



Trade Markets Privacy Policy

1. INTRODUCTION

The FAIS Act provides for the protection of personal information of Clients; and The Protection of Personal Information Act, 2013 (“POPIA”) provides for 8 Data protection Information principles to apply with to ensure the protection of all data that relates to companies, staff and Clients. The Promotion of Access to Information Act, 2 of 2000 provides for access to such information and in which instances it may be refused.

2. PURPOSE

Data privacy and data protection is important to Astrix Data (PTY) LTD (hereinafter the “Company”) and this Policy sets out the POPIA principles in line with existing FAIS requirements to ensure the safekeeping of all Data by the Company and Persons/ Employees/ Parties (as applicable). This Policy applies to all Data obtained via products, services, websites, events operated by the Company or by any other means.

3. DEFINITIONS

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.

Processing: Any use by any means of a Data Subject’s Information.

4. THE 8 POPIA PRINCIPLES

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

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).

1

1

Risk Warning: Trading is Very Speculative and Risky.

Trade Markets brand name is owned and operated by Astrix Data (PTY) LTD, Registration number: 2020/814032/07, an FSP regulated by FSCA, with license number: 52313.

E-mail: support@trade-markets.co.za



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.

5. PRACTICAL IMPLICATIONS OF THE POPIA DATA PROTECTION PRINCIPLES

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

Information purpose:

The type of Information the Company collects will depend on the purpose for which the Data is collected and used. The Company 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 Company 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 Company 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 terms of Law or if the Company believes in good faith that the Law requires disclosure thereof.
- The Company'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 Company, and the instances in which it may be refused.

2

2



Collection of Information:

General:

The Company 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 Company must inform Data Subjects which information they are legally required to provide to the Company and which information is optional.

With the Data Subject's consent, the Company 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 Company to render suitable and proper services to Data Subjects.

As part of our business, we collect personal data from customers and potential customers that include the following:

- Name, Surname and contact details.
- Date of birth and gender
- Information about your income and wealth (assets and liabilities, account balances, trading, tax and financial statements)
- Profession and employment details
- Location data
- Knowledge and experience in trading, risk tolerance and risk profile
- IP address, device specifications and other information relating to your trading experience.
- Bank account, e-wallets, and credit card details
- Details of your visits to our Website or our Apps including, but not limited to, traffic data, location data, weblogs, and other communication data.

We use cookies to store and collect information about your use of our Website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our Website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience. You can find out more about our cookies on our "Cookies Policy" available on our Website.

We also keep records of your trading behavior, including a record of:

- Products you trade with us
- Historical data about the trades and investments you have made, including the amount invested
- Your preference for certain types of products and services

We are required by law to identify you if you are opening a new account or adding a new signatory to an existing account. Anti-money laundering laws require us to request, verify and record details of certain documents (i.e., photographic, and non-photographic documents) to meet the standards, set

3

3

Risk Warning: Trading is Very Speculative and Risky.

Trade Markets brand name is owned and operated by Astrix Data (PTY) LTD, Registration number: 2020/814032/07, an FSP regulated by FSCA, with license number: 52313.

E-mail: support@trade-markets.co.za



under those laws. Identification documentation, as required under anti-money laundering legislation or other legislation relevant to the services we provide to you, which includes but not limited to:

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

If you are a corporate client, we are required to collect additional information which includes but not limited to:

- Corporate documents such as Registration Certificate, Registers;
- Source of funds;
- Activity/ies involved in;
- Jurisdictions regulated or active in;
- Shareholders, directors, officers, beneficial owners including additional personal information on the Beneficial Owners, Shareholders and Directors.

We have the right to ask any additional information we deem necessary to be compliant with our legal and regulatory requirements.

We obtain this information in several ways through your usage of our services, products, websites, the account opening applications, our demo sign up forms, webinars, sign up forms, website cookies and similar tracking technology built into our Websites and Apps, subscribing to news updates and from information provided in the course of our ongoing relationship.

We may also collect this information about you from third parties either through bought-in third party marketing lists, publicly available sources, social media platforms, introducing brokers and affiliates, bankers and credit card processors, subscription-based intelligence databases and other third-party associates.

We may ask for other personal information voluntarily from time to time (for example, through market research, surveys, or special offers). If you choose not to provide the information, we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.

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

4
4



certain additional categories of information as a result of using/ receiving financial services, purchasing financial products, and using websites and related services. The Company will keep this information in a contact database for future reference, as needed.

Marketing:

The Company may use certain Information provided by Data Subjects to offer them further services that the Company 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 Company, IT may unsubscribe from the services or contact the Information Officer at the contact details provided above.

Usage and Web server logs:

- The Company may track information about a Data Subject's usage and visits on the Company's website (<http://trade-markets.co.za>). This Information may be stored in usage or web server logs, which are records of the activities on the Company's services, products and/or sites. The Company'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;
 - Name of the Data Subject's the unique Internet Service Provider
 - The city, state, and country from which a Data Subject accesses the Company's website
 - The kind of browser or computer used;
 - The number of links clicked within the site; o The date and time of visits to the site;
 - The web page from which the Data Subject arrived on the Company's site;
 - The pages viewed on the site;
 - Certain searches/queries conducted on the site via the Company's services, products and/or websites.
- The information collected in usage or web server logs help the Company 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 Company's products and websites, the Company 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 Company uses to store limited information about the Data Subject's use of the services, products or website.
- The Company 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 Company's services, products or website content. Without cookies, this functionality would be unavailable.

