

Privacy Policy

1. Introduction

This Privacy Policy applies to IFC Markets SA (Pty) Ltd ("we," "us," or "our"), a private company registered under the laws of the Republic of South Africa with registration number 2021/682339/07. We are authorised and regulated by the Financial Sector Conduct Authority (FSCA) under FSP number 51818 to act as a Financial Services Provider in accordance with the Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS Act).

We are committed to safeguarding the personal information of our clients, employees, and other stakeholders in compliance with the Protection of Personal Information Act No. 4 of 2013 (POPIA), Promotion of Access to Information Act No. 2 of 2000 (PAIA), and other applicable South African data protection laws.

2. Definitions

- **Personal Information:** Any information that identifies or relates to an identifiable, living natural person or juristic entity, as defined in Section 1 of POPIA.
- **Data Subject:** The individual or entity to whom personal information pertains.
- **Processing:** Any operation concerning personal information, including collection, storage, modification, distribution, or destruction.
- **Responsible Party:** IFC Markets SA, which determines the purpose of and means for processing personal information.
- **Information Regulator:** The regulatory authority established under POPIA and PAIA to oversee data protection compliance.

3. Scope of the Policy

This policy applies to all personal information collected and processed by IFC Markets SA, including but not limited to:

- Clients and prospective clients.
- Employees and contractors.
- Business partners and affiliates.
- Visitors to our website and mobile applications.

4. Legal Framework

We process personal information in accordance with:

- **POPIA:** Ensuring lawful, fair, and transparent processing of personal information.
- **PAIA:** Providing access to information in accordance with established rights and procedures.

- ECTA: Governing electronic communications and transactions, including data privacy and security.

5. Collection of Personal Information

We collect personal information in the following ways:

- Directly from you when you complete forms, contact us, or use our services.
- Automatically through cookies, IP addresses, and browsing behavior on our website.
- From third-party sources, including credit bureaus, financial institutions, and publicly available data.

Types of Information Collected:

1. Identification Information: Name, ID/passport number, date of birth.
2. Contact Information: Address, phone number, email address.
3. Financial Information: Banking details, transaction records.
4. Behavioural Data: Website usage patterns, preferences.
5. Employment Data (if applicable): Employment history, qualifications.

6. Purpose of Processing Personal Information

We process personal information for the following purposes:

1. To provide financial services and intermediary support in line with regulatory requirements.
2. To comply with legal obligations, including tax reporting and anti-money laundering regulations.
3. To improve our services through feedback, research, and analytics.
4. To manage and secure our IT systems.
5. For marketing, provided explicit consent has been obtained.

7. Sharing of Personal Information

We may share personal information with:

- Regulatory authorities, including the FSCA, and the Information Regulator.
- Service providers such as IT consultants, auditors, and legal advisors.
- Third-party affiliates involved in delivering our services.
- Law enforcement agencies where legally required.

We ensure that all third-party service providers adhere to strict confidentiality and data protection requirements.

8. Rights of Data Subjects

Under POPIA, data subjects have the following rights:

1. Access: Request access to your personal information.
2. Correction/Deletion: Request correction or deletion of inaccurate or outdated information.
3. Objection: Object to processing of personal information for direct marketing.
4. Data Portability: Receive your personal information in a structured, commonly used format.
5. Lodge Complaints: Submit complaints to the Information Regulator.

To exercise these rights, contact our Information Officer at info@ifcmarkets.co.za.

9. Retention of Personal Information

We retain personal information only for as long as it is necessary to fulfil the purposes outlined in this policy, comply with legal obligations, or protect our legitimate interests. Once no longer required, personal information will be securely destroyed or anonymised.

10. Security Measures

We implement appropriate technical and organisational measures to protect personal information against unauthorised access, loss, or misuse. These include:

- Encryption of data in transit and at rest.
- Role-based access controls.
- Regular security audits and penetration testing.
- Secure storage facilities for physical and electronic records.

11. Transborder Data Transfers

If personal information is transferred outside South Africa, we ensure that:

- The recipient country has similar data protection laws.
- There are binding agreements ensuring data security.
- Consent has been obtained where required.

12. Cookies and Tracking Technologies

Our website uses cookies and similar technologies to:

- Enhance user experience.
- Analyse website traffic.
- Provide personalised advertising, subject to consent.

You can manage your cookie preferences through your browser settings.

13. Information Officer

Our Information Officer is responsible for ensuring compliance with this policy and applicable legislation.

Contact Details:

- Name: Mr. Grigory Khanbekyan
- Email: info@ifcmarkets.co.za

14. Updates to this Policy

We may update this Privacy Policy periodically to reflect changes in legislation, technology, or our practices. Updated versions will be published on our website, and significant changes will be communicated directly where necessary.

15. Contact Information

If you have questions about this Privacy Policy or wish to exercise your rights, please contact:

- Email: info@ifcmarkets.co.za
- Postal Address: Norwich Place West 2nd floor, CNR 5th and Norwich, Sandown Sandton, Gauteng, 2031, Republic of South Africa

For more information about your rights or to lodge a complaint, contact the Information Regulator:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

Website: <https://www.justice.gov.za/inforeg/>

Email: enquiries@inforegulator.org.za

Telephone: 010 023 5200