

TRADINGVIBE PTY LTD

Privacy Policy

ACN 686 041 903 | ABN 17 686 041 903 | AFSL 569224

Version 1 - 15 July 2026

Important information

Please read this document carefully and retain a copy for your records.

TradingVibe Pty Ltd (ACN 686 041 903) (AFSL 569224), trading as TradingVibe ("we", "us", "our" or "TradingVibe"), is subject to the Privacy Act 1988 (Cth) and the Australian Privacy Principles (Privacy Law). We value transparency and privacy and are committed to protecting the personal information about you that we collect, hold, use and disclose in accordance with the Privacy Law and this website privacy policy (Privacy Policy). Where applicable, TradingVibe may also collect personal information for the purposes of complying with other legislation, such as the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).

By providing us with, or authorising us to collect, your personal information, you acknowledge that you have read and understood this Privacy Policy and consent to the collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us.

1. Information we collect about you

- (a) Non-Personally Identifiable Information: the first type of information is non-personally identifiable data and statistical information. Non-personally identifiable data that is being gathered consists of technical information and behavioural information that does not pertain to a specific individual (Non-Personal Information). This includes your device type, browser type and version, IP data, screen size and resolution, language and other technical data. While it is not specifically personally identifiable, it may be reverse engineered to be identifiable and, therefore, is considered personal information.
- (b) Personally Identifiable Information: the other type of information we collect is individually identifiable information. This information identifies an individual or is of a private and/or sensitive nature, such as your contact information and financial data, including:
 - (i) your contact details, which include your email address, phone number, full name, date of birth, gender, residential address, and postal address;
 - (ii) your financial data, including your bank details, tax identification number, income, net assets or wealth verification statements, and your transaction history; and
 - (iii) where relevant to our services, documents and data provided as part of any identity verification process, including a photocopy of your government issued ID, passport or driver's licence, occupation and place of work, proof of address, and other information such as your source of wealth and source of funds.

How do we collect your personal information

We collect your personal information in the following ways:

- (a) When you visit our website: when you visit our website, we collect information sent to us by your computer, mobile phone, or other access device. This information may include your IP address, browser type, operating system, and other device characteristics or identifiers.
- (b) When you enquire about or register for our services: when you enquire about or register for our courses or other services, we collect information such as your name, email address, phone number, date of birth, residential address, and postal address. Where relevant to a financial service we provide, we may also collect additional information, such as identification documents, to verify your identity or address.

- (c) When you use our services: when you use our services, we collect information about your activity on our website and, where applicable, your transactions. This may include the date and time of your interactions and, for dealing services, details of the relevant transaction. We may also collect information about your computer or other access device for fraud prevention purposes.
- (d) To protect against fraud and misuse: we may collect information about your use and interaction with our website to help protect against fraud and misuse of your personal information. For example, we may evaluate your computer, mobile phone, or other access device to identify any malicious software or activity that may affect the availability of our services.
- (e) Other ways: we may also collect additional information from or about you in other ways, such as through interactions with our customer support team.

2. Website cookies and the use of personal information

We make use of "cookies" technology to improve the functionality of our website. A cookie is a small string of information that a website transfers to your browser for identification purposes.

If you provide personal information via our website (for example, by completing an online form), cookies may be used to match your web browser to that personal information. This may be done for the following purposes:

- (a) to monitor your usage of, and browsing behaviour on, our website;
- (b) to identify information or services that may be of interest to you (based on your usage of, and browsing behaviour on, our website); and
- (c) related marketing purposes.

Internet browsers typically permit settings to be adjusted to manage or block cookies. However, if you disable the cookies feature, you may not be able to access all the functionality of our website.

3. What happens if you choose not to provide the information?

You do not have to give us your personal information. However, if you choose not to, we may be unable to provide you with all our courses, products or services.

4. How we use your personal information

We may collect, hold, use and disclose your personal information for the purposes of:

- (a) Providing you with the services you have requested: we use your personal information to provide you with the services you have requested, such as enrolling you in a course, providing general advice, arranging a dealing service, or responding to your enquiry;
- (b) Communicating with you about your account and transactions: we use your personal information to communicate with you about your account and any transactions, such as sending you confirmations and service updates;

- (c) Protecting our users and the website from fraud and other illegal activities: we use your personal information to protect our users and the website from fraud and other illegal activities, such as screening for suspicious activity and enforcing our terms of use;
- (d) Improving our service and the website: we use your personal information to improve our service and the website, such as developing new features, fixing issues, and measuring the effectiveness of our marketing campaigns;
- (e) Delivering direct marketing, service update notices, and promotional offers based on your communication preferences: we may use your personal information to deliver direct marketing, service update notices, and promotional offers to you. We will only do this where you have opted in to receive these communications; and
- (f) Complying with applicable laws and regulations: we may use your personal information to comply with applicable laws and regulations, including those relating to financial services, and, where applicable to our operations, anti-money laundering and know-your-customer requirements.

5. Sharing personal information with third parties

Your personal information may be disclosed to third parties for the purposes described in this Privacy Policy or described in any other specific and additional privacy provisions that apply to certain courses, products or services provided by us. We may disclose your personal information to the following third parties (as distinct from the person to whom you have provided your personal information):

- (a) any product issuer, executing broker, platform provider or other financial services provider involved in providing a service to you, where relevant to a dealing service we arrange on your behalf;
- (b) our partners for the purpose of assisting us with identity verification and providing any further support needed to use our services;
- (c) any person acting on your behalf, including your solicitor, accountant, executor, administrator, trustee or guardian;
- (d) government agencies, law enforcement or regulatory agencies and bodies or other third parties as required by, and in accordance with, applicable law and regulations; and
- (e) any other third party with your consent or where authorised or required by law.

