

PRIVACY POLICY

Maono Global Markets (Pty) Ltd

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1. DEFINITIONS AND INTERPRETATION

1.1. Definitions

In this Privacy Policy (“Policy”), unless the context indicates otherwise, the following words and expressions shall have the meanings set out below, and cognate expressions shall bear corresponding meanings:

- 1.1.1. **“Act”** means, as the context requires, (a) the Protection of Personal Information Act, 4 of 2013 (“POPIA”); (b) the Financial Advisory and Intermediary Services Act, 37 of 2002 (“FAIS Act”); (c) the Financial Markets Act, 19 of 2012 (“FMA”); and any regulations, codes, directives or subordinate legislation issued in terms thereof, as amended or re-enacted from time to time.
- 1.1.2. **“Authorised Financial Services Provider” or “FSP”** means a person licensed as a financial services provider in terms of the FAIS Act and authorised by the FSCA to provide financial services in respect of specified financial products.
- 1.1.3. **“Business Day”** means any day other than a Saturday, Sunday, or official public holiday in the Republic of South Africa.
- 1.1.4. **“Client”, “customer”, “you” or “your”** means any natural person or juristic person whose Personal Data is collected, held, used, stored, disclosed or otherwise processed by Us, including any person who visits or uses the Website, applies to open or opens an account, or uses any of Our products or services.

- 1.1.5. **“Client Agreement”** means the written agreement (including any schedules, annexures, terms, policies and amendments) entered into between the Client and RocketX (Pty) Ltd governing, among other things, the opening and operation of a trading account and the use of related services.
- 1.1.6. **“Company”** means, as the context requires, Maono Global Markets (Pty) Ltd and/or RocketX (Pty) Ltd and/or Sithundhi Group (Pty) Ltd, or any of them individually, insofar as they collect, receive, hold or process Personal Data in terms of this Policy.
- 1.1.7. **“Cookie”** means a small text file that is stored on a user’s device (such as a computer, smartphone or tablet) when the user visits the Website, which enables the Website to recognise the user’s device, store preferences and enhance or customise the browsing experience.
- 1.1.8. **“Data Subject”** has the meaning ascribed to it in POPIA and, for purposes of this Policy, refers to any identified or identifiable natural person to whom Personal Data relates and whose Personal Data is processed by or on behalf of Us.
- 1.1.9. **“FSCA”** means the Financial Sector Conduct Authority, being the market conduct regulator for financial institutions in South Africa established in terms of the Financial Sector Regulation Act, 9 of 2017.
- 1.1.10. **“Group Company”** means any holding company, subsidiary, or other entity which directly or indirectly controls, is controlled by, or is under common control with Maono Global Markets (Pty) Ltd, RocketX (Pty) Ltd, or Sithundhi Group (Pty) Ltd.
- 1.1.11. **“Juristic Person”** means a body corporate, partnership, association or trust (irrespective of whether it has separate legal personality) and any similar entity which is recognised as a person in law.
- 1.1.12. **“Juristic Representative”** means a juristic person mandated and authorised in terms of section 13 of the FAIS Act to act as a representative of an Authorised Financial Services Provider and to render financial services on its behalf, subject to the conditions of such authorisation.
- 1.1.13. **“Maono Global Markets (Pty) Ltd” or “Maono”** means Maono Global Markets (Pty) Ltd, registration number 2023/599736/07, a company incorporated in accordance with the laws of the Republic of South Africa and authorised as a Juristic Representative of Sithundhi Group (Pty) Ltd with the FSCA.
- 1.1.14. **“Organisation”, “We”, “Us” or “Our”** means, as the context requires, Maono, RocketX (Pty) Ltd and/or Sithundhi Group (Pty) Ltd, either individually or collectively, in connection

with the collection and processing of Personal Data, the operation of the Website, and the provision of products and services.

