



Privacy and Cookie Policy

Nise Invest Pty Ltd

Last updated: June 2026



1. Introduction

This Privacy & Cookie Policy is issued by **Nise Invest Pty Ltd** (ACN 690 010 809), **trading as NISE INVEST**.

For the purposes of this Policy, **Nise Invest Pty Ltd will be referred to as “NISE INVEST”, “we”, “our” or “us”**.

This Policy outlines how we collect, use, disclose, and protect personal information in compliance with the **Australian Privacy Act 1988 (Cth)**, Australian Privacy Principles (**APP**) and other relevant privacy regulations, including the **General Data Protection Regulation (GDPR)** where applicable.

NISE INVEST is committed to safeguarding your personal information and handling it with transparency, care, and integrity.

For clarity, the following definitions apply:

- **Credit Information:** Any personal data, excluding sensitive information, that pertains to an individual's creditworthiness or financial history, as defined under privacy legislation.
- **Disclosure:** The act of providing or sharing personal data with parties external to NISE INVEST.
- **Individual:** Any person whose personal information is gathered, stored, used, or disclosed by NISE INVEST.
- **Personal Information:** Any data or opinion related to an identifiable person, whether recorded in material form or not.
- **Privacy Officer:** The designated contact person within NISE INVEST responsible for inquiries or complaints about our

handling of personal information.

- **Sensitive Information:** A category of personal data that includes details about racial or ethnic background, religious or political beliefs, trade union membership, sexual orientation, criminal history, or health records.
- **Use of Information:** Refers to the internal processing, handling, or application of personal data within NISE INVEST.

NISE INVEST upholds a strict commitment to safeguarding client information and complying with legal requirements concerning data security and privacy.

2. What this policy deals with

This Policy deals with:

- (a) The kinds of personal information that we collect and hold
- (b) How we collect and hold personal information
- (c) The purposes for which we collect, hold, use and disclose personal information
- (d) How you may access personal information that we hold about you and seek the correction of such information
- (e) How to complain about a breach of the APP and how we will deal with such a complaint
- (f) If we disclose personal information to overseas recipients—the countries in which such recipients are likely to be located if it is practicable to specify those countries in the Policy.

3. Collection and Storage of Personal Information



NISE INVEST collects and stores personal information that is relevant to providing financial services, account management, and regulatory compliance. The types of personal data we may collect include, but are not limited to:

- Full name and identity details
- Residential and mailing addresses
- Contact information such as email and phone number
- Date of birth
- Employment details, including job title and employer information
- Banking details, including financial account numbers and payment information
- Trading history and transaction records
- Identification documents (e.g., passport, driver's license, or utility bills) required under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth)
- Credit history or financial standing (only where explicitly authorized by the individual)
- Any other data deemed necessary to facilitate the provision of our services

We collect this information to verify identities, fulfill regulatory requirements, and ensure compliance with Australian Financial Services License (AFSL) obligations.

4. Collection of Personal Information

At NISE INVEST, we primarily collect personal information directly from individuals. This occurs when a person interacts with us by submitting an online application, visiting our website, communicating with our support team, or engaging in any other direct correspondence. Information may also be gathered from third parties, such as financial service providers, or credit reporting agencies, when necessary for



regulatory or operational purposes. If we receive personal data from a third party, we will take reasonable steps to ensure that the individual is informed about the collection and its intended use.

In certain cases, we may obtain credit-related information from credit reporting bodies to assess an individual's financial standing before approving an account application. However, we will only collect this type of information with explicit authorization from the individual.

We do not collect sensitive information unless the individual has given consent, or unless an exemption under privacy laws applies. This includes situations where collection is legally mandated or required for investigating suspected fraud, unlawful conduct, or compliance violations.

Failure to provide the requested personal information may prevent us from offering financial services, opening a trading account, or fulfilling regulatory obligations.

