

ACLIVE WEALTH ADVISORY (PTY) LTD

PRIVACY POLICY

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INTRODUCTION

ACLIVE WEALTH ADVISORY (PTY) LTD is the company which owns and operates the brand “CIFMarkets” (the “Company”, “we”, “us”, “our”, “CIFMarkets”), found online at

ACLIVE WEALTH ADVISORY (PTY) LTD owns and operates the brand CIFMarkets. ACLIVE WEALTH ADVISORY (PTY) LTD is registered in South Africa with registration number 2022/427817/07, and is licensed and regulated by the FSCA (Financial Sector Conduct Authority) with an FSP license number 54857. The Company’s registered office is situated at 1 Hood Avenue, Rosebank, Johannesburg, Gauteng, 2196.

www.cifmarkets.com . ACLIVE WEALTH ADVISORY (PTY) LTD is registered in South Africa, with a registration number 2022/427817/07, regulated by FSCA (Financial Sector Conduct Authority) with a license number 54857 and registered address at 1 Hood Avenue, Rosebank, Johannesburg, Gauteng, 2196.

The Company is operating under the Section 8 of the Financial Advisory and Intermediary Services Act, 2002 (Act No.37 of 2002) (collectively the “Act and Applicable Regulations”).

This Privacy Policy (the “Policy”) outlines how the Company collects, maintains, uses and discloses personal information about the Client (the “User” or “Customer” or “Client” or “you”). This Policy applies to existing and potential users as well as to any visitors of the Company’s website(s).

The Company is committed to protecting the privacy of all personal data obtained, including information obtained during the user’s visits to the Company’s website.

As part of the Company’s daily business operations, it needs to collect personal information from clients and prospective clients in order to provide them with products and services and ensure that they meet their needs when provided with these products and services, as well as when providing them with the respective information.

The privacy of Clients is of utmost importance to the Company, and it is the Company’s policy to safeguard and respect the confidentiality of information and the privacy of individuals. In this respect, this Privacy Policy sets out how CIFMarkets collects, uses, processes and manages Clients’ personal information, whether received by them or by a third party in connection either with the provision of services or to the use of the Company’s services and/or its official website and/or any other related websites and applications including the Company’s Members Area.

The Privacy Policy is reviewed regularly to ensure that new obligations, updated to business operations and practices and regulatory changes are taken into consideration. Any personal information we hold will be governed by our most recent Privacy Policy.

In case of existing or former employees of the Company, or job applicants, or contractors, or third-party service providers, their personal information will be used in connection with their employment contract, or contractual relationship.

This Privacy Policy applies to the processing by the Company of the personal data provided by its clients/potential clients/ website visitors/ job applicants/ existing or former employees. This Policy does not apply to websites operated by any other organizations and/or third parties.

SAFEGUARING OF PERSONAL DATA

The Company respects and is committed to safeguarding the privacy of existing or prospective clients, applicants and website visitors. Any of the latter personal data is kept in accordance with applicable data protection laws and regulations.

In order to ensure the security of Client's information, the Company has taken all necessary and appropriate technical and organizational measures and procedures, including:

- Regular trainings to all of our employees on the importance of maintaining, safeguarding and respecting Clients' personal information and privacy.
- In case of a breach in individuals' privacy, the Company takes the matter seriously and imposes appropriate disciplinary measures, including dismissal where necessary.
- Classification of the personal information provided during registration as classified or registered information. The Client can access their registered information upon login by entering a username and a password. It is the Client's responsibility to ensure that said password remains private. Registered information is securely stored in a safe location, where only authorized personnel has access to.
- Personal information that is not classified as registered is also kept in a safe place and is only accessible by authorized personnel. All personal information is transferred to the Company and the Company takes its obligation to prevent third parties from accessing such information seriously.

Transmission of information online is not always secure. CIFMarkets takes serious precautions to protect Clients' personal data and applies procedures and security features to try to prevent unauthorised access.

PERSONAL DATA

During the account opening procedure, Clients are asked to complete and submit an application form with personal information, in order to comply with relevant rules and regulations. The information may also be used by the Company for marketing and services information purposes.

