



Contracts for Difference (CFD) Financial Services Guide

CTRL Investments Ltd

17 February 2020

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1. About this Financial Services Guide

CTRL Investments Ltd ARBN 152 535 085 has prepared this Financial Services Guide (**FSG**) which is dated 17th of February 2020. CTRL Investments Ltd operates under the registered Australia business name HFTTrading.

HFTTrading is authorised by the Australia Securities and Investments Commission (**ASIC**) to provide certain financial services in Australia under Australian Financial Services Licence (**AFSL**) number 414198. We have appointed the following Authorised Representative to provide some of these services to you on our behalf:

XSolutions Technologies Limited

Reference in this FSG to "we", "us" or "our" should be read as a reference to HFTTrading, or a reference to both HFTTrading and its Authorised Representative, as the context requires.

This FSG sets out the services that may be provided to you by HFTTrading or its Authorised Representative and would be given to you by the relevant provider of the service. HFTTrading, as the authorising licensee, has authorised the distribution of this FSG by its Authorised Representative.

It is designed to assist you in deciding whether to use any of those services and contains important information about:

- who we are;
- how we or our Authorised Representative can be contacted;
- the financial services we can offer;
- how we or our Authorised Representative is paid;
- our relationships and how these could influence our advice to you;
- how we protect your privacy; and
- who to contact if you have a complaint or if you are not satisfied with the services provided.

2. About us

HFTTrading is a CFD provider registered in New Zealand as a private company limited by shares and registered in Australia as a registered foreign company. You can contact HFTTrading using the details below:

Via our website: www.hftrading.com.au

By email: support@hftrading.com

By telephone (Customer Service Department): +61 391139456

3. What financial services do we offer?

Our AFSL allows us to provide dealing and execution services in foreign exchange contracts and derivative products, including OTC derivative products such as CFDs, and to provide general advice to you regarding these products.

We have authorised our Authorised Representative to provide general advice on foreign exchange contracts and derivative products, on our behalf.

HFTrading is an issuer of CFD products and acts as principal when you trade in these products with us.

Either HFTrading or our Authorised Representative may provide general advice to you about the CFD products that we offer.

We may provide general advice by:

- Answering your questions in person, in writing or by telephone; and
- Providing you with information about our CFD products on our website, in our newsletters or in other media.

We do not provide financial planning services or personal advice. We will not provide you with personal advice when you visit our website or contact our customer service centre(s), or at any other time.

The financial advice we provide to you is general advice only. It does not take into account any of your investment objectives, financial situation or particular needs. Accordingly, you should consider the appropriateness of the advice, having regard to your objectives, financial situation and particular needs. We also recommend that you seek professional advice before making any investment decisions.

Before you start trading with us, we are required to provide you a copy of our Product Disclosure Statement (**PDS**). Our PDS is designed to help you understand the risks associated with the particular CFD products and services that we offer, assess their potential benefits and decide whether an investment in CFDs is suitable for you. You should also read our Terms of Use, which govern our trading relationship with you.

CFDs are high-risk financial products so you should read the PDS and Terms of Use in full before making any decision to trade with us. Our PDS and Terms of Use are available on our website or you can contact us to request a hard copy, free of charge.

You should note that any capitalised terms used in this FSG to describe features of the services that we offer, have the same meaning as the terms used in our PDS.

4. Giving us instructions

You can only provide dealing instructions to HFTrading. You should not provide any dealing instructions to our Authorised Representatives as we have not authorised them to deal in financial products. They are only authorised by us to provide general advice to you about the products we offer.

You can give HFTrading dealing instructions through our Trading Platforms. If you need to contact us for any other reason, you can do so by phone or in writing via post or email using the details in **Section 2**. Our phone lines are recorded to provide a record of communications between you and us.

5. Remuneration and other benefits

We do not earn any spread from the CFD positions you enter into with us.



We earn a commission from our hedge counterparty, CTRL Capital Limited (**CTRL Capital**) which is based on the volume of hedged positions. The spread and commissions may be incorporated in the spreads which CTRL Capital quotes to us (which are the spreads we quote to you).

We may charge you a monthly inactivity fee if there is no or low trading activity in the account for a consecutive period of two months. If you hold a position overnight, we will also charge you an overnight financing fee. In certain circumstances, we may also charge you a withdrawal fee.

Please refer to our PDS and website for further information about the fees and charges that may apply to your account.

6. Relevant Associations and Relationships

CTRL Capital is a related entity of HF Trading. We hedge all of your positions by taking offset positions with CTRL Capital. We quote to you the same prices that are quoted to us by CTRL Capital. CTRL Capital may incorporate a spread into the prices they quote to us and earn revenue in this way.

We do not have any other relationships or associations (including those of our Authorised Representative) that might influence the services provided to you.

7. What should you do if you have a complaint?

If you are not satisfied with the service you receive from us or our Authorised Representative, you are entitled to complain. We have established procedures to ensure that all enquiries and complaints are properly dealt with.

Any complaints or concerns you have should be directed to HFT Trading, by completing and submitting the relevant form which can be found [here](#) and sending it to support@hftrading.com.

We will seek to acknowledge any complaint promptly and provide a substantive response within no more than 45 days.

If, after giving us the opportunity to resolve your complaint, you feel we have not resolved it satisfactorily, you may also lodge a written complaint with the Australian Financial Complaints Authority (**AFCA**). HFT Trading is a member of AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers. The contact details for AFCA are as follows:

Website: www.afca.org.au

Email: info@afca.org.au

Telephone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

8. Our compensation arrangements

HFTrading has in place a professional indemnity insurance policy (**PI policy**), as required under s912B of the *Corporations Act 2001* (Cth).

The PI policy covers HFTrading and its representatives including the Authorised Representative for claims made against them by clients as a result of their conduct in the provision of financial services. Our policy will cover us for claims relating to the conduct of former representatives/employees who no longer work for us.

9. Your privacy

HFTrading and our Authorised Representative collect, use and disclose your personal information to provide you with the services and associated support that you request. We also use your personal information to respond to your enquiries or feedback and to promote products and services offered by us.

The HFTrading's Privacy Statement explains how we and our Authorised Representative collect personal information about you and how we maintain, use and disclose that information. We'll handle any information we collect about you in line with the Privacy Statement, which complies with the *Privacy Act 1998* (Cth) and the Australian Privacy Principles under this Act. Our Privacy Statement can be viewed in full on its website at www.hftrading.com.au/privacy.

10. Further information

If you have any further questions about us or the financial services we provide, please contact us.

Please retain this document for your reference and any future dealings with us.