

# Privacy Policy

**First Index**

## Privacy Policy

AGM Markets Pty Ltd (ABN 87 158 706 766) (AFSL No. 422662) (trading as First Index) (**AGM Markets, First Index, we, our, or us**), takes privacy seriously. We value your trust and understand that protecting your personal information is a vital part of our relationship with you. We will act to protect your personal information in accordance with the Privacy Act 1988 (Commonwealth) (**Act**) and the National Privacy Principles.

### What is “Personal Information”?

Personal information is information or opinion that allows others to identify you. It includes your name, age, gender, contact details, as well as your health and financial information.

### Collecting Personal Information

Whenever it is reasonable and practical to do so, we will only collect information about you directly from you. Sometimes personal information may be collected about you from other sources. In most cases we will require you to consent specifically to any collection, use or disclosure of your personal information by us. Your consent will usually be required in writing but it may be oral or implied in some circumstances.

No matter how your personal information is collected, it is dealt with by us in accordance with this Privacy Policy.

### Using Personal Information

We collect personal information about you which is reasonably necessary to provide you with the products and services you request as well as other information, products and services offered by or through us. Your personal information will also assist us in considering applications you make to us.

Personal information may also be used for:

- monitoring and evaluating products and services;
- gathering and aggregating information for statistical, prudential, actuarial and research purposes;
- assisting clients with queries;
- taking measures to detect and prevent fraud;
- administering our client relationships; and
- complying with our legal obligations and regulatory requirements. This may include making certain records available for inspection by ASIC, ATO and AUSTRAC.

We may also use the personal information collected from you for the purpose of providing you with direct marketing materials such as research or articles that maybe of interest to you. You may, however, request not to receive such marketing materials by contacting First Index. We do not generally collect sensitive information about you unless required by law. Sensitive information includes but is not limited to:

- race
- political or religious beliefs
- sexual preferences

Personal information collected by First Index generally comprises of: name, address, date of birth, gender, marital status, occupation, account details, contact details (including telephone, facsimile and e-mail) and financial information. Sometimes we collect a few personal details unlikely to be known to other people in order to help us identify you over

the telephone.

If it is necessary to do so, we also collect information on individuals such as:

- trustees;
- partners;
- company directors and officers;
- officers of corporations;
- customer's agents; and
- persons dealing with us on a "one-off" basis.

We may take steps to verify the information we collect; for example, a birth certificate provided as identification may be verified with records held by the Registry of Births, Deaths and Marriages to protect against impersonation and fraud. This is also to ensure we comply with the Anti-Money Laundering and Counter Terrorist Act 2006 and AGM Markets' AML/CTF Program.

### **Your Consent**

First Index will obtain your consent for use of personal information for secondary purposes at the time of collection, unless the use is a related secondary purpose which would be within your reasonable expectations.

### **What if You Provide Us with Incomplete or Inaccurate Information?**

We may not be able to provide you with the products or services you are seeking. We take reasonable steps to ensure that all information we hold is as accurate as possible. You may contact us at any time and ask us to correct or amend the information we have about you.

### **Keeping Your Personal Information Secure**

We use security procedures and technology to protect the information we hold. Access to and use of personal information within First Index is appropriately limited to prevent misuse or unlawful disclosure of the information. At all times your personal information is treated as confidential and stored securely. Access to our premises is controlled by allowing only personnel with security passes to access the premises. All computer based information is protected through the use of access passwords on each computer.

We will destroy personal information if it is no longer needed:

- for the purposes for which it is collected; or
- for the purposes of meeting legal requirements.

We will properly dispose of all files, letters and correspondence (hard copy or electronic) that contain personal information that is no longer needed.

### **Outsourcing and Disclosing to Third Parties**

We disclose personal information when we outsource certain functions, which may include market research, direct marketing, statement production, debt recovery and information technology support. We also seek expert help from time to time to help us improve our systems, products and services.

In all circumstances where personal information may become known to our contractors, agents and outsourced service providers, there are confidentiality arrangements in place. Contractors, agents and outsourced service providers are not able to use or disclose personal information for any purposes other than our own.

We make every effort to deal only with parties who share and demonstrate the same values as our own.

### **Disclosure Required By Law**

We may be required to disclose customer information by law e.g. under court orders or statutory notices pursuant to taxation or social security laws or under laws relating to sanctions, anti-money laundering or counter-terrorism financing.

### **Tax File Numbers**

We only use and disclose your Tax File Number or other government agency identifier for the purposes required by law such as disclosure to the ATO.

### **Accessing Your Personal Information**

You can request to access your information by contacting us (see our contact details below). Generally, we will give you access to your information. However, there may be some legal or administrative reasons to deny access. If access is denied, we will provide you with the reason why.

### **Cookies**

A 'cookie' is a packet of information placed on a user's computer by a website for record keeping purposes. Cookies are generally used on the First Index site:

- to access online services – if you visit First Index website and log into our secure areas, we will use cookies to enable us to authorise your access;
- to manage advertising – we use advertising companies to deliver our online advertising. When you see one of our ads on a third party website, cookies are sometimes used to collect information about what pages you visit and the type of software you are using; and
- traffic monitoring – we use tracking companies to gather information about how people are using the First Index site, this information includes time of visit, pages visited, and some system information about the type of computer you are using. We use this information to enhance the content and services offered on the site.

Cookies may also be used for other purposes on the AGMM site but in each case none of the information collected can be used to personally identify you.

You can configure your browser to accept or, reject all cookies, or notify you when a cookie is sent. (Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.)

If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites then you may not be able to gain access to all of the content and facilities in our website.

### **Dealing with First Index Online**

If you visit First Index' website to browse, read or download information, our system will log these movements. These web site logs are not personally identifiable and First Index makes no attempt to identify persons who browse the site.

Your account information is password protected and we recommend you do not disclose your password to anyone. We cannot guarantee or accept responsibility for the privacy practices or the content of web sites to which we provide links.



### **Other Important Information**

We may amend our Privacy Policy from time to time. We will notify you of any changes to our Privacy Policy that requires your consent before implementation. If you have a complaint or want more information about how First Index is managing your personal information, please contact us.

First Index t/a AGM Markets Pty Ltd  
Level 1, 189 Balaclava Rd  
Caulfield North, VIC 3161, Australia  
Tel: +61 3 9068 8900  
Email: [support@firstindex.com](mailto:support@firstindex.com)