

NEEX (PTY) LTD

PRIVACY & SECURITY POLICY

Prior to offering our services to you, we require you to read this Privacy & Security Policy.

Privacy and Security Policy

1. NEEEX (PTY) LTD

- 1.1. NEEEX (PTY) LTD, a private company incorporated under laws of South Africa (Registration No. 2017/388557/07). Neex (Pty) Ltd is authorised by the Financial Sector Conduct Authority ("FSCA") as a Financial Services Provider ("FSP") with Licence No. 49937, in terms of the Financial Advisory and Intermediary Services Act 37 of 2002 ("the FAIS Act"). Our registered address is No 5 Murano, Cnr Bellairs Comaro Drive, Glenvista, Gauteng, P.O. Box 2058, South Africa. Our contact email is info@neexecn.com.
- 1.2. We specialize in assisting traders and Introducing Brokers (IBs) in achieving their business objectives and personal aspirations by offering an extensive portfolio of services. Our business is founded on principles of integrity and trust, providing a leading combination of dynamic products, competitive trading parameters, and premium one-on-one service. NEEEX (PTY) LTD is dedicated to empowering the ambitions of FOREX traders and IBs by coupling dynamic products with competitive trading parameters and exceptional customer experiences.
- 1.3. For inquiries regarding this policy or the collection and usage of personal information, please reach out to us using the contact details provided below. Additionally, we have a designated Data Compliance Officer responsible for addressing data compliance matters.

Postal Address: No 5 Murano Cnr Bellairs Comaro Drive, Glenvista, Gauteng, PO Box 2058, South Africa.

Email: info@neexecn.com

2. NEEEX'S COMMITMENT

- 2.1. NEEEX (PTY) LTD, hereafter referred to as "NEEX", is committed to safeguarding the privacy of your personal and financial information, obtained to facilitate secure transactions on our website. This policy outlines how NEEEX manages the information provided by you or a third party in connection with our services, as well as information collected during your use of our website(s) and app(s). NEEEX will handle your personal information in accordance with this Privacy and Security Policy and in compliance with the laws of South Africa and the United Kingdom Data Protection legislation(s).
- 2.2. Data protection regulations mandate that the personal information we possess about you must:
 - Be used lawfully, fairly, and transparently.
 - Be collected only for valid purposes, clearly communicated to you, and not utilized in any manner inconsistent with those purposes.
 - Be relevant to the disclosed purposes and limited only to those purposes.

3. REASONS FOR COLLECTING PERSONAL INFORMATION

- 3.1. NEEEX collects specific personal information to fulfill the needs of its customers. By gathering this information, NEEEX can monitor and enhance the services offered to both current and potential customers.
- 3.2. NEEEX will utilize this information for the following purposes:
 - Verifying your identity.
 - Assessing the suitability of the products and services we offer.
 - Establishing and maintaining your account.
 - Providing our services to you.
 - Improving our services.
 - Fulfilling regulatory requirements.
 - Conducting marketing activities.

4. PERSONAL INFORMATION COLLECTED FROM YOU

- 4.1. NEEEX will gather and retain information about you when you complete an online application or any other form, or when you access and trade on your account through our website or another service provided by us. The personal information you provide may include (but is not limited to) your name, address, date of birth, passport number, tax identification number, email address, telephone number, employment and income details, credit/debit card information, transaction history, and financial statements.
- 4.2. NEEEX may extract information from your usage of our website or other services and may store this information alongside your personal profile. This data may encompass visited site areas, viewed pages, visit frequency and duration, transaction types, downloaded documents, and other websites that may have referred you or to which you link.
- 4.3. By opening an account with NEEEX and engaging in transactions, you acknowledge that you will be providing personal information, including potentially sensitive data as defined by Data Protection regulations, the United Kingdom Data Protection Act 1998, or the General Data Protection Regulation (GDPR), any other applicable laws and regulations to us, and you consent to the processing of that information by NEEEX for the purposes of performing its obligations under this Agreement and administering the relationship between you and NEEEX, including the disclosure of the information to Affiliates both within and outside of South Africa.
- 4.4. NEEEX requires specific information to execute an agreement with you, and you must provide this information to enter into an agreement with NEEEX for the provision of products and services. Failure to do so may result in our inability to offer you any products or services. Mandatory information fields are typically outlined in the application.
- 4.5. Other forms of correspondence or interaction (such as email, telephone, post, SMS, or via our website) between you and NEEEX will contain personal information (such as names and contact details). This may include inquiries, reviews, follow-up comments, complaints lodged by or against you, and disputes involving you or your organization.
- 4.6. NEEEX may also collect details of phone numbers used to contact our company, along with the date, time, and duration of any calls. Please note that if we record your calls to or from NEEEX, we will notify you accordingly.

