personal information overseas, you will be deemed to accept their jurisdiction over your information but we will adequately and equally protect the personal information so transferred or stored and ensure that we provide a standard of protection that is comparable to the protection under the privacy legislation applicable to our processing of your personal information.

We will only disclose your personal information to countries with laws which protect your personal information in a way which is substantially similar to the APPs or IPPs (as applicable to you) and/or we take reasonable steps to ensure that any such overseas recipients do not hold, use or disclose your personal information in a way that is inconsistent with the obligations imposed under the applicable privacy legislation.

8 Links to other websites

When you access our websites or other online services, we may provide as a convenience to you links to other websites, including websites operated by our partners, associates, or independent third parties. These links are provided as a convenience to you. Each website has its own privacy practices, as described in that website's privacy policy. Those practices may be different than the practices described in this privacy policy, and we encourage you to read each website's privacy policy carefully before you use or submit information to that website. Additionally, to the extent that you follow a link to a website operated by an independent third party, please be aware that we exercise no authority or control over that third party, and cannot be and are not responsible, to the maximum extent permitted by law, for any information that you may submit to that website.

9 Cookies

When you visit our websites or other online services, we will generally leave a 'Cookie' in the memory of your web browser. The website or other online service may only function properly if Cookies are enabled. Our websites and online services may use persistent Cookies to authenticate you as a user and display content that is relevant and specific to you.

Cookies are very small files that store information about your visit to and use of a website. Most major commercial Internet sites use them and they make your Internet surfing more useful and less time-consuming because they store information that is reusable each time you visit our website, such as birthday and other preferences you have chosen to share with us.

Cookies cannot access and read the files on your hard drive. They do allow us to provide information and products that are more meaningful to you without asking you the same questions every time you visit us. You may get Cookies from our advertisers. We cannot pre-screen these Cookies since they come directly to you from other sites. We hope you will want the better service that Cookies allow, but if you prefer, you can set your browser to refuse Cookies. However, by doing that, your access to our website, https://www.moomoo.com/nz, may be compromised or limited. This may also affect the provision of certain services through our website.

10 Security of personal information

Moomoo AU takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure.

Moomoo AU holds personal information in electronic forms in secure databases on secure premises, accessible only with the appropriate passwords by authorised staff, contractors or agents on a "need to know" basis and is disclosed or shared using secured methods (personal information is encrypted when necessary). Where personal information is held in hard copy, it will be held in controlled, access restricted premises which only authorised personnel or contractors will be permitted to access.

The processes and systems we use to secure your personal information include:

(a) the use of identity and access management technologies to control access to systems on which information is processed and stored;

(b) the implementation of strict internal security standards and confidentiality policies when sharing of personal information between related companies of Moomoo AU;

(c) requiring all employees to comply with internal information security policies and keep information secure;

(d) requiring all employees to complete training about information security; and

(e) monitoring and regularly reviewing our practice against our own policies and against industry best practice.

We have in place procedures for training our employees about their obligations under this privacy policy, disciplining them for failure to follow this privacy policy. We also have in place internal procedures to confirm general company compliance with this privacy policy.

Moomoo AU will destroy or de-identify personal information in circumstances where it is no longer required, unless Moomoo AU is otherwise required or authorised by law to retain the information.

11 Access and correction

Moomoo AU takes steps reasonable in the circumstances to ensure any personal information it holds is accurate, up-to-date, complete, relevant and not misleading.

In addition, under the *Privacy Act 1988* (Cth) and Privacy Act 2020 (New Zealand), you have a right to seek access to and correction of your personal information that is collected and held by Moomoo AU. If at any time you would like to access or correct the personal information that Moomoo AU holds about you, or you would like more information on Moomoo AU's approach to privacy, please contact Moomoo AU using the details set out in paragraph 12 below. Moomoo AU will grant access to the extent required or authorised by the applicable privacy law or other laws and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- Moomoo AU requests that you be reasonably specific about the information you require; and
- where permitted by law, Moomoo AU may charge you a reasonable administration fee, which reflects and will not exceed the cost to Moomoo AU for providing access in accordance with your request.

For individuals in Australia, Moomoo AU will endeavour to respond to your request to access or correct your personal information within 30 business days from your request. For individuals in New Zealand, Moomoo AU will endeavour to respond to your request to access or correct your personal information within 20 business days from your request. If Moomoo AU refuses your request to access or correct your personal information, Moomoo AU will provide you with written reasons for the refusal and details of complaint mechanisms.

If you are dissatisfied with Moomoo AU's refusal to grant access to, or correct, your personal information, you may make a complaint to the Office of the Australian Information Commissioner (in Australia) or the Office of the Privacy Commissioner (in New Zealand).

12 Contacting Moomoo AU

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications or make a privacy complaint, please contact Moomoo AU using any of the following contact details:

Email: support@nz.moomoo.com

Post: Suite 5.01, Level 5, 570 George Street, Sydney NSW 2000, Australia

13 Privacy complaints

Please direct all privacy complaints to Moomoo AU. At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect the commercial arrangements between you and Moomoo AU.

Moomoo AU will acknowledge your complaint within 14 business days of receipt and endeavour to resolve it within 30 business days, unless Moomoo AU informs you otherwise and seeks your agreement in writing.

Moomoo AU will commence an investigation into your complaint. You will be informed of the outcome of your complaint following the completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, or an extension to the time in which Moomoo AU will resolve it, you may refer the complaint to the Office of the Australian Information Commissioner (in Australia) or the Office of the Privacy Commissioner (in New Zealand).

14 Non-privacy complaints

Please direct all other complaints to Moomoo AU.

For Australian Individuals

Moomoo AU will investigate your complaint and you will be informed of the outcome of your complaint following the completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, and subject to the dispute procedure set out in the Moomoo AU Website Terms of Use, you may make a complaint to the Australian Financial Complaints Authority.

For New Zealand Individuals

Please refer to the dispute procedure for New Zealand individuals set out in the Moomoo AU Website Terms of Use.