

# Wholesale Broking **Solutions.**

## Privacy Policy

*Handling of Personal Information in accordance  
with the Australian Privacy Principles*

Wholesale Broking Solutions Pty Ltd | ABN 41 643 105 999 | CAR 001282970  
Authorised Representative of BR Securities Australia Pty Ltd | AFSL 456663  
Version: May 2026

### About This Policy

Wholesale Broking Solutions Pty Ltd (ABN 41 643 105 999) (“WBS”, “we”, “us”, “our”) is an Authorised Representative (CAR 001282970) of BR Securities Australia Pty Ltd (ABN 92 168 734 530, AFSL 456663). WBS is committed to protecting the privacy of your personal information in accordance with the Privacy Act 1988 (Cth) (as amended by the Privacy and Other Legislation Amendment Act 2024) and the 13 Australian Privacy Principles (APPs). This policy describes how we collect, hold, use and disclose personal information, and how you can access, correct or raise concerns about that information.

## 1. What is Personal Information

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“Personal information” means 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 it is recorded in material form or not (Privacy Act 1988 (Cth), s 6(1)).

Sensitive information includes information such as health information, biometric information, and other categories defined under the Privacy Act. Certain government identifiers (such as Tax File Numbers) are subject to separate and additional protections under applicable law.

## 2. Information We Collect

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### Client and account information

To open and operate your account and comply with our legal obligations, we collect: full legal name, date of birth, residential and postal address, and contact details (email, telephone); government-issued identification (passport, drivers licence, national identity document) and associated numbers; Tax File Number (TFN) and tax residency information where required for reporting obligations; financial information including bank account details, Holder Identification Number (HIN), Security Reference Number (SRN), net assets, income, and investment experience; entity structure information for corporate, trust, partnership, or SMSF clients (including beneficial ownership details and director/trustee identification); and trading activity, account balances, transaction history, and position data.

### AML/CTF identification information

As a reporting entity under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act), WBS is required by law to collect and verify certain personal information to conduct customer identification and due diligence. This includes copies of identity documents, proof of address, source of funds, and politically exposed person (PEP) status. We collect this information to comply with our legal obligations under the AML/CTF Act and AUSTRAC requirements. Some AML/CTF obligations limit what we can disclose about why information has been collected (tipping-off restrictions apply).

### Usage and technical information

When you visit our website, use our trading platform, or contact us electronically, we may collect technical information including IP address, browser type, device identifiers, pages visited, and session data. This information is used to operate our services securely and to improve platform performance.

### How we collect information

We collect personal information directly from you when you: apply to open an account; use our trading platform, website, or mobile application; communicate with us by telephone, email, or live chat; complete surveys or provide feedback; or submit documentation for KYC or AML/CTF purposes. We may also collect information from third parties, including identity verification providers, credit reporting bodies, Prime Brokers, clearing participants, and publicly available sources, where it is not reasonable or practicable to collect directly from you.

### 3. How We Use Your Information

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We use personal information for the following purposes:

- (a) Providing services - to open, operate, and manage your account; execute orders; provide clearing, custody, and financing services; and perform any other services you have requested.
- (b) Legal and regulatory compliance - to comply with the AML/CTF Act 2006, the Corporations Act 2001, ASIC rules and market integrity rules, AUSTRAC obligations, tax reporting requirements (including FATCA and CRS), and all other applicable laws and regulations.
- (c) Risk management - to assess and manage credit, margin, counterparty, and operational risk in connection with your account and transactions.
- (d) Identity verification and fraud prevention - to verify your identity, prevent financial crime, and detect and investigate suspected fraudulent or unlawful activity.
- (e) Communications - to contact you about your account, send trade confirmations, margin notifications, account statements, and material changes to our terms or this policy.
- (f) Marketing - with your consent, or where otherwise permitted under the Privacy Act 1988 (Cth) and the Spam Act 2003 (Cth), to provide information about our products and services that may be relevant to you. You may opt out of marketing communications at any time (see Section 11).
- (g) Platform and service improvement - to analyse usage patterns, improve our systems, and develop new services. We use aggregated, de-identified data for this purpose where possible.
- (h) Automated decision-making - some decisions affecting your account (including margin calls, position liquidations, and risk assessments) are made in whole or in part by automated systems operated by WBS and its Prime Broker. You may request information about how automated decisions affecting you are made by contacting our Privacy Officer.