Additionally, NISE INVEST does not allow anonymous dealings or transactions under pseudonyms, as we are required to verify all clients under Australian Anti-Money Laundering (**AML**) and Counter-Terrorism Financing (**CTF**) laws. This ensures compliance with financial crime prevention regulations and facilitates secure trading operations.

For clients whose data is collected under the General Data Protection Regulation (GDPR) framework, we will also ensure they are informed about:

- Whether providing personal information is contractually or legally required, or if consent is necessary, along with the right to withdraw consent at any time.
- The right to file a complaint with the appropriate data protection authority in their jurisdiction.



- The use of automated decision-making processes, including profiling, and any potential implications of such automated assessments.

NISE INVEST remains committed to handling personal information responsibly and in compliance with both Australian and international privacy standards.

5. Unsolicited Personal Information

At NISE INVEST, we may, at times, receive personal information that was not directly requested or solicited from individuals. In such cases, our employees are required to report any unsolicited personal information to the Privacy Officer for review.

We must determine whether we could have collected the information under APP 3 (collection of solicited personal information) if we had solicited the information and we may use or disclose the personal information to make this determination.

Then, if we determine that we could not have collected the personal information and the information is not contained in a Commonwealth record, we must, as soon as practicable, but only if it is lawful and reasonable to do so, destroy the information or ensure that the information is de-identified. If, however, this does not apply in relation to the personal information, then APP 5 to 13 apply in relation to the information as if we had collected the information by solicitation. If the information aligns with our data collection practices and is necessary for compliance, regulatory obligations or service provision, it will be handled in accordance with our privacy framework.

6. Individuals Whose Personal Information We Collect



NISE INVEST collects personal information from a broad range of individuals who interact with our business. This includes clients who engage in trading or investment services with us, as well as potential clients who express interest in our offerings.

We also collect personal information from affiliates, and money managers who collaborate with us in a professional capacity, along with service providers and suppliers that support our operations. In addition, information is gathered from prospective employees, current employees, and contractors who work with NISE INVEST, ensuring compliance with employment regulations and internal policies.

In specific instances, we may need to collect data on individuals beyond our direct clients and business partners. This includes trustees, legal partnership partners, company directors, and officeholders, particularly when they act on behalf of entities engaging with us. Additionally, we may collect information from agents nominated by individuals and third parties who interact with NISE INVEST on a one-time basis for financial or regulatory transactions.

NISE INVEST remains committed to ensuring that all personal information is collected lawfully and managed responsibly, in line with our privacy obligations and regulatory commitments.

7. Purposes for Collecting and Retaining Personal Information

At NISE INVEST, the collection and retention of personal information from individuals is conducted for specific, well-defined purposes crucial to providing our services effectively. Primarily, we gather personal data to evaluate and process applications from individuals who wish to open and maintain trading accounts with us. The personal



information allows us to establish, manage, and administer these accounts.

Additionally, we utilise personal information to regularly provide individuals with targeted updates on our range of services, insights into current market conditions, and notifications of special promotional offerings. We consider this information critical not only for customer engagement but also for enhancing the value provided to our clients.

Protecting our business operations and ensuring the safety of our clientele from fraudulent, deceptive, or otherwise unlawful activities is another core reason behind our collection of personal data. We carefully monitor account activities to detect and prevent any suspicious or unauthorized transactions, which safeguards both our operations and our clients' interests.

Personal information is also crucial to carry out routine administrative and management tasks that enable NISE INVEST to maintain operational efficiency, handle any complaints or concerns raised by clients, and effectively address any legal proceedings involving our company.

Finally, we collect personal information to ensure strict compliance with all relevant regulatory requirements and legal obligations to which NISE INVEST is subject. This comprehensive approach to data management ultimately helps us to continuously refine and improve our services, ensuring a superior customer experience and fostering the overall growth and success of our business.

8. Use and Disclosure of Personal Information



NISE INVEST may use and disclose personal information for the primary purposes outlined in the previous section. Additionally, we may use this information for related secondary purposes that are reasonably expected and for any other purposes authorized by applicable privacy laws.