Such information includes:

- full name, residential address and contact details (e.g., email address, telephone number, fax etc.);
- date of birth, place of birth, gender, citizenship;
- information about your income and wealth, including details about your and source of funds, assets and liabilities, bank account information, trading statements, FATCA and CRS information and financial statements;
- trading account balances, trading activity, your inquiries and our responses;

- information on whether you hold a prominent public function (PEPs);
- profession and employment details;
- authentication data (e.g., signature);
- location data;
- trading performance, knowledge and experience;
- verification information, which includes information necessary to verify your identity such as a passport or driver's license (examples also include background information we receive about you from public records or from other entities not affiliated with us); furthermore, we may collect other identifiable information such as identification numbers and/or Passport/Tax registration numbers;
- any other information customarily used to identify you and about your trading experience which is relevant to us providing our services to you.

The Company also gathers information through the use of its services (websites, applications, account opening applications, demo sign-up forms, webinar sign-up forms, news updates subscriptions, customer service communications). The Company may also collect personal information from third parties and through publicly available sources. We also keep records of your trading behavior, including records regarding the following:

- products you trade with us and their performance;
- historical data about the trades and investments you have made including the amount invested;
- your preference for certain types of products and services.
- We may ask for other personal information voluntarily from time to time (for example, through market research or surveys).

If the Client chooses not to provide some information, the Company may not be able to provide with some products or services.

We may record any communications, electronic, by telephone, in person or otherwise, in relation to the services we provide to the Client and our business relationship with them. 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. Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

Unsolicited Personal Information

Where we receive personal information about an individual which is unsolicited by us and not required for the provision of our services, we will securely destroy the information (provided it is lawful and reasonable for us to do so).

Tracking systems used on the Company's website(s) may collect your personal data in order to optimise the services provided to clients/potential clients. The website collects information in the following ways:

- **Device information**

By recognizing your device used to access and use the Company's website(s), we can provide you with the most appropriate version of our website(s).

- **Log information**

Logging certain behaviors on the site enables the company to track user action and therefore troubleshoot any issues that may occur.

- **Location information**

Using your IP address helps us localize our website content, which we provide to you based on your country, and improve your user experience on our site(s).

- **Cookies**

Cookies are text files with a small amount of data sent from our website(s) to your browser and stored on your computer's hard drive. Cookies help us improve the performance of our website(s) and our website visitors' experience, track your referrer (if any) and improve our future advertising campaigns.

- **Local storage**

You must submit validation documents to us through the Company's Members Area in order to activate your trading account.

EMPLOYMENT APPLICATIONS

Personal data is kept in personnel files or within the Company's systems. We have a separate employee non-disclosure agreement for employees, which will be provided to you upon being recruited. The following types of data may be held by the Company, as appropriate, on relevant individuals:

- name, address, phone numbers, date of birth, email address, gender, marital status, etc.
- CVs and other information gathered during recruitment.
- references from former employers;
- National Insurance numbers;
- Criminal conviction data;
- job title, job descriptions and pay grades;
- conduct issues such as letters of concern and disciplinary proceedings;

- internal performance information;
- medical or health history/information;
- tax codes;
- terms and conditions of employment;
- training details.

We may further ask for other personal information as we may consider necessary for the purpose of recruitment.

If you are unsuccessful in obtaining employment, we will seek your consent to retaining your data in case other suitable job vacancies arise in the Company for which we think you may wish to apply. You are free to withhold your consent to this and there will be no consequences for withholding consent.

PROCESSING OF PERSONAL DATA

We may process your personal data on the following bases and for the following purposes:

Performance of a contract

We process personal data in order to provide our services and products, as well as information regarding our products and services based on the contractual relationship with our clients (i.e., so as to perform our contractual obligations). In addition, processing of personal data takes place to be able to complete our client on-boarding/acceptance procedures.

In view of the above, we need to verify your identity in order to accept you as our client and we will need to use those details in order to effectively manage your trading account with us to ensure that you are getting the best possible service from us. This may include third parties carrying out credit or identity checks on our behalf. The use of your personal information is necessary for us to know who you are as we have a legal obligation to comply with certain Know Your Customer and Customer Due Diligence regulatory obligations.

