PRIVACY POLICY

Version 01.2024

First Floor, Kildare Centre Cnr of Kildare Road and Main Street
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1. INTRODUCTION

1.1. APLFX (PTY) LTD (hereinafter "the Company", "us", "our" "we") is incorporated in South Africa and registered under the Companies and Intellectual Property Commission (http://www.cipc.co.za/) with a registration number 2021/804619/07. The Company is authorised and regulated by the Financial Sector Conduct Authority ("FSCA") with authorisation number 52045, to provide intermediary services in connection with derivative products, operating under the Financial Advisory and Intermediary Services Act ("FAIS Act").

1.2. The Company is acting as a Financial Service Provider and in accordance with the FAIS Act, is required to have in place and disclose to its Clients this Complaints Resolution Process (the "Process").

1.3. Privacy is very important for us, and we are committed to protecting and respecting your personal data. The development of a standard operating procedure to ensure the effective protection of client and/or user information as well as the development of operations and risk management is of the utmost importance to us.

1.4. Personal information which are processed by the Company is done so in accordance with the provisions of the Protection of Personal Information Act 4 of 2013 ("PoPI Act"), the provisions of International Principles of Information Protection and the Basic Provisions of the Constitution of South Africa 1996.

2. DEFINITIONS

Act: means the Protection of Personal Information Act No. 4 of 2013. (hereinafter the "PoPI Act")

Information: means any Data relating to the Data Subject and include reference to personal information.

Data Subject: means the person to whom the personal information relates and can include Clients, staff and/or Company information.

Policy: means this policy on the lawful processing and protection of client Information

Procedure: means a statement or number of statements, contained in a separate yet linked document, the effect of which is to prescribe those things that must be done or omitted in order to ensure adherence with this policy and the Act.

Processing: means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

a) the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use;

b) dissemination by means of transmission, distribution or making.

c) available in any other form; or

d) merging, linking, as well as restriction, degradation, erasure or destruction of information.

Responsible Party: means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.

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Unique Identifier: means any identifier that is assigned to a data subject and is used by a responsible party for the purposes of the operations of that responsible party and that uniquely identifies that data subject in relation to that responsible party.

3. PERSONAL INFORMATION WE COLLECT

As per the PoPI Act's definition of Personal Information: "information relating to an identifiable, living natural person, and where it is applicable, an identifiable, existing juristic person, including but not limited to:

a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
b) information relating to the education or the medical, financial, criminal or employment history of the person;
c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person
d) the biometric information of the person;
e) the personal opinions, views or preferences of the person;
f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
g) the views or opinions of another individual about the person; and
h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person"

The following personal data of customers, potential customers and other users of the website and platform include:

- Name, Surname, and contact details
- Information about income, wealth, assets and liabilities, other account balances, history of trading statements, tax and other financial statements.
- Profession, employment status and other employment related details.
- Location Information, jurisdiction, residency and nationality.
- Knowledge and experience in trading and risk tolerance questions.
- IP address, device specifications.
- Bank account, e-wallets, credit card details.

4. INFORMATION REQUIRED TO BE COLLECTED BY LAW

We are required under the law to identify any person who opens an account with us, or any new person who becomes a signatory to an existing account. The Anti-Money Laundering laws require us to record certain documents to meet the standards as these are set by the law. The documents that we collect, and store are:

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a. passport;
b. driver's licence;
c. national identity card (if applicable);
d. utility bills;
e. trust deed (if applicable);
f. a credit check on the individual; or
g. other information we consider necessary to our functions and activities.

Corporate clients are required to provide further documents and information, such as the corporate documents of address, shareholder information, directors, other officers and the personal information of all of the abovementioned.

Obtaining the above information can happen through different ways, in which we see fit to be able to provide our services such as through the account opening process, demo sign up, website cookies, subscription to our email services and any other way form that information was shared for the course of our ongoing relationship.

Personal Information may also be collected through third-parties such as publicly available lists, social media, introducing brokers or affiliates, banks and other credit institutions, intelligence databases and other third-party associates.

5. THE 8 POPIA PRINCIPLES

Principle 1: Accountability: The FSP must appoint an Information Officer who will be responsible for ensuring that the 8 POPIA information principles are implemented and enforced in the FSP.

Principle 2: Processing Limitation: Only necessary Information should be collected, directly from the person to whom the Personal Information relates and with their consent and the processing should be for a lawful purpose.

Principle 3: Purpose specification: Personal Information should be collected for a specific purpose and the Data Subject must be made aware of the purpose for which it was collected.

Principle 4: Further processing limitation: Further processing of Personal Information must be compatible with the purpose for which the information was collected (Principle 3).

Principle 5: Information quality: Reasonable steps must be taken to ensure that all Information collected is accurate, complete, not misleading and up to date in accordance with the purpose for which it was collected (Principle 3).

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Principle 6: Openness: The Party collecting the Information must be transparent and inform the applicable regulator if it is going to process the Information and ensure that the Data Subject has been made aware that his/her Information is going to be collected.

Principle 7: Security Safeguards: The integrity of the Information under the control of a party, must be secured through technical and operational measures.