The use of personal data allows us to efficiently plan, manage, and administer contractual business relationships with individuals or third parties associated with them. This includes providing necessary support services, responding to requests, and fulfilling obligations related to our financial offerings. A significant part of our operations involves ensuring the security of our products, services, and digital platforms. We actively monitor and take necessary measures to detect and prevent security threats, fraudulent activities, and malicious attempts that could compromise our systems or client data.

Compliance with legal and regulatory obligations is another key reason we may use personal information. This includes maintaining records for taxation and financial reporting, issuing mandatory notices, and fulfilling compliance screening requirements. In some cases, this requires conducting automated verification checks against government-sanctioned lists or confirming an individual's identity when necessary. Furthermore, information may be recorded to support regulatory investigations or to ensure adherence to legal frameworks, such as antitrust, export control, trade sanctions, or anti-money laundering regulations.

Personal data may also be used in resolving disputes, enforcing contractual agreements, and defending against or initiating legal claims when required. In instances where an individual has expressly granted their consent or where permitted by law, we may use their information to facilitate communication through approved channels. This allows us to keep clients informed about company updates, service enhancements, promotional offers, and other developments, including marketing-related content and newsletters.



Sensitive information is handled with the utmost care and is only used or disclosed for the purpose for which it was originally provided or a directly related secondary purpose. If additional usage is required, we ensure that appropriate consent is obtained unless an exemption applies under the law.

To provide a seamless and efficient service, we sometimes engage external entities to carry out specific functions on our behalf. In such instances, we enforce strict guidelines that prohibit these third-party service providers from using any collected personal data for unrelated purposes, including direct marketing of their own products or services.

Additionally, NISE INVEST takes proactive steps to either destroy or de-identify sensitive information whenever it is no longer required. We continuously assess our data retention practices to ensure that personal information is not held indefinitely and is disposed of responsibly when it is no longer relevant to our business operations.

9. Disclosure of Personal Information

NISE INVEST may disclose personal information to various entities as part of our business operations, regulatory obligations, and service agreements. This includes sharing information with related entities within our corporate group, third-party service providers, and regulatory bodies when necessary.

We may disclose personal information to agents, contractors, or service providers engaged to assist in the execution of our business activities. This includes but is not limited to legal advisors, accountants, debt collection agencies, and marketing firms. Additionally, information may be shared with organizations that facilitate payment processing, such as financial institutions, banks, and payment merchants.



In cases where there is a corporate transaction, such as the transfer or sale of assets, personal information may be disclosed to the acquiring entity as part of the business handover process. Similarly, we may disclose data to liquidity providers and trade repositories as part of market operations. Regulatory bodies, law enforcement agencies, and courts may also require access to personal information when mandated by legal obligations.

For individuals using the services of a co-account holder, or an authorized agent, their personal information may be disclosed to such representatives. Furthermore, where an individual has explicitly authorized disclosure to another party, or where disclosure is legally mandated, we will comply with such requests.

When processing personal information under the GDPR, NISE INVEST ensures that such disclosure aligns with the legal bases outlined in Article 6 of the GDPR. Disclosures may be necessary for fulfilling contractual obligations, protecting vital interests, or pursuing legitimate business interests that do not override an individual's rights and freedoms. Additionally, legal claims, compliance with regulatory requirements, and explicit consent from individuals serve as further grounds for processing and sharing personal information.

Generally, providing personal data to us is voluntary, and individuals may choose not to consent or share their data without immediate repercussions. However, in cases where certain personal data is essential to process financial transactions, grant access to specific services, or comply with mandatory regulations, withholding such information may prevent NISE INVEST from fulfilling service requests or legal obligations.