Compliance with a legal obligation

There are a number of legal obligations emanating from the relevant laws to which we are subject as well as statutory requirements (e.g., the anti-money laundering laws, financial services laws, corporation laws, privacy laws and tax laws). There are also various supervisory authorities whose laws and regulations we are subject to (e.g. the FSC). Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.

These obligations apply at various times, including client on boarding/acceptance,

payments and systemic checks for risk management.

For the purposes of safeguarding legitimate interests

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. Despite that, it must not unfairly go against what is right and best for you. Examples of such processing activities include the following:

1. initiating legal claims and preparing our defence in litigation procedures;
2. means and processes we undertake to provide for the Company's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures;
3. setting up CCTV systems (e.g., at our premises for security reasons);
4. measures to manage business and for further developing products and services;
5. sharing your personal data with third party service providers for the purpose of updating/verifying your personal data in accordance with the relevant anti-money laundering compliance framework;
6. risk management.

You have provided your consent

Our storage and use of your personal data is based on your consent (other than for the reasons described or implied in this policy when your consent is not required).

You may revoke consent at any time; however, any processing of personal data prior to the receipt of your revocation will not be affected. To assess the appropriateness of our services/products for the Clients

To provide you with products and services, or information about our products and services, and to review your ongoing needs

Once you successfully open a trading account with us, or subscribe to an update or webinar, we will need to use your personal information to perform our services and comply with our obligations to you. It is also in our legitimate interests to ensure that we are providing the best products and services so we may periodically review your needs to ensure that you are getting the benefit of the best possible products and services from us.

To help us improve our products and services, including customer services, and develop and market new products and services

We may from time to time use personal information provided by you through your use of the services and/or through client surveys to help us improve our products and services. It is in our legitimate interests to use your personal information in this way to ensure the highest standards when providing you with our products and

services and to continue to be a market leader in the financial services industry.

To form a profile about you

We may, from time to time, use personal information provided by you through your use of the services and/or through client surveys to help us improve our products and services. It is in our legitimate interests to use your personal information in this way to try to ensure the highest standards when providing you with our products and services and to continue to be a market leader in the financial services industry.

To investigate or settle enquiries or disputes

We may need to use personal information collected from you to investigate issues and/or settle disputes with you as it is in our legitimate interests to ensure that issues and/or disputes get investigated and resolved in a timely and efficient manner.

To comply with applicable laws, court orders, other judicial process, or the requirements of any applicable regulatory authorities

We may need to use your personal information to comply with any applicable laws and regulations, court orders or other judicial process, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

To send you surveys

From time to time, we may send you surveys as part of our customer feedback process. It is in our legitimate interest to ask for such feedback to try to ensure that we provide our services and products at the highest standards. However, we may, from time to time, also ask you to participate in other surveys and if you agree to participate in other surveys we rely on your consent to use the personal information we collect as part of such survey. All responses to any survey we send out whether for customer feedback or otherwise will be aggregated and depersonalised before survey results are shared with any third parties.

Data analysis

Our website pages and e-mails may contain web beacons or pixel tags or any other similar type of data analysis tools that allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence. We may aggregate your personal information (such as trading history) with the personal information of our other clients on an anonymous basis (that is, with your personal identifiers removed) so that more rigorous statistical analysis of general patterns may lead to us providing better products and services.

If your personal information is completely anonymised, we do not require a legal basis as the information will no longer constitute personal information. If your personal information is not in an anonymised form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market.

Marketing purposes

ACLIVE WEALTH ADVISORY (PTY) LTD owns and operates the brand CIFMarkets. ACLIVE WEALTH ADVISORY (PTY) LTD is registered in South Africa with registration number 2022/427817/07, and is licensed and regulated by the FSCA (Financial Sector Conduct Authority) with an FSP license number 54857. The Company's registered office is situated at 1 Hood Avenue, Rosebank, Johannesburg, Gauteng, 2196.

We may process your personal information to send you marketing communications by email or phone or other agreed forms (including social media campaigns) to ensure that you are always kept up to date with our latest products and services. If we send you marketing communications, we will either do so based on your consent or if it is in our legitimate interest. We will not disclose your information to any outside parties for the purpose of allowing them to directly market to you.

Internal business purposes and record keeping

We may need to process your personal information for internal business and research purposes as well as for record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services and products we provide to you and our relationship with you. We will also keep records to ensure that you comply with your contractual obligations pursuant to the agreement governing our relationship with you.