Principle 8: Data Subject Participation: Data Subjects have the right (free of charge) to request confirmation from the party that holds their Information on the details they hold and may request for it to be amended/deleted.

6. PRACTICAL IMPLICATIONS OF THE POPIA DATA PROTECTION PRINCIPLES

Appointment of the Information Officer:

The FSP has appointed an Information Officer who is a senior person in the FSP, who will be responsible for ensuring that the FSP has been properly informed and trained on ensuring the safekeeping and protection of Information in the FSP and that the required processes are implemented to ensure compliance. The Information Officer can be contacted at via email at support@fxglobe.com.

Information purpose:

The type of Information the FSP collects will depend on the purpose for which the Data is collected and used. The FSP will collect the necessary Information from Data Subjects for various purposes, including the following:

- rendering suitable services for e.g. financial services (including the rendering of advice and intermediary services) and administrative services to Data Subjects;
- improving services and product offerings to Data Subjects;
- providing information and resources most relevant and helpful to Data Subjects;
- appointing suitable individuals/ companies to provide financial services/ products to Data Subjects;
- ensuring compliance with legislation that requires specific information to be collected.

Access to Information:

- Data Subjects have the right to request a copy of the Information that the FSP hold on them or their business. Should a Data Subject wish to obtain any such information, the Data Subject may request it by contacting the Information Officer on the details provided above. Any such access request may be subject to the payment of an allowable administration fee.
- The FSP will not disclose or share Information relating to any Data Subject unless: it is specifically agreed with the Data Subject; it is already publicly available or in the interests of the public; required in

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terms of Law or if the FSP believes in good faith that the Law requires disclosure thereof.

- The FSP's PAIA Manual (in terms of the Promotion of Access to Information Act, 2 of 2000) sets out the process for access by third parties to a Data Subject's Information kept by the FSP, and the instances in which it may be refused.

Collection of Information:

General:

- The FSP collects Information in various ways e.g. directly from individuals (for example, when purchasing a financial product, registering an account, using a product, or signing up for a newsletter), from employers, publicly available information, through cookies, and/or similar technology.
- Where possible, the FSP must inform Data Subjects which information they are legally required to provide to the FSP and which information is optional.
- With the Data Subject's consent, the FSP may supplement the information with other information received from other companies and/or organizations such as the South African Revenue Services (SARS) in order to enable the FSP to render suitable and proper services to Data Subjects.

User Supplied Information:

The Data Subject may be required to provide some personal information, for example, his/her name, address, phone number, email address, payment card information (if applicable), and/or certain additional categories of information as a result of using/ receiving financial services, purchasing financial products, and using websites and related services. The FSP will keep this information in a contact database for future reference, as needed.

Marketing:

The FSP may use certain Information provided by Data Subjects to offer them further services that the FSP believes may be of interest to them or for market research purposes. These services are subject to prior consent being obtained from Data Subjects. If a Data Subject no longer wishes to receive further services or offers from the FSP, IT may unsubscribe from the services or contact the Information Officer at the contact details provided above.

Usage and Web server logs:

- The FSP may track information about a Data Subject's usage and visits on the FSPs website. This Information may be stored in usage or web server logs, which are records of the activities on the FSP's services, products and/or sites. The FSP's servers automatically capture and save such Information electronically. Some examples of the Information that may collected include the Data Subject's:
  - Unique Internet protocol address;

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- Name of the Data Subject's the unique Internet Service Provider
- The city, state, and country from which a Data Subject accesses the FSP's website
- The kind of browser or computer used;
- The number of links clicked within the site;
- The date and time of visits to the site;
- The web page from which the Data Subject arrived on the FSP's site;
- The pages viewed on the site;
- Certain searches/queries conducted on the site via the FSP's services, products and/or websites.

- The information collected in usage or web server logs help the FSP to administer the services, products and sites, analyze its usage, protect the product and/or website and content from inappropriate use and improve the user's experience.

Cookies:

- In order to offer and provide a customized and personal service through the FSP's products and websites, the FSP may use cookies to store and help track information about the Data Subject. A cookie is a small text file sent to the Data Subject's device that the FSP uses to store limited information about the Data Subject's use of the services, products or website.
- FSP uses cookies to provide the Data Subject with certain functionality (such as to enable access to secure log-in areas and to save the Data Subject having to re-enter Information into product, services or website forms) and to personalize the FSP's services, products or website content. Without cookies, this functionality would be unavailable.

Retaining of Information:

- The FSP may retain personal information for purposes of reporting, administration, monitoring its website or to communicate with Data Subjects.
- Information may be retained only to serve the purpose of collecting the Information and be deleted/destroyed once the purposes has been fulfilled, subject to subject to other regulatory requirements where Information is to be kept for a specific prescribed period.
- Information and records of the personal nature of Clients and/or Employees will be stored for a period of 5 years before being destroyed.

Correcting/ Amending/ Updating/ Deletion of Information:

- Data Subjects are required to inform the FSP should there be any changes to the Information kept by the FSP.
- A Data Subject may request the FSP to correct, amend, update or delete its Information at any time when applying or making use of any financial products or services of the FSP, by contacting the

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Information Officer at the contact details provided above.