6. Location of your personal information

The personal information collected from you, as detailed in this Privacy Policy, may be transferred to and stored at servers that may be located in countries outside of Australia and in countries according to our third-party providers' standard contractual obligations.

It may also be processed by us and our suppliers, service providers or partners' staff operating outside Australia.

We are committed to protecting your personal information and will take reasonable steps to ensure that your personal information is processed and stored securely and in accordance with the Privacy Law, as detailed in this Privacy Policy. Such steps include putting in place data transfer agreements or ensuring our third-party service providers comply with our data transfer

protection measures.

By submitting your personal information through our website, you acknowledge, and agree, in a jurisdiction where such consent is required, to such transfer, storing and/or processing of personal information.

7. You can access, edit, update or delete your personal information

You can access, edit, update or delete your account or personal information we have collected at any time by accessing your account settings (where applicable) or by contacting us via email at privacy@tradingvibe.com.au. We will respond to your request within a reasonable period, but no later than 30 days.

8. Circumstances in which we may not be able to accommodate your request

Please note that, notwithstanding the foregoing, there may be circumstances in which we are unable to accommodate a request to edit, update, access, or delete an account profile or personal information. This includes but is not limited to:

- (a) any basis on which such a request can be denied under applicable law;
- (b) where we need to retain the information to comply with federal, state, or local laws or for accounting or tax purposes;
- (c) where we need to comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- (d) where we need to cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state or local laws;
- (e) where we need to retain information to exercise or defend legal claims;
- (f) where the information contains legal privilege or proprietary information of another party; or
- (g) where complying with the request would compromise others' privacy or other legitimate rights.

If we determine that we cannot respond to a request in a particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, we will take commercially reasonable steps to verify your identity before responding to any request under this clause, including complying with any applicable legal requirement for verifying your identity.

To the extent permitted by applicable law, we reserve the right to charge you a reasonable fee for handling and processing your requests to access your personal information, where applicable. If we choose to charge a fee, we will provide you with a written estimate of the fee before proceeding.

9. How we hold and secure your personal information

We take reasonable steps to preserve the security of the personal information we collect. Your personal information is held in an environment with reasonable security measures consisting of physical measures, electronic measures, or a combination of both.

We have implemented security procedures, controls, and protocols across our physical premises and electronic environments to minimise the risk of interference, loss, misuse, unauthorised access, modification, or disclosure of personal information.

However, due to inherent risks in the transmission of information over the internet or other methods of electronic storage, we cannot guarantee that unauthorised access or use will never occur.

We will comply with applicable law in the event of any breach of the security, confidentiality, or integrity of your personal information and will inform you of such breach if required by applicable law.

To the extent that we implement the required security measures under applicable law, we shall not be responsible or liable for unauthorised access, hacking, or other security intrusions, or the failure to store, or the theft, deletion, corruption, destruction, damage, or loss of, any data or information included in your personal information.

10. Data retention

We will retain your personal information for as long as we believe it is accurate and can be relied upon. Personal information that is no longer required for the purpose for which it was initially collected will be deleted unless we have a valid justification to retain it that is permitted under applicable law, such as to resolve disputes or comply with our legal obligations.

11. Data breach

Should any unforeseeable event occur which results in the loss, or unauthorised access or disclosure, of your personal information that is likely to result in serious harm to you, we will investigate the matter and notify you and the Office of the Australian Information Commissioner (OAIC) as soon as reasonably practicable, in accordance with our obligations under the Privacy Law.

12. Updating our privacy statement

We may update this Privacy Policy from time to time to reflect changes in how we handle personal information and to reflect any changes to the Privacy Law. If we make changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on our website with a notice that the Privacy Policy has been updated.

If required by law, or where there are significant revisions to our processing of your personal information, we will also notify you directly of the changes, such as via email or another manner through the website. Any such modifications to this Privacy Policy will be effective on our posting the modified version (or as otherwise indicated at the time of posting) and, in all cases, your continued use of the website after the effective date of the modified Privacy Policy indicates your acceptance of that modified Privacy Policy.

13. Complaints and further information

If you have any concerns about how we handle your personal information, believe we have breached the Privacy Law, wish to make a complaint, or need further information, please contact us via email at compliance@tradingvibe.com.au. You will need to provide us with sufficient detail regarding your complaint and any supporting evidence. We will investigate the issue and determine the steps to be taken to resolve the complaint. We will notify you in writing if we require any additional information, and also of the outcome of our investigation.

If you are not satisfied with our response to your complaint, or your concerns are not satisfactorily resolved, you may contact the Australian Financial Complaints Authority (AFCA) or the OAIC for further review.

Australian Financial Complaints Authority

TradingVibe Pty Ltd is a member of AFCA, membership number 120924

GPO Box 3, Melbourne VIC 3001

Tel: 1800 931 678

Email: info@afca.org.au

Website: www.afca.org.au

Office of the Australian Information Commissioner

By phone: 1300 363 992

In writing: GPO Box 5218, Sydney NSW 2001