Legal notifications

Often the law requires us to advise you of certain changes to products or services or laws. We may need to inform you of changes to the terms or the features of our products or services. We need to process your personal information to send you these legal notifications. You will continue to receive this information from us even if you choose not to receive direct marketing information from us.

Corporate restructuring

If we undergo a corporate re-structuring or part, or if all of our business is acquired by a third party, we may need to use your personal information in association with that re-structuring or acquisition. Such use may involve sharing your information as part of a due diligence enquiries or disclosures pursuant to legal agreements. It is our legitimate interest to use your information in this way, provided we comply with any legal/regulatory obligation we have towards you.

Physical security

If you enter any of our premises we may record your image on our CCTV for security reasons. We may also take your details to keep a record of who has entered our premises on any given day. It is in our legitimate interest to do this to maintain a safe and secure working environment.

PERSONAL DATA DISCLOSURE

The Company shall not disclose any of its clients' confidential information to a third party, except: (a) to the extent that it is required to do so pursuant to any applicable laws, rules and/or regulations; (b) if there is a duty to the public to disclose; (c) if our legitimate business interests require disclosure; or (d) at your request or with your consent or to Persons described in this policy. The Company will endeavor to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under

such circumstances, the Company will notify the third party regarding the confidential nature of any such information.

As part of using your personal data for the purposes set out above, the Company may disclose your personal information to the following:

- our Associates, for business purposes, including certain third parties such as service providers and specialist advisers who have been contracted to provide us with administrative, financial, legal, insurance, research or other services;
- business introducers with whom we have a mutual business relationship;
- business parties, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law;
- payment service providers (PSPs) and/or banking institutions in relation to issues raised regarding deposits/withdrawals to/from trading account(s) held with the Company and/or for the purpose of commencing an investigation regarding such matters (e.g., third party deposits);
- anyone authorised by you.

If the Company discloses your personal information to business parties, such as card processing companies or banks, in order to perform the services requested by clients, such third parties may store your information in order to comply with their legal and other obligations.

Generally, we require that organisations outside the Company who handle or obtain personal information to acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the all relevant data protection laws and this Privacy Policy. Third party service providers such as credit referencing agencies (if and when applicable) may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches. Please note that the use of your personal information by external third parties who act as data controllers of your personal information is not covered by this Privacy Policy and is not subject to our privacy standards and procedures.

Clients accept and consent that the Company may, from time to time, analyse the data collected while visiting our website(s) or by other means, such as questionnaires, for statistical purposes in order to improve the Company's business activities.

TRANSFER OF PERSONAL DATA

We may transfer your personal information outside the European Economic Area to service providers (i.e. processors) who are engaged on our behalf. To the extent we transfer your information outside the EEA, we will ensure that the transfer is lawful and that processors in third countries are obligated to comply with the European data protection laws or other countries' laws which are comparable and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR

Article 46.

In view of the above, your personal information may be processed by the staff of our service providers operating outside the EEA, who work for us. Such staff may be, among others, engaged in the fulfilment of your requests, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing and processing. The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

COOKIES

Internet cookies are small pieces of data sent from our website(s) to your browser and stored on your computer's hard drive when using our website(s), and they may include a unique identification number. The purpose of collecting this information is to provide you with a more relevant and effective experience on our website(s), including the presentation of our web pages according to your needs or preferences.

Cookies are frequently used on many websites on the internet, and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our website(s) if you choose to disable the cookie acceptance in your browser, particularly in the Company's Members Area and other secure parts of our website(s). We therefore recommend you to enable cookie acceptance in order to benefit from all our online services.

Furthermore, we use cookies for re-marketing features in order to allow us to reach out to users who have previously visited our website(s) and have shown an interest in our products and services. Periodically, we may use third party vendors, such as Google to display our ads over the internet to you, based on your previous use of our website(s).

The Company uses session ID cookies and persistent cookies. A session ID cookie expires after a set amount of time or when the browser window is closed. A persistent cookie remains on your hard drive for an extended time period. You can remove persistent cookies by following directions provided in your web browser's 'Help' file.

