info@fxnovus.com | www.fxnovus.com

POPIA POLICY

Version 1.0 – September 2026

1. Introduction

FXNOVUS (PTY) LTD (hereinafter referred to as the “Company” or “FXNovus”) is an investment firm based in South Africa and is authorised and regulated by the Financial Sector Conduct Authority (“FSCA”) of South Africa under FSP License Number 50963. The Company is also registered with the Companies and Intellectual Property Commission (“CIPC”) of South Africa. The Company is authorised by the FSCA to operate as a Financial Services Provider and to offer the services set out in the Account Opening Agreement available on the Company’s website. FXNovus conducts its activities in accordance with the Financial Advisory and Intermediary Services Act, 2002 (Act 37 of 2002) (“FAIS Act”).

This Privacy Statement applies to the website www.fxnovus.com, including all associated sub-domains and mobile applications that are owned, registered, or operated by the Company.

In its capacity as a Financial Services Provider and in compliance with the Financial Advisory and Intermediary Services Act, 2002 (Act No. 37 of 2002) (the “Law”), the Company has established this Protection of Personal Information Policy (the “Policy”). The Policy explains how the Company collects, records, stores, uses, manages, safeguards, and, where applicable, discloses Clients’ Personal Data.

This Policy applies to all employees of the Company and governs the manner in which Personal Data is handled within the organisation.

The Policy applies to current and prospective clients, former clients whose contractual relationship with the Company has ended, and visitors to the Company’s website and mobile applications (collectively referred to as the “Clients” or “you”). It applies whenever Clients access or use the Company’s websites, mobile applications, or other digital platforms (collectively referred to as the “Platforms”).

The Company is committed to safeguarding the privacy and confidentiality of all Personal Data that it processes. Such processing is carried out in accordance with applicable international information protection principles, the Constitution of the Republic of South Africa, 1996, the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) (“POPIA”), this Policy, and the Company’s Terms of Business.

For the purposes of this Policy, “Personal Data” means any information that identifies, or could reasonably be used to identify, a Client. This may include, but is not limited to, the Client’s name, residential or postal address, identification number, telephone number, and date of birth.

2. Collection of Personal Data

The Personal Data provided by Clients, and collected and processed by the Company, is used for purposes including communication, identification, verification, assessment, establishing and maintaining the business relationship with the Client, performing contractual obligations, and complying with applicable legal and regulatory requirements.

Depending on the nature of the products or services provided by the Company, the following categories of Personal Data may be collected and processed:

- Contact information, including the Client’s name, email address, telephone number, and other relevant contact details.
- Identification information, including the Client’s identity document or passport number and other information required to verify the Client’s identity.

- Biographical and demographic information, including gender, age, ethnicity, education, occupation, financial and trading experience, and information regarding whether the Client holds a prominent public function or is classified as a Politically Exposed Person ("PEP").
- Financial information, including income details, bank account numbers and banking information, tax-related information, and other information concerning the Client's financial circumstances.
- Information relating to the services provided by the Company, including details of the Client's transactions and records of communications and interactions between the Client and the Company.
- Website and technical information, including information relating to visits to the Company's website and data collected through cookies and other tracking technologies. This may include the Client's IP address, domain name, browser type and version, operating system, device information, and approximate geolocation.
- Information concerning criminal convictions and offences, where the collection and processing of such information is required or permitted under applicable law.
- Mobile device information, including call-log information, where the Client has provided the necessary consent or permission for such information to be accessed.
- Marketing preferences, including the Client's preferences regarding receiving marketing communications, promotional materials, and other relevant information from the Company.

3. No Collection of Children's Personal Data

The Company recognises the importance of protecting the privacy and personal information of children. The Company's products and services are not intended for individuals under the age of eighteen (18), and its website and Platforms are not designed or intended for use by children.