5. USE OF PERSONAL INFORMATION

- 5.1. NEEEX may retain and utilize such information to fulfil legal requirements or if it is necessary for our legitimate interests or for any of the following purposes:
 - Providing the services you have requested, including processing transactions.
 - Confirming your identity.
 - Maintaining your personal profile.
 - Managing your account.
 - Contacting you when necessary or appropriate regarding the services provided.
 - Keeping you updated on matters such as traded contracts and NEEEX activities while you are a customer.
 - Managing and administering the products and services provided.
 - Providing information about the products and services offered by NEEEX.
 - Understanding the products and services you may be interested in.
 - Offering information or opportunities relevant to you.
 - Tailoring our website or services to your needs and interests.
 - Creating anonymized statistical data.

- 5.2 By using NEEX's services, you consent to the use of your personal information for the purposes stated above.
- 5.3 If we use your personal information for marketing purposes to inform you about NEEX's products and services, you have the right to opt out of receiving such communications.
- 5.4 You can exercise this right at any time by contacting us using the details provided. If you opt out of marketing emails, we will add you to our suppression list to prevent further marketing emails.
- 5.5 Existing customers or those acting as businesses may be contacted for marketing purposes as necessary for our legitimate interests.
- 5.6 If you are not an existing customer and are not acting as a business, we will only contact you for marketing purposes with your consent.
- 5.7 NEEX will only use your personal information for the purposes for which it was collected unless we reasonably consider a need to use it for another compatible purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis for doing so.

6. DISCLOSURE AND SHARING OF PERSONAL INFORMATION

- 6.1. NEEX does not sell, license, or otherwise disclose your personal information to third parties for marketing purposes. We may use third-party service providers for marketing purposes, but we ensure that they only use the information as instructed, treating it confidentially and keeping it secure. NEEX may be required to provide your personal information to the FSCA and other regulatory and government bodies from time to time in South Africa, the United Kingdom, and other countries. NEEX may also disclose your personal information to:
 - a) Financial institutions and other similar organizations that it deals with in the course of its corporate activities, or those that are nominated by you.
 - b) External service providers and professional advisers (which may be located overseas) that provide services to NEEX.
 - c) Any organization at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor, or accountant.
 - d) Any third parties where this is necessary to process a transaction or provide services which you have requested; or any authority to whom NEEX is required to disclose such information by law.
- 6.2 In the event that NEEX becomes subject to negotiations for the sale of its business (either wholly or partially), or is sold to a third party, or undergoes reorganization, you consent to the disclosure of any personal information we hold about you to such party or its advisors. This disclosure may occur as part of any due diligence process aimed at analysing any proposed sale or reorganization. Furthermore, your personal information may be transferred to the reorganized entity or third party and utilized for the same purposes as agreed to under this Agreement.

7. YOUR RIGHTS

- 7.1. You are not obligated to provide any personal information requested by NEEX. However, without such information, NEEX may be unable to open an account for you or provide you with any other services, information, or assistance you have requested.
- 7.2. Data protection law affords you several rights concerning the personal information we hold about you. The key rights are outlined below. Further information about your rights can be obtained from the FSCA. Under certain circumstances, you have the right to:
 - a) Be informed in a clear, transparent, and easily understandable manner about how we use your personal information and about your rights.

- b) Request access to your personal information (commonly known as a “data subject access request”).
- c) Request correction of the personal information NEEEX holds about you.
- d) Request erasure of your personal information.
- e) Object to processing of your personal information.
- f) Request restriction of processing of your personal information.
- g) Request transfer of your personal information to another party.
- h) Withdraw your consent.
- i) Lodge a complaint.

8. UPDATING YOUR INFORMATION

- 8.1. You may inform NEEEX at any time if your personal details have changed or if you wish NEEEX to review, verify, correct, or erase your personal information, withdraw your consent to processing, or request transfer of your personal information to another party. Please contact us via email at info@neexecn.com
- 8.2. NEEEX will amend or delete your personal information as per your instructions, except where required to hold your personal information for regulatory or legal purposes, to provide you with requested services, or to maintain adequate business records.

9. ACCESSING YOUR INFORMATION

- 9.1. Under relevant data protection legislation, subject to certain exceptions, you have the right to obtain copies of any personal information NEEEX holds about you.
- 9.2. If you wish to access or correct any personal information held by NEEEX, please notify us in writing using the address provided at the beginning of this policy.
- 9.3. NEEEX may need to request specific information from you to confirm your identity and ensure your right to access the information.
- 9.4. Please consider your request responsibly before submitting it. NEEEX will respond as soon as possible, generally within one month.
- 9.5. If you make a written request, we will also correct, delete, and/or block personal information as necessary information from further processing if that information proves to be inaccurate.
- 9.6. Please be aware that certain information may be exempt from disclosure under Data Protection Regulations, or NEEEX may be unable to disclose information upon request.