### 4. Disclosure to Third Parties

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WBS may disclose personal information to the following categories of recipients:

#### **Prime Broker and clearing participants**

We disclose necessary account and transaction information to our Prime Broker and clearing participants to execute, clear, settle, transactions and provide custody services on your behalf. The Prime Broker may further disclose information to exchanges, central counterparties, and other market infrastructure as required for settlement.

#### **Regulatory and government authorities**

We are required by law to disclose personal information to: the Australian Securities and Investments Commission (ASIC); the Australian Transaction Reports and Analysis Centre (AUSTRAC); the Australian Taxation Office (ATO) (including under FATCA and CRS reporting obligations); the Office of the Australian Information Commissioner (OAIC); courts and law enforcement authorities; and other regulatory bodies as required by applicable law.

#### **Technology and service providers**

We use third-party service providers to operate our business, including: identity verification and KYC providers; CRM and client relationship platforms (including Pipedrive, databases of which are stored in Frankfurt, Germany and the United States - see Section 8); trading platform infrastructure providers; cloud hosting and IT services; legal, audit, and compliance advisers; and communications and document management providers. All service providers are engaged under contractual arrangements that require them to handle personal information in accordance with the APPs and applicable privacy laws.

#### **BR Securities Australia Pty Ltd**

As WBS's AFSL holder, BR Securities Australia Pty Ltd may receive information about WBS clients for compliance, supervisory, and licensing purposes.

WBS does not sell, rent, or trade personal information to third parties for commercial purposes.

## 5. Sensitive Information and Government Identifiers

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### Sensitive information

Sensitive information includes information such as health information, biometric information, and other categories defined under the Privacy Act. Certain government identifiers (such as Tax File Numbers) are subject to separate and additional protections. Sensitive information is subject to enhanced protections under APP 3.3 and will not be used for secondary purposes (including marketing) without your express consent.

### Tax File Numbers

WBS may collect your Tax File Number (TFN) where required for tax reporting obligations under Australian law (including FATCA and CRS). TFNs are handled in accordance with the Tax File Number Guidelines issued under the Privacy Act 1988 (Cth) and will only be used and disclosed as permitted by those guidelines. You are not legally required to provide your TFN to WBS, but failure to do so may result in withholding tax being deducted from certain payments at the highest marginal rate.

### Biometric and identity document data

Where WBS or its identity verification providers use biometric matching or facial recognition technology to verify your identity for KYC purposes, this is conducted in accordance with the APPs and applicable state and territory privacy legislation. Copies of identity documents are retained only for the period required by the AML/CTF Act (generally 7 years following the end of the business relationship) and are then securely destroyed.

## 6. Data Security

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WBS takes reasonable technical and organisational measures to protect personal information from misuse, interference, loss, and unauthorised access, modification, or disclosure. These measures include:

- (a) Encrypted data transmission using TLS protocols for all data in transit between clients and WBS's systems.
- (b) Encrypted data storage for personal and financial information held on WBS's systems and those of its service providers.
- (c) Multi-factor authentication and role-based access controls restricting access to personal information to authorised personnel only.
- (d) Regular security assessments and monitoring of systems and third-party service providers.
- (e) Staff training on privacy obligations and information security practices.
- (f) Contractual requirements for all third-party service providers to implement appropriate security measures.

Notwithstanding these measures, no data transmission over the internet or electronic storage system can be guaranteed to be completely secure. If you suspect a security incident affecting your personal information, please contact our Privacy Officer immediately.

## 7. Notifiable Data Breaches

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WBS is subject to the Notifiable Data Breaches (NDB) scheme under Part IIIC of the Privacy Act 1988 (Cth). If WBS becomes aware of a data breach that is likely to result in serious harm to any affected individuals, WBS will:

- (a) Conduct a prompt and reasonable assessment of whether the breach constitutes an "eligible data breach" for the purposes of the NDB scheme.
- (b) Notify the Office of the Australian Information Commissioner (OAIC) as soon as practicable after forming the view that an eligible data breach has occurred.
- (c) Notify affected individuals directly where practicable, or publish a statement on our website if direct notification is not practicable.
- (d) Provide affected individuals with information about the breach, the type of information involved, and the steps WBS recommends they take in response.