Accordingly, the Company does not knowingly or intentionally collect Personal Data relating to children under the age of eighteen (18). If the Company becomes aware that it has inadvertently or unintentionally collected Personal Data belonging to a child, it will take reasonable steps to delete such information as soon as reasonably practicable after becoming aware of the collection.

If a Client becomes aware that the Company may have inadvertently collected Personal Data relating to a child, they should notify the Company at **support@fxnovus.com**.

4. Use of Personal Data

The Company collects and processes Personal Data where such information is necessary to assess, establish, administer, and maintain its contractual relationship with the Client. Personal Data may also be processed where necessary to comply with this Policy and with applicable laws, regulations, regulatory requirements, and obligations governing the provision of financial services.

In certain circumstances, the Company may process a Client's Personal Data where this is necessary to pursue the Company's legitimate interests or the legitimate interests of a third party. Such processing will only take place where those interests are not overridden by the Client's interests, fundamental rights, or freedoms.

The Company will generally use and process the Client's Personal Data in the following circumstances:

A) Performance of a Contract and Pre-Contractual Requirements

The Company may process Personal Data where such processing is necessary to enter into a contract with the Client, take steps at the Client's request before entering into a contract, or fulfil the Company's contractual obligations.

This processing may be necessary to provide the Client with the Company's products and services and, in particular, to:

- Verify the Client's identity and conduct any credit or other checks that may be required.
- Determine whether the Client satisfies the applicable eligibility and suitability requirements for the Company's products and services.
- Open, administer, and manage the Client's account with the Company.
- Process and administer the Client's transactions.
- Provide the Client with transaction-related information, confirmations, statements, and post-transaction services or support.

Where the Client fails or declines to provide Personal Data that is required for these purposes, the Company may be unable to establish or maintain the contractual relationship and may therefore be unable to provide the Client with certain products and/or services.

B) Where the Company is Required to Comply with a Legal Obligation

As an investment firm, the Company is subject to various legal, regulatory, and statutory obligations that may require the collection and processing of Clients' Personal Data. Such obligations may include, among other things, verifying the identity of Clients, complying with court orders and legal proceedings, fulfilling tax and regulatory reporting requirements, and implementing anti-money laundering ("AML") and related compliance measures.

The Company may therefore process Personal Data where such processing is necessary to fulfil its legal and regulatory obligations or to comply with requests or requirements issued by competent authorities.

C) Where the Company Has a Legitimate Interest in Processing the Client's Personal Data

The Company may process a Client's Personal Data where such processing is necessary to pursue the Company's legitimate business interests, provided that such interests do not override the Client's rights, freedoms, or legitimate interests.

In particular, the Company may process Personal Data for the following purposes:

- To develop, improve, modify, or enhance the Company's products and services.
- To protect and strengthen the security of the Company's networks, systems, platforms, and information.
- To detect, prevent, investigate, and address fraud, unlawful activities, unauthorised transactions, and other forms of misconduct, as well as to identify and manage potential risks and liabilities.
- To maintain accurate and appropriate business, financial, and operational records.

- To administer and manage the Company's business activities and ensure compliance with its internal policies, procedures, and controls.
- To investigate, establish, defend, or pursue legal claims, disputes, or proceedings.
- To obtain professional services and advice from appropriately qualified third parties, including legal, financial, accounting, or other professional advisers.
- To analyse statistical and other aggregated information in order to better understand Client behaviour and preferences and to improve the Company's products, services, and customer experience.

Where statistical information is generated from Clients' Personal Data, the Company will take reasonable steps to anonymise and aggregate such information so that it does not directly or indirectly identify individual Clients. The Company may share such anonymised and aggregated statistical information with third parties, as further described in Section 8 of this Policy, for legitimate statistical, analytical, business development, and marketing purposes, including improving the effectiveness of the Company's marketing activities.

D) Where the Client Has Provided Consent

In certain circumstances, the Company will request the Client's consent before processing Personal Data for specific purposes.