10. COOKIES AND WEBSITE INFORMATION

- 10.1. NEEEX utilizes cookies and other tools, such as web page counters or analytics tools, to gather information about your access to our website and other services provided to you. Cookies are small pieces of information stored on your device, which are necessary for our legitimate interests in administering our website effectively and securely.
- 10.2. We or third-party advertisers may also use this information to serve targeted advertisements. However, these advertisements will not include personal information such as your name or contact details. This use of your information is necessary for our legitimate interests in marketing to you.
- 10.3. Information gathered about your website activity will be retained until the relevant cookie expires or is removed by you.
- 10.4. Cookies collect statistical and factual information about your usage of our services. Most internet browsers accept cookies by default, but you have the option to change your

browser settings to refuse cookies. However, this may affect the quality of the services provided to you.

- 10.5. Our website may contain links to third-party websites, plug-ins, and applications. Clicking on these links may allow third parties to collect or share data about you. We are not responsible for the privacy practices of these third-party websites, so we encourage you to read their privacy policies when leaving our website.

11. CONTENT INFORMATION

- 11.1. This refers to information you provide when posting content on NEEX's website or social media platforms, including reviews, photographs, videos, and other content.
- 11.2. We may display and publish this information on our platforms as part of our contract with you or for our legitimate interests in providing content to our users.
- 11.3. Your content information will be retained for as long as you have an account with us and may be kept indefinitely after you close your account.

12. INFORMATION COLLECTED AT OUR PREMISES

- 12.1. VISITOR INFORMATION. NEEX collects information about visitors to our premises, including the date and time of visit, purpose of visit, visitor's name, employer, contact details, and vehicle registration number.
- 12.2. CCTV. NEEX may operate CCTV at our premises, recording activities for security purposes. Footage is only released as necessary for law enforcement or dispute resolution.
- 12.3. This information is used for visitor administration, site security, and visitor safety, as well as parking administration.

13. STORAGE OF INFORMATION

- 13.1. By accessing our services, you acknowledge and agree that your personal information may be transferred within or outside South Africa. We may disclose relevant information about you or your Trading Account(s) to parties seeking references or credit references in good faith, which could impact your ability to obtain credit. NEEX only transfers personal information to organizations outside South Africa if we have assessed their controls and safeguards as appropriate.
- 13.2. Some countries or organizations outside of South Africa may have an "adequacy decision" in place, indicating a sufficient data protection regime. Data may be transferred, stored, and processed in countries without "adequate protection" for purposes related to your Account's operation. By using our services, you consent to NEEX processing and disclosing your information according to our Privacy and Security Policy.
- 13.3. If we transfer data to countries or organizations lacking an adequate data protection regime, we will implement appropriate safeguards, such as South Africa, UK and EU-approved model clauses or oversight by a data protection authority.

14. DATA SECURITY

- 14.1. NEEEX prioritizes security and adheres to industry best practices to protect your personal information. Measures include encrypting data during transmission, implementing strong authentication mechanisms, and securing access to machines and data.
- 14.2. We have established internal security measures to prevent unauthorized access, use, or alteration of your personal information. Access to your data is limited to authorized personnel who require it for business purposes, and they are bound by confidentiality obligations.
- 14.3. NEEEX has procedures in place to address suspected data security breaches and will notify you and relevant regulators if such breaches occur.

15. RETENTION OF INFORMATION

General retention policy

- 15.1. Our retention period for personal information is determined by factors including the nature and sensitivity of the data, potential risks, processing purposes, legal requirements, and alternative means of achieving those purposes.
- 15.2. Generally, NEEEX retains information for five (5) years, but we may need to keep it longer to fulfill legal, accounting, or reporting obligations.

16. LEGAL CLAIMS

- 16.1. We may retain your personal information as necessary to defend or bring legal claims. The duration of retention depends on the nature of the claim and associated risks.
- 16.2. In certain circumstances, we may anonymize your personal information for use without further notice.

17. YOUR CONSENT

- 17.1. Kindly review the following to comprehend our principles and procedures concerning your personal data and its treatment. By utilizing this website or any other service provided by NEEEX, you agree to the collection, maintenance, utilization, and disclosure of personal information about you, whether provided by yourself or another party as outlined above.

18. AMENDMENTS TO POLICY

- 18.1. NEEEX reserves the right to amend this Privacy and Security Policy periodically for any reason. We will inform you of such changes by updating the policy on this website or, when appropriate, via email.
- 18.2. It is your responsibility to regularly review this Privacy and Security Policy. Continued use of our website or services after any revisions are published constitutes your acceptance of those changes.