

## TradingPro Privacy Policy

The provision of services by TradingPro International Pty Ltd (Company Registration Number: 2014/202132/07), a licensed financial service provider regulated by the Financial Sector Conduct Authority of South Africa holding licence number FSP49624 and with its registered office at 3 Clive Court Ground Floor, 169 Lancaster Grove, Parkhill, Durban, 4319 South Africa (hereinafter referred to as "we", "our", "us" or "TradingPro") to you (hereinafter referred to as the "Customer", "you" or "your") is subject to our Client Agreement and this Privacy Policy which forms part of our Client Agreement.

We value your privacy and this Privacy Policy informs you of your choices and our practices regarding any Personal Data you provide to us or that you generate through your use of our services ("our services"), including (i) our Forex trading platform accessible at <https://www.tradingpro.com/> ("Platform" or "our Platform"); and (ii) any other site, platform, mobile application or other service facilitated by us.

### 1. SCOPE OF THIS PRIVACY POLICY

This Privacy Policy applies to our services and is incorporated into and forms part of the abovementioned Client Agreement ("Agreement") that you have agreed to in order to use our services. Any terms used in this Privacy Policy will have the same meaning as the equivalent defined terms in the Agreement, unless otherwise defined in this Privacy Policy or the context requires otherwise. Please note that:

- this Privacy Policy does not apply to Personal Data collected through third-party services (including any third-party websites or mobile apps) that you may access through our services;
- in providing our services, we may collect, use, disclose and retain your Personal Data;
- we share your Personal Data with our affiliates, business partners and service providers in order to provide our services to you, to carry out our obligations and enforce our rights, and to carry out our business (as set out in the "Sharing of Your Personal Information" section below).
- you have rights that you may exercise in relation to your Personal Data and you may exercise these rights by contacting us through the methods set out in the "Your Rights" section below.

Kindly read this Privacy Policy carefully as it is important for you to understand how we collect and use your Personal Data and how you may control it. By using our services, you agree that we may collect, use and process your Personal Data in accordance with this Privacy Policy, as revised from time to time. If you do not agree with this Privacy Policy, you must not use our services.

## 2. CHANGES TO THIS PRIVACY POLICY

We may from time to time, at our sole and absolute discretion, revise or add specific instructions, policies and terms to this Privacy Policy where such revisions, instructions, policies and terms shall form part of this Privacy Policy. Where there are any changes to this Privacy Policy, we will notify you (via our website, direct communication to you, or any other means that we deem appropriate). You agree that by continuing to use our services after any changes to this Privacy Policy, you are agreeing to the revised Privacy Policy.

## 3. THE INFORMATION WE COLLECT AND HOW WE COLLECT IT

In providing our services, we collect and process the following information relating to you:

**“Personal Data”**, such as any data or information, whether true or not, which is about an individual who can be identified (i) from that data; or (ii) from that data and other information to which we have or are likely to have access and would include data in our records as may be updated from time to time. Personal Data we collect and process include Identity Data, Contact Data, Biometric Data, Device Data, Location Data, Log Data, Marketing and Communications Data, Financial Data and Other Data;

**“Identity Data”**, such as your name, gender, date of birth, identification or passport number, tax number, nationality, identity document or passport, driving licence, utility bill and such other information or documents as may be required by us to comply with our regulatory obligations and to verify your identity to allow you to use our services;

**“Contact Data”**, such as residential address, mailing address, email address, phone numbers and fax number;

**“Biometric Data”**, such as facial images when you upload image or video of yourself when using our services;

**“Device Data”**, such as the computer or mobile device you use to access our services, including the hardware model, operating system and version, unique device identifiers, and mobile network information;

**“Location Data”**, such as information regarding your location (when you use location-enabled services), including the location of your device when you use our services, such as from the GPS, WiFi, compass, accelerometer or other sensors in your device;

**“Log Data”**, such as technical information that is automatically collected when you use our services, including (a) technical information such as your mobile carrier, configuration information made available by your device, web browser or other programs you use to access our services, your IP address, mac address and your device’s type, model, version and identification number; and (b) information about your use of our services;

**“Marketing and Communications Data”**, such as your preferences in receiving marketing information from us, our affiliates, business partners and service providers, and your communication preferences;

**“Financial Data”**, such as your deposit and withdrawals, trade records, credit/debit card details, bank account details, payment information, details about your transactions made on our Platform and financial information provided by you or that we collect from public sources; and

**“Other Data”**, such as information relating to your trading experience, education, source of income, investment aims and appetite, occupation, employer and employment position, annual income, investment portfolio, total cash and liquid assets and other details or questions as may be required for us to allow you to use our services and the required information may be amended by us from time to time to meet regulatory requirements.

You must only submit Personal Data which is accurate and not misleading and you must keep it up to date and inform us of any changes to the Personal Data you have provided to us. We shall have the right to request documentation to verify the Personal Data provided by you as part of our customer due diligence processes. We disclaim any liability for failure to provide services to you (or limit your use of our services) if you fail to ensure that your Personal Data submitted to us is complete and accurate. You may access and update your Personal Data submitted to us at any time by contacting us using the details set out in the “Contact Us” section below.