If you believe your personal information held by WBS may have been involved in a data breach, please contact our Privacy Officer at [info@wholesalebroking.com](mailto:info@wholesalebroking.com) as soon as possible.

## 8. Overseas Disclosure and Cross-Border Data Transfers

Some of the personal information WBS holds is stored or processed outside Australia. Under APP 8, WBS remains accountable for the handling of personal information by overseas recipients and takes reasonable steps to ensure that such recipients do not breach the APPs in relation to that information.

By providing your personal information, you consent to this overseas disclosure.

### Countries and systems

The following are the primary overseas jurisdictions to which WBS currently discloses or transfers personal information:

Germany (European Union) and United States - Client relationship and communications data is stored in Pipedrive CRM databases hosted in Frankfurt, Germany (for EU/EMEA data) and the United States (for all other regions). Both jurisdictions are subject to data processing agreements requiring compliance with the EU General Data Protection Regulation (GDPR) and equivalent standards.

Prime Broker jurisdictions - Transaction and account data may be processed in the jurisdictions where WBS's Prime Broker and its affiliates operate, including the United Kingdom, United States, and other financial centres. These transfers occur under contractual arrangements requiring equivalent privacy protections.

### Safeguards

WBS ensures that all overseas recipients are bound by: (a) contractual data processing agreements requiring APP-equivalent protections; (b) applicable data protection laws in the recipient jurisdiction (including the GDPR for EU-based recipients, which imposes standards at least as protective as the APPs); or (c) other mechanisms recognised under Australian privacy law. You may contact our Privacy Officer to obtain further information about the safeguards applicable to specific overseas transfers.

## 9. Data Retention and Destruction

WBS retains personal information for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable law and regulation. The following retention periods apply:

Category of information	Retention period	Legal basis
Client identity and KYC documents	7 years from end of business relationship	AML/CTF Act 2006 (Cth), s 106
Transaction and trade records	7 years from date of transaction	ASIC record-keeping obligations; Corporations Act 2001 (Cth)
Account statements and financial records	7 years from date of record	Corporations Act 2001; ATO requirements
AML/CTF screening and monitoring records	7 years from end of business relationship	AML/CTF Act 2006 (Cth)
Dispute and complaint records	7 years from resolution of complaint	ASIC RG 271; internal policy
Marketing and communications records	2 years from last contact, or earlier on opt-out	Spam Act 2003; APP 11.2
Website and platform usage logs	2 years from date of collection	Cyber security and operational requirements under applicable law

When personal information is no longer required and retention is not mandated by law, WBS will take reasonable steps to destroy or permanently de-identify that information in a secure manner. Destruction of physical documents is conducted using cross-cut shredding or secure document destruction services. Electronic records are securely deleted or de-identified in accordance with WBS's information security procedures.

## 10. Cookies and Online Tracking

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WBS's website and trading platform use cookies and similar tracking technologies to operate, secure, and improve our services. The following categories of cookies may be used:

### Strictly necessary cookies

These cookies are essential for the operation of the website and platform - including login sessions, security features, and access to account functions. They cannot be disabled without affecting the operation of the service.

### Performance and analytics cookies

These cookies collect aggregated, anonymised information about how visitors use our website, including pages visited and error messages, to help us improve performance. We may use third-party analytics tools for this purpose. The information collected does not identify individual users.

### Functional cookies

These cookies allow the website to remember preferences such as language settings and login details. Disabling them may affect your experience.

### Marketing cookies

Where WBS uses third-party advertising or remarketing tools, marketing cookies may be placed to show you relevant content based on your browsing behaviour. You can opt out of marketing cookies through your browser settings or by contacting our Privacy Officer. WBS does not sell cookie data to third parties.

Most web browsers allow you to control cookies through browser settings. Restricting cookies may limit your ability to use certain features of our website or platform. For more information about managing cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

Where required, we will obtain your consent before placing non-essential cookies.

