

Privacy Policy

Trading 212 AU Pty Ltd (ABN 46 660 342 763)(AFSL No. 541122) is an Australian member of the Trading 212 Group. The Trading 212 Group comprises of:

- Trading 212 AU Pty Ltd, incorporated and licensed in Australia (referred to in this policy as **“we”**, **“us”** or **“Trading 212”**)
- Trading 212 UK Limited, incorporated and licensed in the United Kingdom (**“T212 UK”**),
- Trading 212 EOOD, incorporated and licensed in Bulgaria (**“T212 BG”**),
- Trading 212 Markets Limited, incorporated and licensed in Cyprus (**“T212 CY”**),

Trading 212 is bound by and operates in accordance with the Australian Privacy Principles (**“APPs”**) contained in the Privacy Act 1988 (Cth). You may obtain a copy of the APPs from the website of The Office of the Australian Information Commissioner (**“OAIC”**) at www.oaic.gov.au.

This Privacy Policy sets out how we collect, use, store, share and disclose your personal information. If you have any questions about this document please contact us at info@trading212.com.

By providing personal information to us, you consent to our collection, holding, use, and disclosure of your personal information in accordance with this Privacy Policy.

All words and phrases highlighted and not defined in this Privacy Policy, shall have the same meaning as defined in our Invest Terms (as applicable).

What is personal information?

'Personal information' is 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 include an individual's name, address, contact number and email address.

The types of personal information we collect

We may collect the following types of personal information:

- name;
- residential and postal address;
- email address;
- phone and/or mobile number;
- date of birth;
- bank account details;
- credit/debit card details
- ApplePay or GooglePay details
- Tax File Number;
- copies and details of government issued identification documents (such as Passport, Drivers License, Medicare); and
- any other information you may provide to Trading 212 including but not limited to;
 - IP addresses, device and browser information when using our Website or Trading Platform (and other associated details, including your geographic location, the date and time of your visit to our Website, pages viewed, frequency and duration of your visit, the URL of the website that you viewed before our Website, browser plug-in type and version, your operating system and platform);
 - Information about your financial status (i.e. income and savings) or other financial information about your profession and employment details;
 - any type of electronic communication such as letters, emails, chat messages, surveys and telephone conversations where you provide your feedback and opinions about our products and services;

How we collect personal information

We collect personal information in a variety of ways, including:

- when you access our Website or Trading Platform to participate in trading or to create an account; or
- when you interact with us in writing via email or post, by telephone, or online by signing up to receive information from us.
- when you interact with us via social media, content, and marketing.

The purposes for which we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information for a range of purposes including to:

- provide the Services to you as part of our Agreement;
- verify your identity and opening and managing your account;
- meet our regulatory obligations;
- process requests for you relating to the Services (such as deposit and withdrawals, transactions, tax and other information requests);
- manage our relationships with You by electronic, telephone or chat communication;
- enter into and executing transactions with financial instruments;
- open a demo/practice account with us;
- conduct risk management control, data analysis and global supervision of your ongoing needs;
- enhance, improve and personalise our Services to better your experience;
- provide you with market information that we believe may be relevant or of interest to you;
- send you important account and Services related data. (Just so you know these may be by different communication channels such as surveys, in-app notifications, platform messages and emails);
- prevent misuse and fraud, demonstrating business transactions and communications;
- manage transactions surveillance and monitoring and complying with reporting obligations;
- perform administrative tasks and internal record keeping;
- manage risks, disputes, complaints or litigation in the context of legal or administrative proceedings; and

- conduct further searches and enquiries regarding the information you have provided to us or more generally to collect additional personal information about you or your associates for our regulatory or prudential purposes.

We may use and disclose your personal information for other purposes required or authorised by or under law (including purposes for which you have provided your consent).

Direct Marketing

We may use your personal information so we can contact you with information about our products and services, special offers, promotions and events that may be of interest to you.

We may use an 'email management system' to automate the management and dispatch of these emails. The system operates by inserting tracking codes in the emails that we send to you. The tracking code allows us to collect personal information about you, such as whether you received and opened an email, and whether you clicked through to any links to our Website.

The personal information that the email management system collects and holds about you is used by us to:

- ensure that you only receive correspondence that you have informed us that you wish to receive;
- insert your personal information into our communications with you;
- determine whether the information that we send to you is suitable for your interests, information needs and profile;
- ensure that the email address that you have provided us is still operational;
- determine whether emails that we send to you are received by you;
- update a request that you make to us to unsubscribe from a publication that we send to you; and
- review the effectiveness and relevance of our emails to you by collecting other statistical information.

We may contact you by email. If you do not wish to receive promotional offers you may unsubscribe from receiving these communications at any time by hitting the "Unsubscribe" button at the bottom of the email.

What if you don't provide personal information to us?

If we are not able to collect personal information about you, we will not be able to verify your identity and as such, you will not be able to open an Account or use our Trading Platform. You can contact us to make a general query without using your name or by using a pseudonym. However, we may need your name or contact details to respond to you.

Disclosure of personal information to third parties?