10. Sending Personal Information Overseas

NISE INVEST may disclose personal information to third-party service providers, regulatory authorities, and other entities necessary to facilitate trading operations, regulatory compliance, and business support functions. Given the global nature of financial markets, some of these entities may be located in jurisdictions outside Australia. While we strive for transparency regarding how personal information is handled, it may not always be feasible to specify the exact countries where data may be processed. However, NISE INVEST takes all reasonable steps to ensure that any overseas recipients comply with privacy standards equivalent to the Australian Privacy Act and other applicable data protection regulations.

Additionally, we use cloud data storage services, and some of the servers that store individuals' personal information may be located in the United States of America. In the future, NISE INVEST may also share personal information with other overseas entities, and where possible, the specific countries involved will be outlined in this Privacy Policy. However, if it is impracticable to do so, NISE INVEST will ensure that all disclosures adhere to the highest data protection standards.

NISE INVEST will not transmit personal information to any overseas recipients unless specific conditions are met. We ensure that reasonable steps have been taken to prevent the recipient from violating data protection laws, that the recipient is bound by an information privacy framework equivalent to the Australian Privacy Act, or that the individual has explicitly consented to the disclosure.

11. Management of Personal Information



NISE INVEST acknowledges the importance of safeguarding personal information and is committed to maintaining the confidentiality and security of the data it collects and stores. We implement stringent measures to protect personal data from unauthorized access, misuse, interference, loss, modification, or disclosure. Employees of NISE INVEST are required to always maintain the confidentiality of client data.

Personal information is securely stored within computer-based storage systems and physical records. Our internal security protocols include regular password audits, restricted employee access to sensitive data, and automatic logging of unauthorized access attempts. Access levels are periodically reviewed, and employees' system permissions are adjusted in accordance with their job roles. Additionally, our system automatically limits the volume of personal data displayed on screens at any given time to minimize the risk of exposure.

To further enhance data security, NISE INVEST encrypts information during transmission over external networks, ensuring that personal data remains protected from unauthorized interception. Physical and electronic safeguards are also implemented to prevent unauthorized employees from modifying or updating personal information. Additionally, printed reports containing sensitive information are subject to strict access controls.

We will retain personal information only for as long as necessary to provide individuals with requested services, execute and administer contractual relationships, and meet regulatory or tax compliance obligations. Certain records, particularly those relating to business transactions or legal requirements, must be retained for mandatory periods as specified by applicable regulations. Once personal data is no longer needed for these purposes, we will take steps to delete or de-identify the information to prevent further use.



12. Direct Marketing

NISE INVEST may engage third-party service providers to assist in promoting our products and services to individuals. However, we do not use personal information for direct marketing unless specific conditions are met. We only utilize personal information for marketing purposes when it does not include sensitive data, when an individual would reasonably expect such use, and when we provide a clear and simple way to opt out of receiving marketing communications. Additionally, we ensure that any individual who has requested to opt out of direct marketing will no longer receive such communications from us.

If an individual would not reasonably expect us to use their personal information for direct marketing purposes, we will only proceed with such use if explicit consent has been obtained or if it is impracticable to secure such consent. For any marketing-related communications involving sensitive personal information, NISE INVEST will only process or disclose such data if the individual has expressly consented to this use.

Individuals have the right to opt out of direct marketing at any time, and NISE INVEST will honour such requests within a reasonable timeframe. Additionally, individuals may request details on the source of their information used for marketing purposes, and we will provide this information free of charge within a reasonable period.

For individuals whose personal information is being processed under the GDPR, we will only provide marketing-related communications if explicit opt-in consent has been granted. At any time, an individual may withdraw consent and opt out of receiving future marketing communications.

13. Identifiers



NISE INVEST does not use government-issued identifiers, such as tax file numbers, Medicare numbers, or provider numbers, for internal file recording purposes. Unless an exemption under the Privacy Act applies, we take measures to avoid data-matching using these identifiers. Our policies ensure that we comply with regulatory requirements while maintaining the confidentiality and integrity of individuals' personal data.