- 1.1.15. **“Personal Data”** or **“personal information”** means any information relating to an identifiable, living natural person, and where applicable, an identifiable existing juristic person, as contemplated in POPIA, including but not limited to a Data Subject’s name, surname, identification or registration number, contact details, residential address, employment details, income information, account details, online identifiers and any other information described in clause 3.2 of this Policy.
- 1.1.16. **“Processing”** or **“process”** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Data, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, consultation, use, dissemination, distribution, making available, merging, linking, restriction, degradation, erasure or destruction of information, as contemplated in POPIA.
- 1.1.17. **“Regulator”** means any regulatory or supervisory authority having jurisdiction over Us, including, where applicable, the Information Regulator (South Africa), the FSCA, and any other competent authority responsible for supervising compliance with applicable privacy, financial sector or other laws.
- 1.1.18. **“RocketX (Pty) Ltd”** means RocketX (Pty) Ltd, registration number 2020/824856/07, a company incorporated in accordance with the laws of the Republic of South Africa, licensed and regulated as a Financial Services Provider and Over the Counter Derivatives Provider with FSP Number 52142, whose registered office is at Flexisuites, 141 Corobay Avenue, Menlyn, Gauteng, 0181.
- 1.1.19. **“Sithundhi Group (Pty) Ltd”** or **“Sithundhi”** means Sithundhi Group (Pty) Ltd, registration number 2021/817017/07, a company incorporated in accordance with the laws of the Republic of South Africa, authorised as a Financial Services Provider by the FSCA with FSP number 52030, and acting as principal FSP to Maono in its capacity as Juristic Representative.
- 1.1.20. **“Third Party”** means any person or entity other than the Data Subject and the Organisation, including any Group Company, business partner, facilitator, service provider, introducer, adviser, credit reference agency, fraud prevention agency, court, regulator, law enforcement agency or other counterparty to whom Personal Data may be disclosed in accordance with this Policy.
- 1.1.21. **“Website”** means any website, web portal, online platform or mobile application

products, services or client onboarding, and includes any successor sites as may be notified to customers from time to time.

- 1.1.22. **“Writing” or “written”** includes any communication sent by electronic mail or via an electronic communications platform, provided that such communication is capable of being stored and reproduced.

1.2. Interpretation

- 1.2.1. Headings and sub-headings are for convenience only and shall not affect the interpretation of this Policy.
- 1.2.2. Words importing:
- 1.2.3. the singular include the plural and vice versa;
- 1.2.4. any one gender include the other genders; and
- 1.2.5. natural persons include juristic persons and vice versa.
- 1.2.6. Any reference to a statute or statutory provision is a reference to that statute or statutory provision as amended, re-enacted or replaced from time to time and includes any regulations, codes or subordinate legislation issued thereunder.
- 1.2.7. If any provision in a definition is a substantive provision conferring rights or imposing obligations on any party, effect shall be given to it as if it were a substantive provision in the body of this Policy.
- 1.2.8. In the event of any conflict or inconsistency between this Policy and the Client Agreement, the Client Agreement shall prevail in respect of the contractual relationship between the Client and RocketX (Pty) Ltd, provided that nothing in the Client Agreement shall limit or exclude any rights of a Data Subject or obligations of the Organisation under POPIA or any other applicable data protection law.
- 1.2.9. References to “including” or “includes” shall be construed as being “without limitation”, and shall not limit the generality of any preceding words.

2. DISCLAIMER:

- 2.1. Maono Global Markets (Pty) Ltd with company registration number: 2023/599736/07 is an authorised Juristic Representative of Sithundhi Group (Pty) Ltd, South Africa, with company number: 2021/817017/07, an authorised financial services provider, licensed and regulated by the Financial Sector Conduct Authority (FSCA) of South Africa with FSP No. 52030.