In particular:

- The Company may request the Client's consent to send marketing communications relating to the Company's products, services, promotions, or other offerings that may be relevant or of interest to the Client.
- The Company may request the Client's permission to access information contained in the call log of the Client's mobile device, solely where necessary to complete the telephone number verification process.

The Client has the right to withdraw any consent previously provided at any time. Withdrawal of consent will not affect the lawfulness of any processing carried out on the basis of that consent before it was withdrawn.

5. Cookies

A cookie is a small text file that is placed and stored on a user's computer or other device for record-keeping and functionality purposes. The Company uses cookies on its website(s) to support website functionality, improve the user experience, and collect information about how the website is used.

The Company does not associate information stored through cookies with Personal Data provided by a Client when accessing or using the Company's website(s), except where such association is permitted or required for legitimate operational, security, or legal purposes.

The Company uses both session cookies and persistent cookies. Session cookies are temporary and are generally removed when the Client closes their internet browser. Persistent cookies remain stored on the Client's device for a longer period and may be used to recognise returning users and retain certain preferences.

Clients may delete or manage persistent cookies by adjusting the settings of their internet browser. Instructions for doing so are generally available through the browser's "Help" function or settings menu.

The Company may use persistent cookies for statistical and analytical purposes. These cookies may also assist the Company in understanding users' interests, preferences, and general website usage patterns, enabling the Company to improve the functionality, content, and overall experience of its website(s) and services.

Clients who choose to reject or disable cookies may continue to access certain areas of the Company's website(s). However, disabling or rejecting cookies may prevent the Client from accessing certain functionalities, including the client portal and the ability to complete and submit an online application form.

Certain third-party business partners or service providers of the Company may also place cookies on the Company's website(s). The Company does not control these third-party cookies and does not have access to or responsibility for the information collected through such cookies. Clients are encouraged to review the relevant privacy and cookie policies of such third parties for further information.

6. Cookie Analysis

The Company uses both persistent and session cookies to support and improve the browsing experience of visitors and Clients and to enable specific functionality across its website(s) and Client Area.

The sections below provide further information regarding the types of cookies used by FXNovus, their purposes, and, where applicable, the available options for managing, disabling, or opting out of such cookies.

Cookie Category	Purpose
Required	To enable the core functionality for the website and user accessibility.
Functional	To maintain the user's authentication and personalization functions through our websites and client's area. To serve users with the appropriate content and resources based on their preferences.
Analytical	To track user's visit to our websites, identify their preferences and collect online behavioural data for analysis and optimization.

6.1 Third-Party Cookies

The Company's website(s) may use cookies provided by third-party service providers to enable certain tools and functionalities for visitors and Clients, as well as to support the Company's internal analytics, performance monitoring, and marketing activities.

The Company does not have access to or control over cookies placed or managed by third-party providers. Accordingly, to the extent permitted by applicable law, the Company shall not be responsible or liable for any misuse, unauthorised access, disclosure, or loss of Personal Data arising from third-party cookies that are beyond the Company's control.

Clients and visitors acknowledge that they can manage, restrict, disable, or delete cookies through the security, privacy, and cookie settings available in their internet browser.

For further information about cookies, including guidance on how to manage or delete them, please visit: www.allaboutcookies.org

7. Links to Other Websites

The Company's website(s) may contain links to third-party websites, applications, or social media platforms that may be of interest to Clients and visitors.

Once a Client or visitor uses such a link to leave the Company's website, the Company has no control over the external website or platform. Accordingly, the Company is not responsible for the privacy practices, security, content, or protection of any Personal Data that a Client or visitor may provide while accessing or using such third-party websites.

Third-party websites and platforms are not covered by this Policy. Clients and visitors should therefore exercise caution and review the applicable privacy policy and terms of use of any external website before providing Personal Data.