In conducting our business, we may disclose your personal information to third parties for the purposes outlined above. These third parties may include the following recipients:

- other companies within the Trading 212 Group. Personal information may be transferred in order to allow us to provide a full service to you, where other companies within the Trading 212 Group perform components of the full-service offering including IT maintenance or support services;
- any lawyers, external auditors or advisors, professional consultants, credit reference agencies, bailiffs, law enforcement agencies, as well as any courts, regulatory, governmental, administrative and/or other official bodies as agreed or may be required by law, where such disclosure is necessary to:
 - a. comply with any applicable law or regulation;
 - b. enforce applicable terms and conditions or policies;
 - c. protect the security or integrity of our Services; and
 - d. protect our rights and interests;
- third-party service providers that provide IT services, advisory and consultancy services, research, marketing services, identity verification checks, banking and payment processing services, insurance or other services to Trading 212, which are only authorised to process your personal information strictly for the purposes of providing these services and in accordance with our instructions. If applicable, we will enter into contractual agreements containing standard data protection clauses with such third parties to ensure compliance with our instructions;

- Third parties to facilitate your assets transfers upon your request; and
- Third parties to facilitate your participation in qualifying Corporate Actions.

We may disclose your information to other third parties and for other purposes where we are required or authorised by or under law to do so (including where you have provided your consent).

We will not sell your information to third parties for their own independent marketing or business purposes without your consent.

Be aware that when you are using our AI chatbot assistant, you should not share any personal or sensitive information with it. Should such details be shared, the AI chatbot may share them with a third party outside Trading 212. Therefore, please use the AI chatbot for asking general questions only - if you need to discuss personal information, please request that you speak to a human.

Overseas disclosures of personal information

Some of our service providers and related companies are located outside Australia. As a result, personal information collected and held by us may be transferred to recipients in other countries. In particular, we may disclose personal information to our related companies located in the UK and/or the European Economic Area (“EEA”). These related companies may, for example, be involved in the execution of our support services.

We may also disclose personal information to service providers located overseas (including EEA and the UK) so that they can provide us with services in connection with the operation of our business, such as marketing services and data storage.

We will take all necessary steps to ensure that your personal information is treated securely and in accordance with this Privacy Policy and will adopt appropriate safeguards to protect it.

How will we store your personal information?

Your information will be held on our secure computer systems in the UK and EEA.

We put a lot of effort into, and apply the highest technical and organisational standards, ensuring that your personal information is secured and kept confidential. Any personal information that you provide to us is stored on secure servers, and is password protected with access being appropriately limited. We use rigorous procedures to protect against loss, misuse, unauthorised access, alteration, disclosure, or destruction of your personal information.

We protect your personal information by maintaining physical, electronic, and procedural safeguards in compliance with the applicable laws and regulations. Part of the measures that we apply to provide a high level of security in terms of personal information management include:

- pseudonymisation – we process your personal information in such a manner that it can no longer be attributed to a specific person without the use of additional information. This additional information is kept separate and is subject to specific technical and organisational measures to ensure that the personal information is not attributed to an identified or identifiable natural person;
- hashing/Encryption – we may apply cryptographic methods which convert certain information or data into a code to make it unreadable for unauthorised users;
- minimisation – the personal information we request from you is adequate, relevant and limited to only what is necessary in relation to the purposes for which such personal information is required;
- strict internal control on access to your personal information – access to your personal information is allowed only to those of our employees who require such information to properly exercise their professional duties;
- penetration testing – we perform regular scanning and penetration testing against our applications and services to identify potential security vulnerabilities and apply the relevant remedies to rectify them;
- education – we ensure our management and employees have completed appropriate training to foster a privacy and security aware culture; and

- maintaining security and incident response plans.

Cookies

Please refer to our Cookies Policy found [here](#).

Links

Our website may contain links to other websites. We do not share personal information with those websites and are not responsible for the privacy practices of those websites. Privacy policies that apply to other websites may vary from our Privacy Policy. We encourage you to read them before using those websites.

How long will we store your personal information?

As required by law, we will store information about you for a period of 7 years.

Unless required by law or due to any outstanding claims, we will generally not hold your personal information longer than this period after our arrangement with you has ceased.

Access and correction

You have a right to request access to personal information that we hold about you and request its correction if it is inaccurate, out of date, incomplete, irrelevant or misleading.

To protect your privacy and the privacy of others, we may require evidence of your identity before we can give you access to information about you or change it.

If you wish to access or correct your personal information, you should contact us via email at info@trading212.com.

We will generally provide you with access to your personal information (subject to some exceptions permitted by law) but may charge an access fee to cover the cost of retrieving the information and supplying it to you.

How to contact us or lodge a complaint?

We welcome your questions and comments about how we manage your privacy. If you have any concerns or believe we have not complied with the Privacy Act, the APPs or this Privacy Policy, please contact our Data Protection Officer at

Trading 212 AU Pty Ltd.

Email: dpo.au@trading212.com

Address: Level 5, 11-17 York Street,
Sydney 2000

We will consider your complaint through our internal complaints resolution process and will try to respond with a decision within 30 days of you making the complaint. For more information on our complaints handling process, please refer to our Public Complaints Policy available on our website.

If you are not satisfied with our response, you may contact and lodge a complaint with the OAIC via:

Website: www.oaic.gov.au/privacy/privacy-complaints

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Changes to this Privacy Policy

From time to time, it may be necessary for us to review and revise our Privacy Policy. We may notify you about changes to this Privacy Policy by posting the updated version on our Website. We encourage you to check our Website from time to time to ensure you are familiar with our latest Privacy Policy.

This version of this Privacy Policy is dated 09 February 2024.