- 2.2. Maono Global Markets (Pty) Ltd, an authorised Juristic Representative of Sithundhi Group (Pty) Ltd, is the platform that Clients use to trade derivatives that are issued by RocketX (Pty) Ltd, registration number 2020/824856/07, a company registered under the laws of South Africa. RocketX (Pty) Ltd a licensed and regulated Financial Services Provider (FSP) and Over the Counter Derivatives Provider (ODP) with FSP Number: 52142 whose registered office is at Flexisuites, 141 Corobay Avenue, Menlyn, Gauteng 0181 is the counterparty and principal to the contract for difference purchased by you (the Client).
- 2.3. By using our services, you agree to be bound by the Client Agreement, which is entered into and binding between you (the Client) and RocketX (Pty) Ltd

3. COLLECTION OF PERSONAL DATA

- 3.1. We collect personal data provided explicitly and knowingly by the customer.
- 3.2. To open an account with us, customers must provide the following Personal Data:
- 3.2.1. Full name.
 - 3.2.2. Residential address.
 - 3.2.3. Employment details.
 - 3.2.4. Average income.
 - 3.2.5. Other personal details (upon necessity and request).

4. USE OF DATA

- 4.1. We may process the customer's Personal Data for the following purposes:
- 4.1.1. To fulfil obligations arising from agreements between the customer and Us.
 - 4.1.2. To provide notifications about changes to products and/or services, as well as other important alterations affecting the performance of an agreement between the customer and us.
 - 4.1.3. To provide notifications about our products and/or services. Customers must give explicit consent to receive such information.
 - 4.1.4. If the customer is required to provide Personal Data to comply with legal requirements or to conclude an agreement with us, the purpose of collecting Personal Data will be made evident and communicated to the customer.

5. PROTECTION OF DATA

- 5.1. We retain customers' Personal Data for a period determined at Our discretion.

- 5.3. Customers have the right to request the termination of receiving such updates by informing Us of their intent.
- 5.4. We are committed to ensuring the security of personal data and confidential information received from our customers and adhere to internal rules governing the use of such information.
- 5.5. **We may share Personal Data with the following recipients:**
- 5.5.1. **Any Group Company, business partner, or facilitator:** Personal Data may be made available to members of our group, business partners, or facilitators to provide products, services, customer support, and technical support.
- 5.5.2. **Third-party service providers:** Personal Data may be shared with third-party service providers who support our products and services, such as system and platform maintenance, customer due diligence, credit checks, marketing, data analytics, and search engine services.
- 5.5.3. **Fraud prevention and credit reference agencies:** Personal Data may be shared with third-party service providers to conduct anti-money laundering, fraud prevention, credit risk, and customer due diligence checks.
- 5.5.4. **Introducers and advisers:** Personal Data may be disclosed to introducers who directed the customer to us.
- 5.5.5. **Courts, regulators, and law enforcement agencies:** Personal Data may be shared to comply with legal or regulatory obligations and respond to requests from government authorities, including law enforcement or financial regulators.
- 5.5.6. **Other third parties:** Personal Data may be shared in the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock.
- 5.6. **Storage and Destruction of Personal Data**
- 5.6.1. Personal Data is stored electronically on our servers. When Personal Data is no longer required to be kept, it will be destroyed using methods that prevent unauthorised access by third parties.

6. CUSTOMER CONSENT AND RIGHTS

- 6.1. By accessing our website, customers consent to the collection, use, maintenance, and disclosure of their personal data in accordance with this Privacy Policy.
- 6.2. Customers have the following rights:

6.2.1.

To request and obtain a copy of the Personal Data we hold about them

- 6.2.2. To request amendment and/or correction of any incorrect or incomplete data.
- 6.2.3. We will fulfil the request and notify relevant third parties to whom the data was transmitted.
- 6.2.4. To request that we stop processing their Personal Data, acknowledging that this may affect the provision of some services.
- 6.2.5. To request the erasure of Personal Data from our records, unless there is a lawful reason not to do so.
- 6.2.6. To complain to the supervisory authority, after first contacting us to attempt resolution.

7. COOKIES

- 7.1. We use Cookies on our website to provide users with a more customised web browsing experience. Cookies are small files stored on a user's computer that hold a modest amount of data specific to a particular client and website.

8. MAINTENANCE OF CONFIDENTIALITY

- 8.1. Customers are responsible for maintaining the confidentiality of their user ID and login information.

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