To the extent permitted by applicable law, the Company shall not be liable for any unlawful or unauthorised access to or use of a Client's Personal Data resulting from the misuse, malicious use, negligence, disclosure, loss, or misplacement of the Client's passwords or other access credentials, whether caused by the Client or by a third party.

8. Client Records and Retention Periods

The Company is required by applicable laws and regulatory requirements to retain certain records relating to its Clients and their activities with the Company.

Such records may include Personal Data, trading and transaction information, account-opening documentation, communications, and other information or documentation relating to the Client and the Company's business relationship.

The Company will retain such records for the period required by applicable laws and regulations, including, where applicable, for a period of six (6) years following the termination of the business relationship with the Client.

Where required or permitted by applicable law, the Company may retain certain information for a longer period where necessary to comply with legal or regulatory obligations, resolve disputes, establish or defend legal claims, or fulfil other legitimate purposes.

9. Sharing and Disclosure of Personal Data

In the course of fulfilling its contractual, legal, regulatory, and statutory obligations, the Company may disclose or provide access to Clients' Personal Data to third parties where such disclosure is lawful and necessary.

Where appropriate, the Company requires relevant third-party service providers to enter into contractual arrangements that impose appropriate confidentiality, data protection, and security obligations concerning the Personal Data they receive or access.

Depending on the circumstances, recipients of Clients' Personal Data may include:

- Third-party payment service providers, which assist the Company in facilitating secure deposits, withdrawals, payments, and other transactions involving a Client's account.
- Technology and other service providers, engaged to support the Company in delivering its products and services, including providers of technological expertise, software, infrastructure, solutions, and technical support.
- Governmental and regulatory authorities, including law enforcement agencies and the Financial Sector Conduct Authority ("FSCA"), where disclosure is required in connection with enquiries, investigations, proceedings, or the Company's legal and regulatory obligations.
- Credit reference and fraud prevention agencies, third-party identity and authentication providers, and other financial institutions, where necessary for credit assessments, identity verification, fraud prevention, risk management, and anti-money laundering ("AML") compliance.
- Third-party customer support providers, including service providers assisting with customer service and support functions.
- Live-chat and website analytics providers, which assist with customer communications and the monitoring and analysis of website visits, traffic, and usage through cookies and similar technologies.
- External professional advisers and consultants, including legal, tax, accounting, financial, and other professional advisers.
- Data reporting and processing service providers, where required to support the Company's reporting, data management, and operational activities.
- Market research companies and call centres, where engaged to conduct market research, customer surveys, communications, or related business activities.
- Affiliates and associated entities of the Company, where such disclosure is necessary for legitimate business, operational, regulatory, or service-related purposes and is permitted by applicable law.

Payment and Card Information Security

In accordance with applicable Payment Card Industry ("PCI") security standards and recommendations, payment-related information transmitted through the Company's systems is protected using appropriate security measures, including Transport Layer Security ("TLS") encryption and Advanced Encryption Standard ("AES") encryption with a 256-bit key, where applicable.

The Company does not collect, store, or directly process Clients' personal credit or debit card details. Payment transactions are processed through third-party payment gateway providers, which are responsible for handling payment card information in accordance with their own security and data protection obligations.

10. Business Transfers and Legal Requirements

If the Company becomes involved in a merger, acquisition, financing or due diligence process, reorganisation, bankruptcy, receivership, sale of assets, corporate restructuring, or the transfer of services to another provider, Clients' Personal Data and other relevant information may be transferred to the acquiring entity, successor, affiliate, or other relevant third party as part of the transaction.

Any such transfer will be carried out in accordance with applicable legal, regulatory, and data protection requirements.

11. Marketing Communications and Subscription Preferences

The Company may process Clients' Personal Data to provide information about its products, services, promotions, and other offers that may be relevant or of interest to the Client.

Where required by applicable law, the Company will only use Personal Data for direct marketing purposes where it has obtained the Client's explicit consent.