14. How Do We Keep Personal Information Accurate and Up to Date?

NISE INVEST is committed to ensuring that the personal information we collect, hold, use, and disclose is relevant, accurate, complete, and up to date. We encourage individuals to reach out to us whenever updates to their personal information are necessary. Keeping information current allows us to provide better service and ensure compliance with relevant regulatory obligations.

If we identify or are informed that personal information, we hold is incorrect, we will take reasonable steps to rectify it. In cases where the incorrect information has previously been disclosed to another entity, we will notify that entity within a reasonable timeframe to ensure consistency and accuracy across all records.

When we determine that information needs to be corrected, we will complete the necessary updates within 30 days unless the individual agrees to an alternative timeframe. NISE INVEST does not impose any charges for correcting or updating personal information. Our priority is to maintain accurate records to serve our clients effectively and uphold data integrity.

15. Access to Personal Information



Subject to the exceptions outlined in the Privacy Act, individuals have the right to access the personal information that NISE INVEST holds about them. To request access, individuals may contact the Privacy Officer at NISE INVEST. We will process access requests within 30 days from the date of receipt.

By law, we do not have to provide you with access to your personal information if:

- (a) We believe there is a threat to life or public safety;
- (b) There is an unreasonable impact on other individuals;
- (c) The request is frivolous or vexatious;
- (d) The information wouldn't be ordinarily accessible because of legal proceedings;
- (e) It would be unlawful;
- (f) It would jeopardise taking action against serious misconduct by you;
- (g) It would be likely to harm the activities of an enforcement body (e.g. the police); or
- (h) It would harm the confidentiality of our commercial information.

If we are unable to provide access to the requested information, we will explain the reasons for refusal.

Individuals requesting access to their personal information can review it in person at our offices or request copies of the relevant records. For security purposes, we require identity verification and specification of the information being sought before processing any requests. An administrative fee may be charged to cover search and photocopying costs for providing access to personal data.

16. Our Cookie Policy



When clients visit our website, cookies may be placed on their devices to help us track user activity, measure the effectiveness of advertising campaigns, and record client interest in our products. Our marketing and advertising partners, including Google and other platforms, help us analyse user behaviour and optimize user experience.

Cookies used by NISE INVEST and our third-party partners do not collect personal details such as names, email addresses, phone numbers, or home addresses. Clients can disable cookies through their browser settings at any time. However, we recommend keeping cookies enabled to enhance the user experience and receive targeted materials from us.

17. Updates to This Policy

This policy will be reviewed periodically to account for new laws, technological advancements, and changes in our operations and the business environment. NISE INVEST is committed to ensuring that its privacy practices remain up to date and comply with all relevant legal and regulatory requirements. Any changes to this policy will be reflected in an updated version, which will be made available to all relevant parties.

18. Responsibilities

It is the responsibility of NISE INVEST' management to inform employees and third parties about the Privacy Policy, including any updates or modifications. Management must ensure that employees, service providers, and other relevant stakeholders understand and comply with this policy. Employees and any third parties dealing with NISE INVEST must be aware of and adhere to the requirements outlined in this Privacy Policy.

19. Privacy Training

All new employees of NISE INVEST will receive timely and appropriate access to the Privacy Policy. Employees will be provided with opportunities to attend privacy training, which includes an overview of NISE INVEST' legal obligations under the Privacy Act. These training sessions aim to educate employees about their responsibilities concerning personal information and ensure compliance with all applicable privacy regulations.

20. Non-Compliance and Disciplinary Actions

NISE INVEST enforces strict compliance with its Privacy Policy. Any privacy breaches must be reported to management immediately by employees and relevant third parties. Ignorance of the Privacy Policy will not be considered an acceptable excuse for non-compliance. Any failure to comply with the Privacy Policy may result in disciplinary action, including potential termination of employment or contractual relationships.

