



FSP License no. 23497

Regulated by the Financial Sector Conduct Authority

PRIVACY POLICY

Version 3.0

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Introduction

Rynat Capital (Pty) Limited is a South African investment company incorporated and registered under the legislations of the South Africa, with registration number 2004/005384/07. The Company is authorized and regulated by the Financial Sector Conduct Authority (“FSCA”) with Licence number 2349 to provide the reception and transmission of orders in relation to one or more financial instrument and execution of orders on behalf of clients. Any reference to ‘us’, ‘our’, ‘we’ or ‘Company’ in this privacy policy is a reference to each group company within the Rynat Capital as the context requires unless otherwise stated. Similarly, any reference to ‘you’, ‘your’, ‘yours’ or ‘yourself’ in this privacy notice is a reference to any of our customers and potential customers as the context requires unless otherwise stated.

Scope of the Privacy Policy

This privacy policy tells you how we use personal information collected at this site in accordance with the Protection of Private Information Act. Please read this privacy policy before using the site or submitting any personal information. By using the site, you are accepting the practices described in this privacy policy. These practices may be changed, but any changes will be posted and changes will only apply to activities and information on a going forward, not retroactive basis. You are encouraged to review the privacy policy whenever you visit the site to make sure that you understand how any personal information you provide will be used.

Note: the privacy practices set forth in this privacy policy are for this web site only. If you link to other web sites, please review the privacy policies posted in those sites.

Our commitment to you

As part of our day-to-day business, we need to collect personal information from our customers and potential customers to ensure that we can meet their need for a range of financial services and provide them with information about our services. Your privacy is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. This policy outlines how we manage your personal information supplied to us by you or a third party in connection with our provision of services to you or which we collect from your use of our services and/or our app(s) or website(s). It also details your rights in respect of our processing of your personal information.

Our privacy policy will be reviewed from time to time to take account of new obligations and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any personal information we hold will be governed by our most current privacy policy.

Data Protection Officer contact information

Should you have any questions about this privacy policy, including any requests to exercise your legal rights, please send us an email at: dpo@rynatcapital.com

Your Consent to collect and use of personal information

We collect personal, identifiable information such as names (proof of identity), postal addresses (proof of residence, email addresses, proof of payment etc. when you complete our Appropriateness test, Client Agreement or when you register as a site user for verification purposes and as required by the Financial Intelligence Centre Act 38 of 2001 (FICA). The information you provide is used to fulfil your specific request. Please note that when you access our website, we collect non-identifiable information in the following ways:

- Contact Data – we collect, which may include, but are not limited to, your first name, last name, nationality, date of birth, telephone number (landline and mobile), fax number, email address and postal address
- Personal and Professional Information - we collect, which may include, but are not limited to, your marital status, education, occupation, information regarding your financial situation such as source of wealth and gross annual income, tax identification number.
- Cookies (including third party Cookies) – Please refer to section 11 “Cookies”
- Financial data – to use the Company’s services, we may require to collect certain information, such as bank details, trading activity, transaction history, account balance information.

The Company has the right to request additional documents and information to carry out its due diligence where it deems fit. We only collect personal data that is adequate and relevant for the purposes of our

business and for a reasonable period of time as required by law. We never ask for more information that is required by law.

If you have given us your specific consent for processing (other than for the reasons set out above) then the lawfulness of such processing is based on that consent. You also consent when the Company is transferring your personal information outside the European Economic Area (“EEA”) where this is necessary for the Company to fulfil its contractual obligations to you (see section 10 below). You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

Types of Images & Reasons for Upload:

The images that we will collect from you will be the Proof of Identity, Proof of Address and Proof of Income in image format or in pdf format. Client will upload these images. These images will be collected for the purposes of identifying the client according the FIC Act. They will be used to verify your identify and residency including your source of income. The images collected will not be shared by any third party without the consent of the client. Some images or videos will be uploaded online as competition campaigns showing winners. This will be done with full consent provided by the client. All images and information collected will be stored for more than 5 years according to the FIC Act. The client’s rights regarding the use of the images and the information is found in the POPI Manual that can be found on our website. No images or any client information will be shared by any third party.

Disclosure of your personal data.

We may share information with governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when:

1. Permitted or required by legislation; or,
2. Within the Company – such as various departments within the Company, where all employees and contractors are required to follow our data privacy and security policies when handling personal data.
3. Trying to protect against or prevent actual or potential fraud or unauthorized transactions;
4. Investigating fraud which has already taken place.

Safeguard Measures

The Company takes reasonable precautions to protect Personal Information from loss, theft, misuse, unauthorized access or disclosure, alteration, or destruction. We employ physical, electronic, and procedural safeguards to protect Personal Information and it does not store Personal Information for longer than necessary to provide the Service or as permitted by legislation.

In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit. We do not store or collect any Credit Card data. All credit card information is stored on the payment provider side. All payments made between us and you, and vis a vis, via the company's merchant accounts and/or third-party payment processing service providers, the Client will receive unique billing descriptor on their card statement from the bank, confirming the payment and which may include, but not limited to, the description "Rynat Capital (Pty) Ltd, branded website and customer support service telephone number.

The Company's datacenter(s) contain both internal and external servers. Access to the Company's internal server is restricted to pre-approved persons, servers and locations; our external servers can be accessed via the Internet. Your Information is stored and encrypted on secure servers and our servers can only ever be accessed by authorized personnel. While we will use all reasonable efforts to safeguard Your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

Duration of keeping Your Information

You may request from us to erase/delete your personal data in cases where there is no rationale as to the need for us to continue to process it. However, we may not be able to comply with your request due to regulatory requirements by which you will be notified accordingly.

We will not keep Your Information for any longer than is required for legal and/or business purposes. In many cases, information must be kept for considerable periods of time, subject to a maximum of **five (5) years**. Retention periods will be determined considering the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

Cookies

A cookie is a small piece of text stored on your computer or device when you visit a website or an app. We use cookies on our websites or our apps to provide you with a more relevant and effective experience, including presenting web pages according to your needs or preferences. For further information about cookies and how we use cookies, please refer to our website.

Geographical processing of Personal data

In order to provide services to you, you acknowledge that it may be necessary for your information to be transferred to someone who provides a service to us in other countries, including some outside of the European Economic Area ("EEA"), and you consent to such transfer.

To the extent we transfer your information outside the EEA, we will ensure that the transfer is lawful and that the Processors in third countries are obligated to comply with the European data protection standards and to provide appropriate safeguards in relation to the transfer of your data in accordance with GDPR Article 46 and Protection of Information Act, 2013.

Update of this Policy

This Policy is subject to change without notice. For this reason, you are advised to look for updates from time to time.