

PRIVACY POLICY

Velocity Trade Financial Services (Pty) Ltd (“**Velocity**” “**us**” or “**we**”) is deemed to be a responsible party in terms of the Protection of Personal Information Act 4 of 2013, as amended, consolidated or re-enacted from time to time, including all schedules and regulations thereto (“**the POPI Act**”), and Velocity is obliged to comply with the provisions of the POPI Act.

This Privacy Policy forms part of the client agreement (“**the Client Agreement**”) entered into between Velocity and you upon successful completion of the online application submitted by you to Velocity by means of the website on which the Privacy Policy is allocated (“**the Website**”). In this Privacy Policy “**the Client**”, “**you**” or “**your**” refers to you, being the person completing and submitting the online application on the Website. Terms defined in the Client Agreement shall bear the corresponding meaning herein.

This Privacy Policy sets forth our policy with respect to the information, including personally identifiable information (“**Personal Information**”), which is collected from the Client. Personal Information may include any of the following –

- a) information relating to 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 a 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 of preferences of the person;
- f) correspondence sent by a person that is implicitly or explicitly of a private or confidential nature of further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about a person; and

- h) the name of a person if it appears with other personal information relating to a person or if the disclosure of the name itself would reveal information about the person.

Velocity recognizes and respects the importance of maintaining the privacy of your Personal Information and established this Privacy Policy as a result. Please read this Privacy Policy carefully as it includes important information regarding your Personal Information.

This Privacy Policy is incorporated into the Client Agreement which governs your use of the Website and your relationship with Velocity. The Client Agreement can be found on the Website and has been signed by you on submission of our online application.

If you have any questions or concerns, please do not hesitate to contact us at the details provided below under the heading "Contact Us".

THE INFORMATION WE COLLECT

- **Personal Information**

You do not have to give us personally identifiable information ("**Personal Information**") in order to visit our Website. If, however, you wish to become a client of Velocity, you will be required to supply us with information, including but not limited to, your name, surname, email, phone number and/or physical address. If we collect Personal Information from you, you are giving us permission to use that information for the specific purpose as set out in the Client Agreement for which it is provided.

- **Non-Personal Information**

When you interact with the Website, we automatically collect certain personally non-identifiable information ("**Non-Personal Information**"). The Non-Personal Information we collect includes without limitation, your Internet Protocol ("**IP**") address, domain name of your internet service provider, your approximate geographic location, a record of the site pages that you visit, the time of your visits and aggregated Personal Information that cannot be used to specifically identify you. Such information, which is collected passively using various technologies is strictly for statistical purposes and to determine the visitor traffic patterns through the Website and cannot, in and of itself, be used to specifically identify you.

- **Cookies**

In operating the Website, we use a technology called “**Cookies**”. Cookies are small text files that provide Non-Personal Information to us regarding the visitors to our Website. Our Cookies provide additional functionality to the Website and assists in personalising your online experience. It further helps us analyse the Website usage more accurately and allows us to gauge the areas that are of the most interest to our visitors. None of our cookies contain any of your personally identifiable information.

Because you are using our Website we assume that you are happy for us to use cookies in this way. If you are not happy, then you should either not use the Website or set your web browser to not accept cookies from Velocity or use your web browser’s anonymous browsing setting (this is called ‘Incognito’ in Google Chrome, ‘InPrivate’ in Internet Explorer and ‘Private Browsing’ in Firefox).

- **Aggregated Personal Information**

In an on-going effort to better understand and serve the users of the Website, Velocity often conducts researches on its customer demographics, interests and behaviour based on Personal Information and other information that it collects. This research may be compiled and analysed on an aggregate basis and this aggregate information is strictly for statistical purposes and does not identify you personally and therefore is considered and treated as Non-Personal Information under this Privacy Policy.

OUR DISCLOSURE OF INFORMATION THAT WE COLLECT

Velocity is not in the business of selling or supplying your Personal Information to any third parties. We consider this information to be required to enable us to provide the services offered to Clients.

