



## PRIVACY POLICY

RAZOR MARKETS (Pty) Ltd

Date: NOVEMBER 2024

Version: 1

### 1. Purpose



Registration number 2024/605719/07

*Razor Markets (Pty) Ltd (registration number 2024/605719/07) is a duly appointed Juristic Representative of Sithundhi Group (Pty) Ltd, a company duly incorporated under the laws of South Africa with registration number 2021/817017/07 and regulated by the Financial Sector Conduct Authority (FSCA) under FSP No. 52030. The trading platform provided by Razor Markets enables Clients to engage in derivative trading, offering products issued by RocketX (Pty) Ltd. RocketX (Pty) Ltd, a company duly incorporated under South African law with registration number 2020/824856/07, operates as a licensed Financial Services Provider (FSP) and authorized Over-the-Counter Derivatives Provider (ODP), holding FSCA license number 52142. RocketX (Pty) Ltd is headquartered at WeWork South Africa, 155 West Street, Sandown, Sandton, Gauteng, 2031. In all Contracts for Difference (CFDs) entered into by you (the Client) on the Razor Markets platform, RocketX (Pty) Ltd serves as the designated Counter Party and Principal, assuming full counterparty risk in accordance with regulatory obligations. By using Razor Markets' services, you acknowledge and agree to be bound by the Client Agreement, a legally binding contract between you (the Client) and RocketX (Pty) Ltd.*



This Privacy Policy outlines how RAZOR MARKETS (PTY) LTD collects, uses, discloses, and protects personal information obtained from clients, data subjects and visitors to our website.

We are committed to protecting the privacy of our users and complying with applicable Protection of Personal Information Act 4 of 2013 (POPIA) and other data protection laws.

#### Information We Collect

**Personal Information:** We may collect personal information, such as names, contact information (including email address and phone number), and identification details when users voluntarily provide it through our website forms or when contacting us.

**Usage Information:** We may collect non-personal information about users' interactions with our website, including IP addresses, browser types, referring pages, and pages visited. This data is used for statistical analysis and improving our website's functionality.

### 2. Disclosure of Information

We do not sell or rent personal information to third parties.

### 3. Data Security

We take reasonable steps to protect the security and confidentiality of personal information. However, no data transmission over the internet is completely secure, and we cannot guarantee the security of user data.

### 4. Cookies

Our website may use cookies to enhance the user experience. Users can control cookie preferences through their browser settings. Please refer to our Cookie Policy for more details.



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## 5. Links to Other Websites

Our website may contain links to third-party websites. We are not responsible for the privacy practices or content of these websites. Users should review the privacy policies of external sites they visit.

## 6. Principles of POPIA Compliance

### 6.1 Accountability

RAZOR MARKETS is committed to maintaining accountability for the processing of personal information and ensuring compliance with POPIA.

### 6.2 Processing Limitation

Personal information will only be processed for legitimate purposes, and we will ensure that the processing is lawful, adequate, and relevant.

### 6.3 Purpose Specification

RAZOR MARKETS will specify the purposes for which personal information is collected, and data subjects will be informed of these purposes.

### 6.4 Data Minimization

We will only collect and process personal information that is necessary for the intended purpose and will not retain it for longer than required.

### 6.5 Information Quality

We will take reasonable steps to ensure that personal information is accurate, complete, and up-to-date.

### 6.6 Openness and Transparency



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RAZOR MARKETS will be transparent about how personal information is processed, and data subjects have the right to access their personal information.

#### **6.7 Security Safeguards**

We will implement appropriate security measures to protect personal information against unauthorized access, disclosure, or loss.

#### **6.8 Data Subject Participation**

Data subjects have the right to access, correct, or request the deletion of their personal information, and RAZOR MARKETS will facilitate these rights.

### **7. Roles and Responsibilities**

#### **7.1 Data Protection Officer (DPO)**

RAZOR MARKETS has a designated Information Officer is responsible for overseeing POPIA compliance and acting as a point of contact for data subjects.

#### **7.2 Employees and Contractors**

All employees and contractors must adhere to this policy and report any potential breaches or concerns to the Information Officer.

### **8. Cross Border Transfer Practices**

Although we don't perform any cross-border transfers of information, In the event that we may need to conduct any cross-border transfers, we will take reasonable steps to implement appropriate safeguards to protect your personal information during cross-border transfers. These safeguards may include contractual agreements, data protection impact assessments, or other measures designed to ensure the security and confidentiality of your information.



We will adhere to applicable data protection laws and regulations if transferring personal information across borders. In cases where specific contractual or legal mechanisms are required for cross-border data transfers, we will take necessary steps to comply with such requirements. Prior to such any changes in our cross-border transfer practices, we may update this clause to reflect changes in our cross-border transfer practices. We will provide notice of any material changes and seek your consent if required by applicable laws.

## **9. Data Breach Response**

### **9.1 Reporting**

Any suspected or actual data breaches must be reported immediately to the DPO and, if necessary, to the relevant regulatory authorities.

### **9.2 Investigation and Notification**

RAZOR MARKETS will promptly investigate data breaches and, if required by law, notify affected data subjects and regulatory authorities.

## **10. Training and Awareness**

RAZOR MARKETS will provide training to employees and contractors on their responsibilities under POPIA and the importance of data protection and maintain ongoing awareness campaigns to educate employees about data protection best practices.

## **11. Updates to our Policy**

We may update this Privacy Policy to reflect changes in our data handling practices or legal requirements. The updated policy will be posted on our website with a revised "Last Updated" date.



## 12. Contact Us

If you have any questions or concerns regarding this Privacy Policy or your personal information, please contact us at [support@razormarkets.co.za](mailto:support@razormarkets.co.za).



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