

Nomura Global Financial Products Inc.  
Swap Dealer Privacy Policy – Doing Business in Australia

Protecting your privacy is important to Nomura Global Financial Products Inc. (ARBN: 623 394 141) (“**NGFP**”). This policy covers all personal information that is collected in relation to NGFP’s business activities in Australia.

**How NGFP collects personal information**

NGFP collects personal information about you in the following ways:

- when the organisation you work for uses NGFP’s services;
- when you are engaged as a contractor to provide services to NGFP;
- when you submit a query or request to NGFP;
- from public sources; and
- from third parties who are entitled to disclose that information to NGFP.

In some cases NGFP may be required by law to collect certain types of personal information about you, including for example under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

Where NGFP collects personal information from you, it will generally do so directly. However, in some cases it may collect personal information from a third party, through your representatives or contractors who provide it services.

**Kinds of personal information NGFP collects**

The kinds of personal information that NGFP collects and holds about you may include:

- identifying information, such as your name and date of birth;
- contact information, such as your postal address, email address and telephone number;
- if you are an authorised person of NGFP, additional personal information (including sensitive information) about you such as your criminal history;
- details of any services that are provided to the organisation you work for and information about how you use the services provided; and
- records of communications with you, including any messages you send to us.

Sensitive information is only collected from you if it is necessary in the circumstances and you have consented to that collection.

Without this information NGFP may not be able to provide you with products or services (or with all of the features and functionality offered by the products or services) or to respond to queries or requests that you submit.

## **Purposes for which NGFP uses personal information**

NGFP uses personal information that is collect about you for the following purposes:

- to verify your identity when you are dealing with NGFP;
- to enable NGFP to provide you products and services;
- to answer your queries and requests;
- to comply with legal and regulatory obligations in any jurisdiction;
- to assess, maintain, upgrade and improve products and services;
- to manage and resolve any legal or commercial complaints or issues;
- to enable business management and carry out planning and forecasting activities and other internal business processes, including compliance and risk management; and
- recruitment purposes (for example, as an authorised person of NGFP).

Your information may also be used and disclosed for other purposes in accordance with your requests or instructions.

## **People to whom NGFP may disclose personal information**

NGFP may share personal information about you with:

- your representatives, advisers and others you have authorised to interact with NGFP on your behalf;
- staff who need the information to discharge their duties;
- related entities within the corporate group (the Nomura Group);
- business partners, agents and service providers;
- prospective purchasers of all or part of the business or shares in the company or a related entity;
- professional advisers who are engaged to provide advice on the business; and
- government authorities who request that information, or to other people as required by law or to any other third party to ensure compliance with a legal obligation.

As NGFP operates globally, in some cases the people to whom your personal information is disclosed may be located overseas. The countries in which these people are likely to be located include Japan, the United Sates, the United Kingdom, India, Singapore and Hong Kong.

## **Storage and security of personal information**

The personal information collected is generally stored in electronic databases, some of which may be held by third party data storage providers. Sometimes hard copy records of this personal information are

held in physical storage facilities. A range of physical and technical security processes and procedures are in place to protect the confidentiality and security of the information held. These processes and procedures are updated from time to time to address new and emerging security threats.

### **Access and correction**

If you want to access any of the personal information that NGFP holds about you or to correct some aspect of it (e.g. because you think it is incomplete or incorrect), please contact your sales representative. To protect the integrity and security of the information, you may be asked to follow a defined access procedure, which may include steps to verify your identity. If NGFP is unable to provide the information you request, you will be informed of the reason why, for example if it would interfere with the privacy of others or result in a breach of confidentiality.

### **Complaints**

NGFP tries to meet the highest standards in order to protect your privacy. However, if you are concerned about the way in which your personal information is being managed and think NGFP may have breached the Australian Privacy Principles, or any other relevant obligation, please contact [ClientServices@nomura.com](mailto:ClientServices@nomura.com). Your matter will be dealt with as timely as possible and you will be kept informed of the progress of the investigation.

If you have not received a response within a reasonable time or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Office of the Australian Information Commissioner.

### **Changes to this policy**

Changes may be made to this policy from time to time, to take into account changes to standard practices and procedures or where necessary to comply with new laws and regulations. The latest version of this policy will always be available on the Nomura Group website <http://www.nomuraholdings.com/policy/privacy.html>.

### **Contact details**

If you want any further information from us on privacy matters, please contact your sales representative.