Obtaining Your Consent

We may process your personal data for one or more lawful bases of processing ("Lawful Basis") depending on the specific purpose for which we are using your data.

5
5



The Lawful basis are the following:

- to perform our contractual obligations towards you
- to be compliant with the legal and regulatory requirements
- to pursue our legitimate interests

Where our use of your personal information does not fall under one of these three Lawful basis, we will require your consent. Such consent shall be freely given by you and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice or by unsubscribing from email lists.

We may use personal data, provided by you , through our website or otherwise and personal data provided, during our business relationship to communicate with you for marketing promotional purposes, to provide you with the latest market news and analytical reports. The channels used for such communications may include calling you, sending emails, notifications through your online account portal and sms notifications including push notifications.

You have the right to opt out by using your online account portal or by sending an email to customer support: support@trade-markets.co.za by using the registered email address you disclosed to us, in case you do not have access to your online portal account, or one has not been provided to you for any reason.

Management of your Personal Information

We are committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organizational measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

We require organizations outside the Astrix Data (PTY) LTD who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all relevant data protection laws and this privacy notice.

In brief, the data protection measures we have in place are the following:

- we train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals
- requiring our employees to use passwords and two-factor authentication when accessing our systems;
- we apply Chinese walls and employees only have access to the personal data required for the purposes of the tasks they handle.
- we apply data encrypting technologies during data transmission during internet transactions and client access codes transmitted across networks
- employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses entering our systems;
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- practising a clean desk policy in all premises occupied by us and our related bodies corporate and providing secure storage for physical records; and

6

6

Risk Warning: Trading is Very Speculative and Risky.

Trade Markets brand name is owned and operated by Astrix Data (PTY) LTD, Registration number: 2020/814032/07, an FSP regulated by FSCA, with license number: 52313.

E-mail: support@trade-markets.co.za



- employing physical and electronic means such as access cards, cameras and guards to protect against unauthorised access.

Retaining of Information:

- The Company 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.
- When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time as per our legal requirement. For example, we are subject to investment services and anti-money laundering laws which require us to retain copies and evidence of the actions taken by us in regard to your identity verification, sources of incomes and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulatory code of conduct throughout the business relationship. These records must be maintained for a period of seven (7) years after termination of our business relationship with you or as per directive of a regulator or supervisory body.
- Personal data provided by you, as a prospective client during account opening registration, will be maintained for five (5) years unless it is required by the law, to keep it for a prolonged period of time, in the event that the registration was deemed incomplete or the account opening application was rejected.
- Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

The data that we collect from you may be transferred to, and stored at, an outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or Affiliate companies. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

When we transfer your data to other third parties outside the EEA, we may in some cases rely on applicable standard contractual clauses, binding corporate Legislations and directives issued, the EU-US Privacy Shield, or any other equivalent applicable arrangements. If you would like a copy of such arrangements, please contact us using the contact details below.

Correcting/ Amending/ Updating/ Deletion of Information:

- Data Subjects are required to inform the Company should there be any changes to the Information kept by the Company.
- A Data Subject may request the Company to correct, amend, update or delete its Information at any time when applying or making use of any financial products or services of the Company, by contacting the Information Officer at the contact details provided above.
- The Company will take all reasonable steps to confirm the Data Subject’s identity before making changes to Information.

7
7



Information Security:

- The Company will take all reasonable precautions to protect Information from loss, misuse, unauthorized access, disclosure, alteration and destruction.
- The Company 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 Company may disclose Information of a Data Subject or Information about a Data Subject's usage of the Company's financial services, financial products, websites or mobile applications to unaffiliated third parties as necessary to enhance services, financial product experience to meet the Company'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 Company has implemented appropriate security measures to help protect Information against accidental loss and from unauthorized access, use, or disclosure. The Company 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 Company may also store and process Information in systems located outside the Company's premises or the Data Subject's home country. However, regardless of where storage and processing may occur, the Company 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 Company'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 Company is legally obliged to provide adequate protection of Information, hold and prevent unauthorised access and use of Information, The Company is therefore committed to ensure that all Information of the Data Subject will be kept safe and secure and not be disclosed to any unauthorized third parties, without the consent of the relevant Data Subject.
- The Company 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 Company takes reasonable steps to protect Personal Information, which is held in a firewalled server. The Company can however not guarantee the security of information transmitted to it electronically from Data Subjects and they do so at their own risk. The Company maintains administrative, technical and physical safeguards to ensure protection of information against loss, misuse or unauthorized access, disclosure, alteration or destruction of the information provided to the Company by the Data Subject or you're the Data Subjects employer. The Company 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 Company's best endeavors to ensure protection of

8

8

Risk Warning: Trading is Very Speculative and Risky.

Trade Markets brand name is owned and operated by Astrix Data (PTY) LTD, Registration number: 2020/814032/07, an FSP regulated by FSCA, with license number: 52313.

E-mail: support@trade-markets.co.za



information. Where the Data Subject is located in another country with other data protection/privacy laws, the Company 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 Company's best endeavor's to ensure protection of Information. By providing information to the Company, the Data Subject consents to these transfers.

Your Rights

Please note that these rights do not apply in all circumstances. You are entitled to:

- a) request access to your personal data (commonly known as a "data subject access request");
- b) request correction of the personal data that we hold about you;
- c) request erasure of your personal data. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- d) object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- e) request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful, but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- f) request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information (i.e. not to hard copies) which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- g) withdraw consent at any time where we are relying on consent to process your personal data. Please complete the personal data request by email using the registered email address you disclosed to us, to the following email address: support@trade-markets.co.za.

We try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.