

BLACKWELL GLOBAL INVESTMENTS LIMITED

PRIVACY POLICY

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This Privacy Policy (hereafter “Policy”) outlines how Blackwell Global Investments Limited (hereafter “Blackwell Global”, the “company”, “we”, “us”, “ours”) collects, uses, manages and discloses your personal information, and ensures that it remains confidential and secure. Your use of the Company’s website(s) constitutes acceptance of the terms of this Policy.

Our Privacy Policy will be reviewed from time to time to take account of new laws and technology and any changes to our operational processes, and any amendments to this Policy will be incorporated in an updated version onto the Company’s website. Your subsequent use of the website constitutes acceptance of those changes, and any information we hold will be governed by our most recent Policy.

1. Collection and Use of Personal Information

1.1 Blackwell Global needs to collect certain personal information to be able to offer its range of financial products and services to its Clients. The Company collects and maintains personal information of the Client from the following sources:

- account application forms and other documents and data submitted by the Client, such as name, address, date of birth, contact details, employment and income information, investment experience;
- funding transactions with Blackwell Global such as account deposits and withdrawals that require bank account information to be provided;
- trading history including the products traded and its performance, historical date about the trades and investments made and amount invested.

1.2 Blackwell Global may also be required to collect and maintain information from external sources, such as credit reference and identity verification agencies. Periodically, we may ask you to voluntarily provide us with information for our marketing or survey purposes.

1.3 Blackwell Global will use your information for the purpose of opening and maintaining an account, confirming your identity, managing your profile and trading account and to enable us to provide you with the products and services that you have requested from us. Unless you have advised us to the contrary, we will also communicate with you about relevant information and opportunities relating to existing and new products and services which we consider suitable for you.

2. Disclosure of Personal Information

2.1 In the standard operation of our business, Blackwell Global may disclose your personal information to the following:

- our associated companies;
- our third party service providers and professional advisors;
- credit agencies;
- any organizations or person expressly instructed by you;
- any relevant regulatory, governmental or law enforcement authority as required by law;
- third parties necessary to provide the products and services as requested by you.

2.2 Blackwell Global requires non-affiliated companies who handle or obtain personal information as service providers to acknowledge the confidentiality of the received information, and to undertake to respect any individual’s right to privacy and comply strictly with the Policy.

2.3 Blackwell Global will not use or disclose or sell, rent or lease any personal Information of current or former clients to any third parties except as stated in this Policy. Personal Information may be transferred across national borders for the purposes of data consolidation, storage and/or customer data management.

3. Retention of Information

3.1 Client’s personal information will be retained for as long as it is necessary and required to provide clients with products and services, and subject to the relevant laws and regulations for Blackwell Global to meet its legal requirements.

4. Security of Information

4.1 The privacy and confidentiality of your personal information is of fundamental importance to us. We take all appropriate security measures to protect against unauthorised access or unauthorised alteration, accidental or unlawful disclosure or destruction of data and personal information.

4.2 We restrict access of personally identifiable information to authorised employees who need to know the specific information strictly for business purposes only, in order to operate, develop or improve our services or to perform a specific job.

5. Cookies

5.1 When using the Company's websites, we may use cookies to collect information. A cookie is a small data file that is stored on your computer, for the purpose of making it easier for you to navigate the website by for example; remembering your IDs, passwords and viewing preferences, thus allowing you to visit member-only areas of the website without logging in again. You can set your web browser to inform you when cookies are enabled, or to disable cookies. If you do not wish to receive cookies, most web browsers will permit you to decline/disable cookies and in most cases will still allow you complete access to our websites.

6. Links to third party websites

6.1 Our websites may have links to external third party websites. It should be noted these third party websites are not covered by this Policy and are not subject to Blackwell Global's privacy standards and procedures. Clients are advised to review the privacy policy of any third-party websites before accessing or submitting any personal information.

7. Your Rights

7.1 You are able to obtain a copy of any personal information which we hold concerning you and for you to advise us of any perceived inaccuracy.

7.2 You may request at any time that we amend, update or (subject to our necessary legal, regulatory and business requirements) delete personal information which we hold concerning you. Please contact us at cs@blackwellglobal.co.nz to effect the relevant changes on your behalf.

8. Legal disclaimer

8.1 Blackwell Global reserves the right to disclose your personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served.

9. Updates to the Privacy Policy

9.1 Blackwell Global reserves the right to change or amend the Privacy Policy without further notice to you, provided that the changes do not significantly reduce your rights under this Policy. If we make material changes to this Policy, we will notify you by email or by means of a notice on our website.

9.2 The latest and prevailing version of this Policy will be at all times available at www.blackwellglobal.co.nz. Any revised Policy will be effective immediately upon posting on our website(s).

10. Contact Us

10.1 If you have any complaints, questions or comments regarding your data or this Policy, you are welcomed to contact us at compliance@blackwellglobal.co.nz.