Subject to your consent, we will share your Personal Information with the introducing broker or referral agent who referred you to us for concluding the Client Agreement and opening an account with us. We will provide the introducing broker or referral agent with access to your Personal Information by means of a broker portal on the Website. The introducing broker or referral agent, as the case may be, will access your Personal Information for the purpose of confirming the Transactions which you conclude by means of the Trading Platform. This is

necessary for the introducing broker or referral agent to verify the fees payable to them in respect of the referral made to us.

There are, however, certain circumstances in which we may disclose, transfer or share your Personal Information with certain third parties without your consent, as set forth below:

- **Business Transfers**

In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Information may be part of the transferred assets. We may also share your Personal Information with our subsidiaries and/or affiliates for purposes consistent with this Privacy Policy and legislation regulating the use of personal information. Our subsidiaries and affiliates will be bound to maintain that Personal Information in accordance with this Privacy Policy.

- **Agents, Consultants and Related Third Parties**

Velocity sometimes engages other companies to perform certain administrative and/or business-related functions which, *inter alia*, include maintaining the database and communications network and processing and facilitating payments. When we engage another company to perform such functions, we may provide them with information, including your Personal Information, in connection with their performance of such functions.

- **Legal Requirements**

Velocity may disclose your Personal Information if required to do so by law or in the good faith belief that such action is necessary (i) to comply with a legal obligation, (ii) to protect and defend the rights or property of Velocity, or (iii) to protect Velocity against legal liability.

- **Non-Personal Information**

As Non-Personal Information cannot be used to personally identify you, Velocity may disclose, transfer or share Non-Personal Information for any lawful purpose.

HOW TO PROTECT THE INFORMATION WE COLLECT

Velocity has put in place certain measures to ensure the security of the Personal Information we collect and to secure the correct use thereof. These measures are appropriate to the nature of the information provided to us and prevent unauthorised access. We take reasonable steps to ensure the reliability of our own staff and ensure that any person who processes information on our behalf achieves the same high standards that we set ourselves and limit their access to your Personal Information to what is necessary in order for them to perform their responsibilities. Our security measures include the use of software firewalls, encryption and intrusion detection systems. We store all transaction information on secure computers located in locked data centres to which only selected employees have access. We will ask for your express permission before we use your Personal Information for any purpose not disclosed above.

Velocity takes what it believes to be reasonable steps to protect the Personal Information provided via the Website from loss, misuse, unauthorized access, inadvertent disclosure, alteration, and destruction. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our Website and any such transmission is at your own risk.

REQUEST FOR ACCESS FOR PERSONAL INFORMATION

The Client shall, having provided adequate proof of his/her identity, be entitled to –

- submit a request in writing to Velocity to confirm, free of charge, whether or not Velocity holds Personal Information about the Client; and
- request from Velocity the record or a description of the Personal Information about the Client held by Velocity, including Personal Information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information at a reasonable fee charged by Velocity within a reasonable time from the date of receipt of such request.

PRIVACY LAWS

Use of the Website and any electronic transaction concluded with Velocity are governed by the laws of the Republic of South Africa. If the Client accesses this Website from locations

outside of the Republic of South Africa, that Client is responsible for compliance with all local laws.

CHANGES TO PRIVACY POLICY

The Website and/or any other information displayed on the Website may change from time to time. As a result, at times it may be necessary for Velocity to make changes to the Website and this Privacy Policy. Velocity reserves the right to update or modify its Website and this Privacy Policy at any time and without prior notice to you. We will request your consent should any update or modification of the Website or Privacy Policy adversely affect your rights set out herein.

Please review this Privacy Policy periodically and especially before you provide any Personal Information to us. Your continued use of the Website, after any changes or revisions thereto or to this Privacy Policy, shall indicate your agreement with the terms of such revised Privacy Policy.

HYPERLINKS

Our Website may contain links to and from the websites of our advertisers and/or affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please familiarise yourself with these policies before you submit any Personal Information to these websites.

CONTACT US

Please feel free to contact us if you have any queries regarding Velocity' Privacy Policy. We confirm our contact details are as follows:

- Physical address: 200-on-Main, 200 Main Road, Claremont, Cape Town
- Telephone: on (021) 200 8800 during 0830 to 1700 on Monday to Friday
- E-mail: at support@za.velocitytrade.com