CONSENT

Where our use of your personal information requires your consent, such consent will be provided in accordance with the express written terms which govern our business relationship (which are available on our website(s) as amended from time to time), or any other contract we may have entered into with you or as set out in our communication with you from time to time.

If we rely on your consent as our legal basis for holding and processing your personal information, you have the right to withdraw that consent at any time by contacting us

using the contact details set out in this Privacy Policy.

STORAGE

Safeguarding the privacy of your information is of utmost importance to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We will hold personal information, for as long as we have a business relationship with you, in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

When we consider that personal information is no longer necessary for the purpose for which it was collected, 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. For example, we are subject to certain anti-money laundering laws which require us to retain the following, for a period of five to seven years after our business relationship with you has ended:

- a copy of the documents we used in order to comply with our customer due diligence

obligations;

- supporting evidence and records of transactions with you and your relationship with us.
- Also, the personal information we hold in the form of a recorded communication, by telephone, electronically, in person or otherwise, will be held in line with local regulatory requirements (i.e., 5 years after our business relationship with you has ended). 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.

We may keep your data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons.

RIGHTS

The rights that might be available to you in relation to the personal information we hold about you are set out below.

Information and Access

If you ask us, we will confirm whether we are processing your personal information and, if so, what information we process and, if requested, provide you with a copy of that personal information (along with certain other details) within thirty (30) days from the

date of your request. If you require additional copies, we may need to charge a reasonable administration fee.

Rectification

It is important to us that your personal information is up to date. We will take all reasonable steps to make sure that your personal information remains accurate, complete and up-to-date. If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have disclosed your personal information to others, we will let them know about the rectification where possible. If you ask us, if possible and lawful to do so, we will also inform you who we have shared your personal information with so that you can contact them directly.

You may inform us at any time that your personal details have changed by sending us an e-mail at support@cifmarkets.com. The Company will change your personal information in accordance with your instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof, i.e., personal information that we are required to keep for regulatory or legal purposes.

Erasure

You can ask us to delete or remove your personal information in certain circumstances such as if we no longer need it or you withdraw your consent (if applicable) provided

that we have no legal obligation to retain that data. Such request will be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations and subject to section 'Storage of Your Personal Information and Retention Period'. If we have disclosed your personal information to others, we will let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we will also inform you who we have shared your personal information with so that you can contact them directly.

Processing restrictions

You can ask us to 'block' or suppress the processing of your personal data in certain circumstances such as if you contest the accuracy of that personal information or object to us processing it. It will not stop us from storing your personal information. We will inform you before we decide not to agree with any requested restriction. If we have disclosed your personal information to others, we will inform about the restriction if possible. If you ask us, if possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

Data Portability

Under the General Data Protection Regulation (679/2016), you have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine-readable format) and to re-use it elsewhere or ask us to transfer this to a third party of your choice.

Objection

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;
- processing your personal information for direct marketing; or
- processing your personal information for research unless we reasonably believe such processing is necessary or prudent for the performance of a task carried out in the public interest (such as by a regulatory or enforcement agency).

Automated decision-making and profiling

If we have made a decision about you based solely on an automated process (e.g. through automatic profiling) that affects your ability to use the services or has another significant effect on you, you can request not to be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us. Even where a decision is necessary for entering into or performing a contract, you may contest the decision and require human intervention. We may not be able to offer our services or products with you, if we agree to such request (i.e., end our relationship with you).

OPT-OUT

Should you not want us to use your personal information, you must inform the Company by sending an email to support@cifmarkets.com. If you decide to do so, we may not be able to continue to provide information, services and/or products requested by you, and we will have no liability to you in this respect.

LEGAL DISCLAIMER

The Company may disclose your personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect our rights and/or to comply with any proceedings, court order, legal process served or pursuant to governmental, intergovernmental or other regulatory bodies. The Company shall not be liable for misuse or loss of personal information or otherwise on the Company's website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise by you or due to your acts or omissions or a person authorized by you (whether that authorization is permitted by the terms of our legal relationship with you or not).

REVIEW OF THE POLICY

If you have a concern about any aspect of our privacy practices, you can submit a complaint. This will be acted upon promptly. To make a complaint, please contact us via email at support@cifmarkets.com.