#### **4. HOW WE USE YOUR PERSONAL DATA**

We may use your Personal Data for any of the following purposes:

- to provide our services to you;
- to consider and process your transaction or communications with third parties via our services, which include but not limited to:
  - introducing brokers and agents;
  - business partner or providers;
  - any person acting on your behalf, including your financial adviser, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
  - your employment referee; and
  - credit reporting agencies;
- for identification, verification, due diligence, or know-your-customer purposes;
- to respond to, process, deal with or complete a transaction and/or to fulfil your requests for certain products and services and notify you of service issues and unusual account actions;
- to enforce our Agreement or any applicable end-user agreements, merchant agreements and/or license agreements;
- for customer service, security, fraud-detection, archival and backup purposes in connection with the provision of our services;
- to better understand how you access and use our services, for the purposes of trying to improve our services and to respond to customer desires and preferences,

including language and location customisation, personalised help and instructions, or other responses to your and other clients' usage of our services;

- to carry out due diligence or other screening activities (including, without limitation, background checks) in accordance with legal or regulatory obligations or our risk management procedures that may be required by law or that may have been put in place by us;
- to audit our services and business;
- to prevent or investigate any actual or suspected violations of our Agreement, fraud, unlawful activity, omission or misconduct, whether relating to your use of our Services or any other matter arising from your relationship with us;
- to respond to any threatened or actual claims asserted against us;
- to store, host, back up (whether for disaster recovery or otherwise) of your personal data, whether within or outside of your jurisdiction;
- to help us develop our new services and/or improve our existing services;
- software verification or administering software upgrades;
- our business and commercial transactions; and
- any other purposes which we notify you of at the time of obtaining your consent.

Please note that as the purposes for which we may collect, use, disclose or process your Personal Data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of the applicable data without your consent is permitted by the applicable laws or regulations.

If we rely on your consent for us to use your Personal Data in a particular way, but you change your mind, you may withdraw your consent by contacting us using the details set out in the "Contact Us" section below. Upon the receipt of such withdrawal notice from you, we will stop such use of your Personal Data. However, if you withdraw your consent, this may impact our ability to provide you with our services including but not limited to terminating your use of our services, suspending your use of our services or limiting your use of our services.

## 5. SECURITY PRACTICES

We utilize a comprehensive array of security technologies and procedures designed to prevent the loss, misuse, unauthorized access, or disclosure of your Personal Data. To safeguard your information, we employ Secure Socket Layer (SSL) technology for store and secure data transmission, alongside Advanced Encryption Standard (AES) protocols to ensure the highest level of data encryption at rest.

In addition, we have implemented firewall protection, intrusion detection systems, and state-of-the-art virus scanning technologies. Our network security is further strengthened by the use of Virtual Private Networks (VPN) to secure data transmission and Multi-Factor Authentication (MFA) to enhance user access control. Physical records are managed in adherence to a strict clean desk policy and are securely stored. To prevent unauthorized data recovery, obsolete data and electronic equipment are disposed of through secure destruction methods, such as shredding for paper records and degaussing for electronic media.

Moreover, our security infrastructure includes the deployment of Security Information and Event Management (SIEM) tools, enabling real-time analysis of security alerts generated by applications and network hardware. This comprehensive approach ensures that unauthorized access is prevented, viruses are thwarted, and Personal Data is protected, both digitally and physically.

We remain dedicated to upholding the highest standards of data security, continuously updating and improving our practices to navigate and stay ahead of emerging threats. Our unwavering commitment to the protection of your Personal Data is reflected in our rigorous security measures and the ongoing enhancement of our security protocols.

## **6. ADVERTISING**

In the event that we use your Personal Data for advertising purposes, we will do so in accordance with this section. We may use your Personal Data to try to offer advertising that is more relevant to you. We may also use your Personal Data for the purpose of sending you direct marketing information or materials (whether by messaging within our services or by

other means) that offer or advertise our products, services and/or the products and services of selected third parties including our affiliates, business partners and service providers.

We will honour your request for us to not use your Personal Data for the marketing purposes as described above. If you wish to make such a request, please: (a) contact us by using the details set out in the “Contact Us” section below; (b) follow the relevant instructions on our marketing communications; or (c) follow the instructions as set out in certain service-specific guidance (in relation to the relevant service).

Please note that we do not share your Personal Data with advertisers. We may, however, share Personal Data that cannot be used to identify you in aggregated, anonymised or pseudonymised form with advertisers for the purposes of trying to offer you advertising that is more relevant to you. For example, this may include sharing aggregated data on trading volumes for different currency pairs during certain times of the day or in response to specific economic announcements. This could help our advertisers understand when traders are most active and tailor educational content or trading tools accordingly.

