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## Privacy Policy

Syndex's Privacy Policy specifies how and why personal information is collected from Participants and how it is used and protected.

1. Syndex is committed to protecting all personal information ("Information") collected from Participants as part of fulfilling its regulatory obligations.
2. This Policy does not limit or exclude a Participants rights under the Privacy Act 1993.
3. Registration
  - 3.1. Information is collected from Participants when they register on Syndex or from time to time as required.
  - 3.2. Participants consent by default to the collection, use, disclosure, storage, and processing of Information as part of the registration process.
  - 3.3. This Policy applies to all instances where Information is collected from Participants.
4. Participants authorise Syndex to collect, hold and use Information for the purposes of:
  - 4.1. opening, operating, administering and maintaining their account on the Exchange and any products or services provided to them by Syndex or Syndex's related companies (whether incorporated in New Zealand or elsewhere);
  - 4.2. confirming their identity and address, for example, electronically matching Information with identification information in third party databases;
  - 4.3. providing them with the use of, and information about, any other of Syndex's products and services and products and services of Syndex's related companies (whether incorporated or constituted in New Zealand or elsewhere);
  - 4.4. both Syndex and/or Syndex's related companies (whether incorporated or constituted in New Zealand or elsewhere) complying with regulatory and other requirements;
  - 4.5. managing the relationship so, for example, Syndex can respond to their queries;
  - 4.6. monitoring and screening their accounts, products and services for anti-money laundering and countering financing of terrorism purposes and for fraud and crime detection purposes; and
  - 4.7. conducting market research, data processing and statistical analysis.
5. Participants authorise Syndex to obtain, and retain, Information from Syndex's related companies (whether incorporated or constituted in New Zealand or elsewhere) for the purposes described in clause 4.
6. Participants agree that the Information may be given to:
  - 6.1. Syndex's related companies (whether incorporated or constituted in New Zealand or elsewhere) that provide services to, or for Syndex;
  - 6.2. Syndex's agents and other third parties (whether in New Zealand or overseas) that provide services to, or for Syndex;
  - 6.3. any other applicable or replacement registry;
  - 6.4. any capital market regulator where Syndex is required to do so by law;

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- 6.5. the police, certain governmental agencies or other financial institutions where Syndex reasonably believes that disclosure will assist the investigation, detection or prevention of fraud or other criminal offences or where we are required by law;
  - 6.6. credit reporting agencies, other credit providers and debt collecting agencies;
  - 6.7. research firms engaged by Syndex to carry out customer surveys and conduct market research; and
  - 6.8. any other party authorised by the Participant.
7. The Participant further authorises the release to Syndex of any Information held by credit reporting agencies and credit providers and authorises Syndex to disclose Information held about themselves to credit reporting agencies and Syndex's customers, when they use Syndex's credit reporting services, for the purpose of monitoring the Participant's on-going creditworthiness.
  8. Participant Information will be collected and held by Syndex. The Participant has rights of access to, and correction of, any personal information (as defined in the Privacy Act 1993) held by Syndex.
  9. All reasonable steps will be taken to ensure that Information is treated and kept as confidential by all third-parties who receive the Information.
  10. The following Information will be collected:
    - 10.1. All relevant Information associated with a Participant as an individual, company, trust or other entity.
    - 10.2. Designated bank account number.
    - 10.3. Preference information such as a favourites list, transaction history and marketing preferences.
    - 10.4. All communications initiated via writing, email or phone.
    - 10.5. Information obtained from third parties in accordance with this Privacy Policy.
    - 10.6. Other additional Information required from time to time.
  11. If a Participant refuses to provide mandatory Information they may not be able to register and may not be able to participate in any of Syndex's markets.
  12. Syndex will take all reasonable steps to ensure that the Information that has been collected, used or disclosed is accurate, complete, up-to-date and stored in a secure environment protected from unauthorised access, modification or disclosure.
  13. Information will be kept in accordance with the legislation.
  14. Syndex may set and access Cookies on Participant computers in order to collect non-personal information including type of operating system, domain name and IP address. The information collected is anonymous and is used for the purpose of understanding Participant behaviour when using the Syndex platform.