Clients who no longer wish to receive promotional or marketing communications may withdraw their consent or opt out at any time by following the unsubscribe or opt-out instructions provided in the relevant communication.

Clients may also manage their marketing and email subscription preferences through the relevant settings available within their Client account area, where such functionality is provided.

12. Personal Data Rights

Clients have certain rights in relation to the Personal Data that the Company collects and processes. These rights may be subject to applicable legal and regulatory requirements and certain lawful exceptions.

Right of Access

The Client has the right to request confirmation as to whether the Company processes their Personal Data. Where Personal Data is being processed, the Client may request access to such information and, where applicable, a copy of the Personal Data held by the Company.

Right to Rectification

The Client has the right to request that the Company correct, update, or complete any Personal Data that is inaccurate, incomplete, or outdated.

Right to Erasure

Under certain circumstances, the Client may request that the Company delete or remove their Personal Data. This may apply, for example, where the Client has withdrawn their consent and there is no other lawful basis for the Company to continue processing the Personal Data.

The right to erasure is not absolute and may be subject to circumstances where the Company is legally required or otherwise permitted to retain the relevant Personal Data.

Right to Restrict Processing

The Client may request that the Company restrict or limit the processing of their Personal Data in certain circumstances, including where:

- The Client believes that the Personal Data held by the Company is inaccurate and the Company is verifying its accuracy.
- The Personal Data has been processed unlawfully, but the Client prefers restriction of its use rather than deletion.
- The Company no longer requires the Personal Data for its original purposes, but the Client requires the information to be retained for the establishment, exercise, or defence of legal claims.
- The Client has objected to the processing of their Personal Data and the Company is in the process of determining whether it has legitimate grounds to continue such processing.

Right to Data Portability

Where applicable, the Client has the right to request the Personal Data they have provided to the Company in a structured, commonly used, and machine-readable format. Where legally applicable, the Client may also request that such information be transmitted to another organisation.

Right to Object

The Client may object to the processing of their Personal Data in certain circumstances.

Where the Company processes Personal Data on the basis of its legitimate interests, the Client may object where they have grounds relating to their particular circumstances, unless the Company can demonstrate compelling legitimate grounds for continuing the processing that override the Client's interests, rights, and freedoms.

The Client may also object at any time to the processing of their Personal Data for direct marketing purposes.

Rights Relating to Automated Decision-Making and Profiling

The Client has the right, where applicable, not to be subject to a decision based solely on automated processing, including profiling, where such decision produces legal or similarly significant effects on the Client.

This right may not apply where the automated processing is necessary for entering into or performing a contract with the Company, is authorised by applicable law, or is based on the Client's explicit consent, subject to applicable legal requirements.

Right to Withdraw Consent

Where the Company relies on the Client's consent as the legal basis for processing Personal Data, the Client may withdraw that consent at any time.

The withdrawal of consent will not affect the lawfulness of any processing carried out before the withdrawal was made.

Right to Lodge a Complaint

If a Client has concerns regarding the Company's privacy practices or the manner in which their Personal Data has been collected, used, stored, or otherwise processed, the Client may raise the matter with the Company or lodge a complaint with the relevant data protection or supervisory authority, where applicable.

To exercise any of the rights described above or to submit a privacy-related request, Clients may contact the Company at **support@fxnovus.com**.

13. Automated Decision-Making and Profiling

When a Client applies to open a trading account with the Company, the Company may use automated systems to assess the Client's knowledge, experience, and suitability in accordance with its regulatory obligations. This assessment may include an appropriateness test designed to evaluate the Client's level of knowledge and experience in relation to the relevant financial products and services.

The outcome of the assessment may be used to determine the appropriate leverage level applicable to the Client's trading account, in accordance with the Company's policies and applicable regulatory requirements.