## **7. SHARING OF YOUR PERSONAL DATA**

Unless permitted under this Privacy Policy or otherwise consented by you, we will not transfer your Personal Data to any third parties except our affiliates, business partners, service providers, introducing brokers and agents where such they may collect your Personal Data across our services.

Any collection and sharing of your Personal Data as permitted under the provision above or any other provisions of this Privacy Policy will only be used for the purposes of:

- providing our services to you;
- assisting us in carrying out the purposes set out under the “How We Use Your Personal Data” section above;
- carrying out our obligations and enforcing our rights under the Agreement or this Privacy Policy; and/or

- our businesses, including helping us to understand our users better and/or to improve our services.

Where we permit any third parties to collect and use your Personal Data in accordance with the provisions above, we will use reasonable efforts to ensure that such third parties only use your Personal Data: (i) in compliance with this Privacy Policy; and (ii) subject to any other instructions we give them, including any appropriate confidentiality and security measures that we implement. You hereby consent to the third-party use and sharing of your Personal Data as described in this "Sharing of your Personal Data" section.

Under specific circumstances, you agree that we may be required to retain, preserve or disclose your Personal Data to comply with any legal requirements, including:

- in order to comply with applicable laws or regulations or where we believe it is reasonably necessary to comply with the applicable laws or regulations;
- in order to comply with a court order or other legal process; and
- in response to a request by a government authority, law enforcement agency or similar body (whether situated in your jurisdiction or elsewhere).

## **8. COMMUNICATIONS FROM US**

We may from time to time send you notifications regarding changes or updates to this Privacy Policy through our website and our mobile app installed on your device (if applicable). If you no longer wish to receive these communications, you can do so by opting out of notifications at the website user account level or device level. In such cases, we may from time to time send you the relevant announcements by way of email when we consider it necessary to do so. You may not opt out of these communicational email announcements, which are not promotional in nature.

## **9. THIRD PARTY SERVICES ON OUR SERVICES**

Our services may include, or they may link you to, social media or other services (including websites) provided by third parties. For example, we may (whether in advertisements or otherwise within our services) provide you with links that allow you to access third-party



services or websites. Your use of any such third-party services, including any Personal Data you provide to such third parties, are subject to the relevant third party's terms of services and privacy policies and not our Agreement or this Privacy Policy, so please review their terms carefully. This Privacy Policy only applies to any Personal Data collected by us, does not apply to any Personal Data collected by such third parties or services offered by such third parties, and we bear no liability for any third-party use of any Personal Data provided by you to them.

## **10. RETENTION OF YOUR PERSONAL DATA**

We retain your Personal Data only if we need it to support justifiable business requirements or if required by the applicable laws. For example, we will only retain your Personal Data for as long as we have a business relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, or where we are required by law to retain it. Upon the expiry of time relating to any business needs or legal requirements to retain your Personal Data, we will take reasonable steps to ensure that your Personal Data is deleted or anonymised.

## **11. TRANSFER YOUR DATA OVERSEAS**

The servers hosting your Personal Data operate within our places of business and are governed by applicable local privacy legislation, as well as other pertinent privacy laws. By using our services, you hereby grant consent for the transfer of your Personal Data across international borders, as necessary for the purposes articulated in this Privacy Policy. This may involve transferring your data to countries whose privacy laws may not provide the same level of protection as those in your own jurisdiction. We will take appropriate measures to ensure that your Personal Data remains protected and secure in accordance with this Privacy Policy, regardless of where it is processed.

## **12. YOUR RIGHTS**

You have the right to request access to Personal Data that we hold about you, subject to certain conditions and limited exceptions set out in the applicable laws. If you wish to do so, please email your request to us by using the details set out in the "Contact Us" section below.

We will be as open as we can with you but sometimes we might not hold any Personal Data about you or may have to withhold Personal Data from you, but only to the extent we are allowed to do so under the applicable laws. For example, where the information is not Personal Data about you, is commercially sensitive, is legally privileged or relates to the Personal Data of another person, or disclosure of the information may have impact on the safety or security of our employees, clients or any person. In any of such circumstances, we may withhold the information requested by you and provide you with reason.

You have the right to ask us not to use your Personal Data for marketing purposes or any other purpose. You can exercise the right at any time by contacting us using the details set out in the “Contact Us” section below.

In addition, you may also have a right under the applicable laws to make other requests relating to your Personal Data. For example, you may have a right to:

- request an update to or correction of the record of your Personal Data maintained by us if it is inaccurate or out of date;
- request that we erase that data or cease processing it, subject to certain exceptions;
- receive your Personal Data in a structured, commonly used and machine-readable format, and transmit that data to another data controller without hindrance; and
- lodge a complaint with the appropriate data protection authority if you have concerns about how we process your Personal Data. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

If you wish to exercise any of the above rights, please make your request by using the details set out in the “Contact Us” section below.

### **13. CONTACT US**

If you wish to contact us regarding this Privacy Policy, please contact our Privacy Officer via email at [support@tradingpro.com](mailto:support@tradingpro.com).

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