# FINANCIAL SERVICES GUIDE ('FSG')

#### SERVICE PROVIDER INFORMATION

Service provider:	SendFX Pty Ltd ACN 617 647 220 ('Send')
Contact details:	Registered office:
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	Website:
	www.sendfx.com.au
Australian Financial Services Licence:	509635
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### **PURPOSE**

This Financial Services Guide contains important information to assist you in making an informed decision about whether to utilise our Services. The purpose of this guide is to provide you with material information before you enter into a transaction with Send for our Services, including the following information:

- who will be providing the Services and how vou can contact us;
- the kinds of financial services offered, and what we are licenced to provide;
- who we are acting for;
- what documentation we will provide to you and how we comply with our record keeping obligations;
- how we are remunerated for the Services we provide and what remuneration and commission will be received by our staff, representatives and partners;
- any relevant relationships that may result in a conflict of interest;
- our compensation arrangements;
- our privacy obligations;
- how you can make a complaint and how complaints are dealt with.

If you need further information, please contact us at <a href="mailto:info@sendfx.com.au">info@sendfx.com.au</a>.

## SEND'S SERVICES

Australian Financial Services Licence ('AFSL')
Authorisation

Send is the holder of an AFSL (licence number 509635), and is authorised pursuant to this licence to carry on a financial services business to:

- a. provide general financial product advice for the following classes of financial products:
  - deposit and payment products limited to non-cash payment products; and
  - ii. foreign exchange contracts;
- b. deal in a financial product by:
  - i. issuing, applying for, acquiring, varying or disposing of a financial product in respect of the following classes of financial products:
    - (A) deposit and payment products limited to non-cash payment products; and
    - (B) foreign exchange contracts; and
  - applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of the following classes of products:

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- (A) deposit and payment products limited to non-cash payment products; and
- (B) foreign exchange contracts; and
- c. make a market for foreign exchange contracts limited to remittance contracts;

to retail and wholesale clients.

#### Send's Services

Send provides the following services:

- general advice regarding our financial products;
- dealing services for foreign exchange spot and forward transactions and contracts; and
- market-making services in respect of our foreign exchange products.

## Methods of providing Services

When utilising our Services, we may accept instructions from you in person, by telephone, online through our secure website, or by another method mutually agreed by us.

## WHO DO WE ACT FOR?

We act for you as principal when providing the Services. Where a client is made up of more than one person, we act for those persons jointly unless mutually agreed to the contrary.

## **DOCUMENTATION**

Send will provide important documentation to you to assist in the provision of our Services and to help you make informed decisions.

These may include:

- Terms and Conditions that you will be required to accept prior to utilising our Services and that will apply to every transaction you make while using our Services:
- confirmation documentation in regards to transactions you make;
- Product Disclosure Statement for any financial products offered to you, which will outline key information about the relevant product so you can make an informed decision about whether to purchase the product.

Copies of our Terms and Conditions, Product Disclosure Statement and this Financial Services

Guide will be available on our website, or by email request to <u>info@sendfx.com.au</u>.

## GENERAL ADVICE WARNING

We will only ever provide you with general advice regarding any transaction you enter into with Send. This advice will not take into account your personal situation and objectives or your specific financial circumstances.

Accordingly, you will need to make your own assessment as to whether our Services are appropriate for you. We recommend that you take all necessary steps to understand the risks and implications of utilising our Services and obtain independent advice from a licenced professional regarding the suitability of our Services for you prior to retaining Send's Services.

While Send will take all reasonable steps to ensure the information and general advice provided is accurate and reliable, Send makes no representations about the accuracy, completeness or currency of any information or general advice given. No responsibility is assumed regarding the accuracy, completeness or currency of any information or general advice provided, by Send or by its directors, employees, officers, agents, associates, contractors or subcontractors.

### SEND'S RECORD KEEPING OBLIGATIONS

Send will maintain accurate records of all transactions entered into and any advice given. Send may record telephone calls and retain those recordings in accordance with our call recording and data retention policies. These recordings may be used for training purposes and in the event that there is a dispute with you.

# REMUNERATION, COMMISSION AND BENEFITS

### Send's income

Send is generally remunerated for its services from profit generated from the spread applied to foreign currency exchange transactions. That is, the difference between the wholesale market rate that we purchase from our liquidity providers, and the trade price which is then sold and provided to you. Send's income is incorporated into the exchange rates quoted to you and is not an additional fee.

Our profit amount will vary depending on the currency, the market, and arrangements we enter into with third parties, including our liquidity provider/s.

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#### Third party transaction and processing fees

While Send does not charge any fees for the use of its Services, in some instances transaction and processing fees may be charged by third party banks. For example, where payment failure fees are charged. These fees are set by the third-party provider and will be passed on to you.

Third party transactions and processing fees will vary depending on the relevant charge and the third party.

#### Commissions and Remunerations paid by us

Our staff and representatives receive remuneration from us and may receive commission for assisting you with providing our Services. The calculation of commission varies depending on the staff member or representative, their role and experience.

# Referral Agreements

We may enter into referral agreements with partners and pay commission to those partners in respect of referrals made by them. Commission structures will vary depending on the partner, but will typically be calculated as a percentage of the net profit generated by each transaction made by a client referred by the partner.

# Particulars of commissions

You may request further particulars of commission or other benefits payable in respect of our Services, however this request must be made within a reasonable time after being given this Financial Services Guide and before any Service identified in this guide is provided to you.

### CONFLICT OF INTEREST DISCLOSURE

Subject to any further disclosures outlined in our Product Disclosure Statement, we do not have any relationships or associations which might influence us or result in a conflict when providing you with our Services.

# PROFESSIONAL INDEMNITY INSURANCE

Send's professional indemnity insurance complies with the requirements for compensation arrangements outlined under section 912B of the *Corporations Act* 2001 (C'th), and applies to claims made for loss or damage suffered because of legislative breaches by Send or its representatives (including representatives that no longer work for Send).

# **PRIVACY**

Your privacy is important to us. We are committed to complying with our legislative obligations under the

Privacy Act 1988 (C'th) and all other relevant regulations, and we have implemented policies to safeguard your information, including secure data storage and access procedures, and technology-based security and access mechanisms.

By agreeing to our Terms and Conditions, you agree and consent to our use of your personal information in the manner outlined under our Privacy Policy, which is available on our website. Send will not otherwise disclose your personal information without your consent.

If you have any concerns regarding the use of your Personal Information or our Privacy Policy, or would like to receive a copy of our Privacy Policy please contact us at info@sendfx.com.au.

#### **COMPLAINTS HANDLING**

We have an internal dispute resolution process in place to handle any concerns or complaints that you may have as quickly and fairly as possible.

In the first instance, any concerns or complaints you have should first be raised with your usual contact at Send. If the matter is not resolved to your satisfaction, you may escalate your complaint in writing to our Head of Operations who will conduct an investigation and attempt to resolve the matter within 21 days, or such other time period that is reasonably necessary having regard to the circumstances.

If you are not satisfied with the outcome of our internal investigation you have the right to complain to the Australian Financial Complaints Authority ('AFCA'). AFCA is an approved external dispute resolution scheme of which Send is a member, and provides an independent financial services dispute resolution process which is free for consumers.

You can contact AFCA as follows:

Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

Tel: 1800 931 678 (free call) Email: info@afca.org.au Website: www.afca.org.au

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