## 11. Marketing and Direct Communications

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WBS may use your personal information to send you information about our products, services, and market updates where you have given your consent or where otherwise permitted under the Privacy Act 1988 (Cth) and the Spam Act 2003 (Cth).

All commercial electronic messages (emails, SMS) sent by WBS comply with the Spam Act 2003 (Cth) and include a clear and functional unsubscribe mechanism. You may opt out of marketing communications at any time by: clicking the unsubscribe link in any marketing email; emailing [info@wholesalebroking.com](mailto:info@wholesalebroking.com); or contacting our Privacy Officer using the details in Section 14.

Opting out of marketing communications will not affect your receipt of account-related communications (such as trade confirmations, margin notices, and account statements), which are necessary to manage your account.

WBS will not use sensitive information for direct marketing without your explicit consent.

## 12. Accessing and Correcting Your Information

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### Right of access (APP 12)

You have the right to request access to the personal information WBS holds about you. To make an access request, please contact our Privacy Officer in writing (see Section 14). WBS will respond to your request within 30 days.

WBS may charge a reasonable fee to cover the administrative cost of processing an access request. We will advise you of any applicable fee before processing your request. We will not charge a fee for making the request itself, only for providing access.

WBS may refuse an access request in limited circumstances, including where: providing access would unreasonably impact the privacy of another individual; the request is frivolous or vexatious; the information relates to anticipated legal proceedings; or access is otherwise denied under the APPs or applicable law. If we

refuse your request, we will provide written reasons for the refusal and advise you of any applicable complaint mechanisms.

### **Right of correction (APP 13)**

If you believe that personal information WBS holds about you is inaccurate, out of date, incomplete, irrelevant, or misleading, you may request that we correct it. There is no fee for a correction request. WBS will respond within 30 days and, if we agree a correction is warranted, will take reasonable steps to correct the information and notify any third parties to whom the inaccurate information was previously disclosed (where relevant).

If WBS does not agree to make the requested correction, we will notify you in writing with our reasons. You may request that we attach a statement of your view to the relevant record.

## **13. Privacy Complaints and the OAIC**

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If you believe WBS has interfered with your privacy or breached the APPs, you may lodge a complaint with our Privacy Officer (see Section 14). WBS will acknowledge your complaint promptly (generally within 1 business day) and provide a written response within 30 days.

If you are dissatisfied with WBS's response to your complaint, or if WBS does not respond within 30 days, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC):

Office of the Australian Information Commissioner | [oaic.gov.au](http://oaic.gov.au) | 1 300 363 992

Please note that since June 2025, the Privacy and Other Legislation Amendment Act 2024 has provided individuals with a direct right to bring court proceedings against entities for serious invasions of privacy, without first going through the OAIC. You may wish to seek independent legal advice about your options.

## **14. Contacting Our Privacy Officer**

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For all privacy-related inquiries, access and correction requests, complaints, or questions about this policy, please contact:

### **Privacy Officer - Contact Details**

**Privacy Officer**

**Wholesale Broking Solutions Pty Ltd**

**ABN:** 41 643 105 999 | **CAR** 001282970

**Email:** [info@wholesalebroking.com](mailto:info@wholesalebroking.com)

**Mail:** Privacy Officer, Wholesale Broking Solutions, PO Box 256, Flinders Lane, VIC, 8009

**Response time:** 30 days from receipt of your request

## **15. Updates to This Policy**

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WBS reviews and updates this Privacy Policy periodically to reflect changes in applicable law, our services, and our information handling practices. Where changes are material, we will notify clients by email or by posting a notice on our website. We encourage you to review this policy regularly. The most current version is available at [www.wholesalebroking.com/privacy](http://www.wholesalebroking.com/privacy).

This policy supersedes all prior versions of the WBS Privacy Policy, including the version dated November 2024.

## Document Version History

Category of information	Retention period	Legal basis
v1.0 (November 2024)	Initial version	Referenced National Privacy Principles (now superseded)
v2.0 (May 2026)	Full rewrite	Updated to reference 13 Australian Privacy Principles; added NDB scheme, AML/CTF data handling, automated decision-making disclosure, retention schedule, overseas transfer safeguards, sensitive information provisions, and 2024 Privacy Act reform disclosures