Where an automated decision is made in relation to the Client, the Client may contact the Company to:

- Request information about how their Personal Data is processed and, where applicable, exercise the rights described in this Policy.
- Request that the automated decision or assessment be reviewed by a member of the Company's staff and request an explanation of the factors that contributed to the automated decision.
- Challenge the outcome of the automated decision and request a reassessment of their application.

Following such a request, the Company may conduct a human review of the Client's application, taking into consideration the factors and information that resulted in the automated decision as well as any relevant information, circumstances, or views provided by the Client.

14. Confidentiality and Security of Personal Data

The Company treats all Personal Data in its possession as confidential and will process and use such information only for the purposes described in this Policy or as otherwise permitted or required by applicable law.

Personal Data provided by a Client will be handled confidentially and may only be disclosed to the categories of third parties identified in Section 9 of this Policy, where such disclosure is necessary and lawful. The Company will not disclose a Client's Personal Data to any other third party unless such disclosure is required or permitted by applicable law, regulation, court order, or regulatory or legal proceedings.

Personal Data provided by a Client when registering as a user of the Company's website(s), opening an account, or accessing the Company's Services may be treated as "Registration Information." The Company applies appropriate technical and organisational measures to protect Registration Information against unauthorised access, loss, misuse, alteration, or disclosure.

Clients may access certain Registration Information through their account using a password selected by the Client. Where applicable, passwords are protected using appropriate security and encryption measures and are not accessible to the Company's personnel in their readable form. Clients are responsible for maintaining the confidentiality of their passwords and must take reasonable precautions to prevent their passwords or other account credentials from being disclosed or made available to unauthorised persons.

Registration Information is stored on secure servers and access is restricted to authorised personnel who require such access for legitimate business, operational, legal, or regulatory purposes. Access to these systems is protected through appropriate authentication and security controls.

The Company uses appropriate encryption and security measures when Personal Data is transmitted to or from its systems, with the aim of protecting such information against unauthorised access or interception.

Personal Data collected by the Company that does not constitute Registration Information is also stored on secure systems and is accessible only to authorised personnel through appropriate access controls. Such information may not be directly accessible to Clients through their account, and therefore Clients will not be provided with account credentials for accessing or modifying this information.

While the Company takes reasonable and appropriate measures to protect Personal Data, Clients acknowledge that no method of electronic transmission or storage can be guaranteed to be completely secure.

15. Amendments to This Policy

The Company reserves the right to review, update, or amend this Policy from time to time to reflect changes in its business practices, services, technology, legal requirements, regulatory obligations, or other relevant circumstances.

Where changes are made, the Company will publish the updated version of the Policy on its website(s). Where an amendment is considered material, the Company may also notify Clients through an appropriate communication channel, such as by placing a notice on its website or contacting Clients directly.

Clients are responsible for periodically reviewing this Policy to remain informed of any updates, amendments, or changes that may apply to the processing of their Personal Data.

The date of the most recent update may be indicated in the relevant version of the Policy published on the Company's website.

16. Enquiries and Contact Details

Clients and visitors who have general questions or enquiries regarding this Policy may contact the Company's Customer Support Department by email at **support@fxnovus.com**.

For enquiries concerning the Client's Personal Data, the exercise of any applicable data protection rights described in this Policy, or questions regarding how the Company collects, uses, stores, or otherwise processes Personal Data, Clients may contact the Company at **support@fxnovus.com**.

The Company will review and respond to relevant requests in accordance with applicable legal and regulatory requirements.

info@fxnovus.com | www.fxnovus.com

FXNOVUS (PTY) LTD

FXNOVUS (PTY) LTD is a South Africa Investment Firm, authorized and regulated by the Financial Sector Conduct Authority (FSCA) of South Africa, with FSP License Number 50963. FXNOVUS (PTY) LTD registration number is 2020 / 183344 / 07.

Registered Address: Nr 1 Casino Road, Foundershill, Office G31 Modderfontein Estate, Johanersburg, 1609 South Africa

Website: www.fxnovus.com

support@fxnovus.com