

PRIVACY POLICY

(Effective March 01, 2026)

1. About this Policy

"mTrade" is the trading name used by:

- **Merkle Pty Ltd** (Australia)
- **Merkle Prime Limited** (Hong Kong)

Each entity is a separate legal entity and is responsible for the personal information it collects and controls. This policy explains how we collect, use, disclose, and protect personal information in connection with the website at merkletrade.com and related business communications.

It's important to note that; (1) Merkle Pty Ltd handles personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs) and (2) Merkle Prime Limited handles personal data in accordance with the *Personal Data (Privacy) Ordinance* (Cap. 486) of Hong Kong (PDPO).

2. What We Collect

Because this is a business website, the personal information we collect is limited. *Information you provide*. If you contact us or subscribe to updates, we may collect:

- name;
- email address;
- organisation and role;
- information contained in your message or enquiry.

Provision of this information is generally voluntary. However, if you do not provide certain details, we may be unable to respond to your enquiry or consider a commercial relationship. *Information collected automatically*. When you visit the website, our servers may record:

- IP address;
- browser and device type;
- pages visited;
- date and time of access.

This information is used for website administration and basic performance monitoring. We do not knowingly collect sensitive personal information through this website.

3. How We Use Information

We use personal information only where reasonably necessary for our business activities, including to:

- respond to enquiries;
- assess potential commercial relationships;
- send updates where requested;
- maintain and improve the website;
- comply with legal obligations;
- protect against fraud and security risks.

We do not sell personal information. We do not use personal information for automated decision-making or profiling.

4. Disclosure of Information

We may disclose personal information to:

- website hosting and IT service providers;
- email and communications service providers;
- professional advisers (legal, accounting, audit);
- regulators or law enforcement where required or reasonably necessary;
- between Merkle Pty Ltd and Merkle Prime Limited where relevant to a shared commercial matter.

Service providers are engaged under appropriate confidentiality obligations.

5. Cross-Border Handling

Because our business operates across Australia and Hong Kong, personal information may be transferred between those jurisdictions. Our service providers may also store or process information in other countries.

It is important to note that: (1) where personal information collected by Merkle Pty Ltd is transferred outside Australia, we take reasonable steps to ensure that the overseas recipient handles it consistently with the Australian Privacy Principles and (2) where personal information collected by Merkle Prime Limited is transferred outside Hong Kong, we take reasonable steps to ensure it continues to be protected to a standard comparable with the PDPO.

6. Retention

We retain personal information only for as long as reasonably necessary for the purposes for which it was collected, to manage commercial relationships, and to comply with legal and record-keeping obligations. As such, and where practically possible, information that is no longer required is deleted or de-identified where practicable.

7. Security

We take reasonable technical and organisational measures to protect personal information from unauthorised access, loss, misuse, or disclosure. But you agree and acknowledge that no internet transmission or electronic storage system is completely secure, and that we cannot guarantee absolute security.

Where required under applicable law, we will notify affected individuals and relevant regulators of eligible data breaches.

8. Access and Correction

You may request access to personal information we hold about you, or request correction if it is inaccurate. Where lawful and practicable, you may also choose to interact with us anonymously or using a pseudonym.

Requests may be made using the contact details below.

- If you are in Australia and are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC).
- If you are in Hong Kong and are not satisfied with our response, you may lodge a complaint with the Office of the Privacy Commissioner for Personal Data (PCPD).

We encourage you to contact us first so we can attempt to resolve the issue directly.

9. Direct Marketing

If you have subscribed to receive updates from us, we will use your name and email address to send those updates. You can opt out at any time using the link in any email we send, or by contacting us at the address below.

Where required under the PDPO, we will obtain your consent before using your personal data for direct marketing purposes and will provide a clear means to opt out.

10. Cookies

The website uses cookies and similar technologies to ensure it functions properly and to understand general site usage. Cookies are small text files stored on your device. You may manage or disable cookies through your browser settings. Disabling cookies may affect parts of the website.

We do not use cookies for behavioural advertising.

11. Children

This website is intended for business and professional audiences. We do not knowingly collect personal information from children.

12. Contact

Privacy enquiries, access requests, or complaints may be directed to: privacy@merkletrade.com or to the registered office of the relevant entity.

13. Changes to this Policy

We may update this policy from time to time. The effective date above indicates when it was last reviewed. The current version will be published on this website.