- The FSP will take all reasonable steps to confirm the Data Subject's identity before making changes to Information.

Information Security:

- The FSP will take all reasonable precautions to protect Information from loss, misuse, unauthorized access, disclosure, alteration and destruction.
- The FSP will not sell, rent, or lease mailing lists with Information to third parties and will not make a Data Subject's Information available to any unaffiliated parties, except for approved agents, suppliers and contractors, or as otherwise specifically provided for, as agreed with the Data Subject in writing or as required in terms of any Law.
- The FSP may disclose Information of a Data Subject or Information about a Data Subject's usage of the FSP's financial services, financial products, websites or mobile applications to unaffiliated third parties as necessary to enhance services, financial product experience to meet the FSP's obligations to content and technology providers or as required by law, subject to agreements in place that provides for the protection of Information of Data Subjects.
- The FSP has implemented appropriate security measures to help protect Information against accidental loss and from unauthorized access, use, or disclosure. The FSP stores Information about Data Subjects in a restricted access server with appropriate monitoring and uses a variety of technical security measures to secure Information, including intrusion detection and virus protection software. The FSP may also store and process Information in systems located outside the FSP's premises or the Data Subject's home country. However, regardless of where storage and processing may occur, the FSP takes appropriate steps to ensure that Information is protected as required under relevant Data Protection/Privacy laws.
- The Data Subject's access to some of the FSP's services and content may be password protected and non-disclosure of such usernames and passwords are required to ensure the safekeeping of the Data Subjects Information. It is recommended that the Data Subject sign out and close the browser of the account or service at the end of each session.
- The FSP is legally obliged to provide adequate protection of Information, hold and prevent unauthorised access and use of Information, The FSP is therefore committed to ensure that all Information of the Data Subject (FSP, Clients and/or Employees) will be kept safe and secure and not be disclosed to any unauthorized third parties, without the consent of the relevant Data Subject.
- The FSP may from time-to-time transfer Information within and between various worldwide locations in compliance with the country of origin's regulations and this Policy.
- Persons/ Employees/ Parties (as applicable) are not allowed to disclose any Information to any unauthorized third party as it may lead to a breach, disciplinary action and possible dismissal.
- The FSP takes reasonable steps to protect Personal Information, which is held in a firewalled server. The FSP can however not guarantee the security of information transmitted to it electronically from Data Subjects and they do so at their own risk.
- The FSP maintains administrative, technical and physical safeguards to ensure protection of information against loss, misuse or unauthorized access, disclosure, alteration or destruction of the

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information provided to the FSP by the Data Subject or you're the Data Subjects employer.

- The FSP seeks to ensure compliance with Data Protection/Privacy regulations, laws and industry best practices in respect of the security of a Data Subjects Personal Information and despite the FSP's best endeavors to ensure protection of information.
- Where the Data Subject is located in another country with other data protection/privacy laws, the FSP may transfer Personal Information to such other countries, but they may not always guarantee the same level of protection for Personal Information as the one in which the Data Subject resides (despite the FSP's best endeavor's to ensure protection of Information. By providing information to the FSP, the Data Subject consents to these transfers.

7. YOUR RIGHTS IN CONNECTION TO PERSONAL INFORMATION

7.1. You have the right to be notified if any of the Personal Information you shared with us has access or acquired by an unauthorised person. You also maintain the right to request and obtain a copy of all the personal information that the Company holds on you.

7.2. As the personal information belongs to you, you may request for the destruction of such personal information to the extend permitted by law, as we are required to remain compliant with our regulatory obligations for personal information retention.

7.3. You may also object within reasonable grounds relating to a particular situation to the processing of your Personal Information. You may also object to the processing of your Personal Information for the purposes of direct marketing and other electronic communications.

7.4. You are also within your rights to submit a complaint with the Information Regulator for any alleged misuse of mistreating of your Personal Information as this is found at https://justice.gov.za/inforeg/

7.5. To exercise any of the above rights, or any questions and queries you may have about this policy please get in touch with us at support@fxglobe.com.

8. RESTRICTION OF RESPONSIBILITY

8.1. The Company does not hold any responsibility and shall not be held responsible for the Privacy Policies of any other third-party company, or partner that may be linked to it. The company also has no control on how Client information will be used by such third-parties or partners.

8.2. By accepting the Company's Client Agreement, you grant a license to us to use your Communications in any way we think fit, either on the Web site or elsewhere, inter alias through other platform of communication (i.e. "WhatsApp" and/or any other platform of communication that is/are authorised by the Company), with no liability or obligation to you. We are free to use any idea, concept, know-how or technique or information contained in your Communications for any purpose including, but not limited to, developing and marketing products.

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9. CONSENT TO PROCESS PERSONAL INFORMATION

9.1. By accessing our website and using any method of communication as this is available to you, we consider that you have read and understood this Policy and now we process any information that you disclose to us, including but not limited to personal information prior to becoming a client of the Company.

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