21. Contractual Arrangements with Third Parties

NISE INVEST ensures that all contractual agreements with third parties include adequate privacy protections. Third parties handling personal information on behalf of NISE INVEST must adhere to this Privacy Policy and the Privacy Act. All contractual arrangements with external service providers, affiliates, and business partners must include policies that:



- Regulate the collection, use, and disclosure of personal and sensitive information.
- Encourage de-identification of personal and sensitive data wherever possible.
- Mandate secure storage of personal and sensitive data, restricting access to authorized employees or agents only.
- Ensure that personal and sensitive information is disclosed only to approved organizations that comply with privacy regulations.

22. Electronic Verification Terms and Conditions

NISE INVEST is required by the Australian Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and other regulatory frameworks applicable to Australian Financial Services License (AFSL) holders to verify client identities before providing financial products and services. This process ensures regulatory compliance and financial security.

Electronic Verification Process

To verify client identities electronically, NISE INVEST collects personal details such as name, address, and date of birth, along with official identification documents. This information is then provided to external verification organizations that compare it with their databases to confirm its accuracy.

External data sources used for identity verification may include:

- Credit information files maintained by Equifax Pty Ltd (used solely for identity verification, not for credit assessment).
- Publicly available records, such as the electoral roll and white pages.



- Data from official record-keeping bodies accessed via third-party verification systems.

Providing false or misleading identity information is a violation of the Australian Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and may result in legal penalties.

Your Agreement

By agreeing to NISE INVEST' terms and conditions, clients confirm that:

1. The personal information provided is accurate and belongs to them, and they have the legal authority to share it.
2. NISE INVEST is authorized to collect, use, and disclose their personal information for electronic verification in accordance with legal and regulatory requirements.

This verification process is essential for account creation and regulatory compliance, ensuring that NISE INVEST upholds the highest standards of financial security and data protection.

23. Complaints Handling

If you wish to make a complaint, we ask that you follow the process outlined below. This will help us resolve your complaint in the most efficient manner possible, ensuring that we regain your confidence in our services.

To begin, please gather all relevant supporting documents related to your complaint. Consider the questions you need answered and the desired resolution before reaching out. The next step is to contact your account manager directly. If the issue is current, calling at the



earliest possible time will maximize the chances of an immediate resolution.

If your account manager is unable to satisfactorily resolve the complaint, request them to escalate the issue to their manager. If your complaint specifically concerns your account manager, you may request to speak with our Compliance Department.

Should your complaint remain unresolved, you may escalate the matter to our Compliance Department, if we have not already done so. The Compliance team will review your complaint thoroughly and contact you directly.

For direct contact, you can reach our Customer Service Team by emailing support@nise.com.au

NISE INVEST aims to resolve most complaints within 30 days. However, some issues may be complex and require additional time for thorough investigation. In such cases, we will keep you informed of our progress throughout the resolution process.

If you are not satisfied with ZERO Market's decision, you may escalate the complaint directly to the Information Commissioner for investigation:

Office of the Australian Information Commissioner (**OAIC**)

www.oaic.gov.au

Phone: 1300 363 992

When investigating a complaint, the OAIC will initially attempt to conciliate the complaint, before considering the exercise of other complaint resolution powers.



24. Data Breach Reporting

As an Australian Financial Services Licence (**AFSL**) holder, NISE INVEST is required to comply with the Australian Privacy Act 1988 and other relevant data protection laws, including the **GDPR**, where applicable. This means that we are obligated to report serious data breaches in accordance with legal and regulatory requirements.

If a staff member becomes aware of a possible data breach, where confidential information may have been accessed without consent, they must immediately report the incident to the Compliance Manager.

The Compliance Manager, in conjunction with Senior Management, will investigate the matter and determine whether legal advice is required. If it is determined that the breach could result in serious harm, appropriate action will be taken in compliance with the Australian Privacy Act 1988 and the GDPR's data breach notification requirements.

NISE INVEST takes data security very seriously and has strict protocols in place to prevent unauthorized access, mitigate risks, and comply with all legal obligations concerning data breaches.