

PRIVACY POLICY

Effective Date: 1 July 2025

INTRODUCTION

Armoury Broker (PTY) Ltd ("Armoury Broker", "we", "us", "our") takes the protection of personally identifiable information ("Personal Data") of the individuals and legal entities ("Data Subjects") who visit our Website and use our Services very seriously. Please read this Privacy Notice (the "Notice") to learn more about the way we collect, store, and use Personal Data. This Notice also provides you with more information on the privacy rights you may have under applicable privacy laws, including the Protection of Personal Information Act, 4 of 2013 (the "POPIA").

SCOPE OF THIS PRIVACY POLICY

This Privacy Policy applies to Personal Data we collect through:

- Our website at www.armourybroker.com
- Our online marketplace services
- Our social media channels
- Marketing and sales activities
- Customer communications and support

THIS POLICY DOES NOT COVER:

- Personal data of our employees, contractors, or officers
- Information that cannot identify you as an individual
- Third-party websites linked from our site

DATA CONTROLLER INFORMATION

Armoury Broker (Pty) Ltd acts as the data controller for your Personal Data under this Policy. We determine how and why your Personal Data is processed.

Important: Sellers and buyers using our marketplace are independent data controllers for any Personal Data they process during transactions, communications, or dispute resolution. We cannot control how these parties use your Personal Data - please check their individual privacy policies.

LEGAL BASIS FOR PROCESSING

We process your Personal Data based on:

Legal Basis	Examples
Consent	Marketing communications, optional features
Contract Performance	Account creation, order processing, payment
Legitimate Interests	Website analytics, fraud prevention, service improvement
Legal Compliance	Tax records, regulatory reporting

Your Rights: You can withdraw consent at any time, but this won't affect previous processing or our other legal grounds for processing.

HOW WE COLLECT YOUR INFORMATION

We collect your Personal Data when you:

- ✓ **Visit our website** - IP address, browser data, page interactions
- ✓ **Create an account** - Name, email, contact details
- ✓ **Make purchases** - Billing information, transaction history
- ✓ **Contact us** - Via phone, email, or contact forms
- ✓ **Engage with marketing** - Click ads, open emails, social media
- ✓ **From partners** - Affiliate companies within our group
- ✓ **Public sources** - Publicly available information

TYPES OF INFORMATION WE COLLECT

Personal Identifiers

- Full name and surname
- Email address and phone number
- Postal address

Account & Transaction Data

- Login credentials and account preferences

- Order history and purchase details
- Payment and billing information
- Customer service communications

Technical Information

- IP address and location data
- Device type, browser, and operating system
- Website usage patterns and interactions
- Cookies and tracking technologies

HOW WE USE YOUR INFORMATION

We use your Personal Data to:

Essential Services

- Provide access to our website and marketplace
- Process your orders and payments
- Manage your account and profile
- Respond to your inquiries and support requests

Business Operations

- Send relevant marketing communications (with your consent)
- Analyze and improve our services
- Prevent fraud and ensure security
- Comply with legal and regulatory requirements

Retention of personal data

We will aim to keep the Personal Data we collect as accurate, complete, and up-to-date as is necessary for the purposes in this Notice. We will only retain Personal Data for as long as it is necessary to fulfil the purpose for which it was collected and for as long as that purpose continues unless otherwise required by law.

INFORMATION SHARING

Service Providers

We share your data only with trusted service providers who help us operate our business:

- **Web hosting** - To keep our website running
- **Payment processing** - To handle transactions securely
- **Customer support** - To manage customer relationships
- **Analytics** - To understand website usage

All service providers are contractually bound to protect your data and use it only for specified purposes.

INTERNATIONAL TRANSFERS

Some service providers may be located outside South Africa. When we transfer data internationally, we ensure:

- The destination country has adequate data protection laws, OR
- We have agreements requiring equivalent protection standards

OTHER DISCLOSURES

We may disclose your information when:

- Required by law or legal proceedings
- Part of a business sale, merger, or restructuring
- Shared with group companies for business purposes

Note: We cannot guarantee privacy protection when disclosure is legally mandated.

DATA SECURITY & RETENTION

Security Measures

We protect your Personal Data through:

- Technical safeguards (encryption, secure servers)
- Administrative controls (access restrictions, staff training)
- Physical security (secure facilities, data centers)

Data Retention

We keep your Personal Data only as long as necessary for:

- The purposes outlined in this policy
- Legal and regulatory requirements

- Legitimate business needs

REPORTING SECURITY ISSUES

If you suspect a data breach or have security concerns, contact our Information Officer immediately at: **support@armourybroker.com**

COOKIES & TRACKING TECHNOLOGIES

What Are Cookies?

Cookies are small data files stored on your device that help us provide and improve our services.

Types of Cookies We Use

Cookie Type	Purpose	Duration
Essential	Website functionality, login sessions	Session/Temporary
Analytics	Usage statistics, performance monitoring	Persistent
Marketing	Personalized ads, campaign tracking	Persistent

THIRD-PARTY COOKIES

We use **Google Analytics** to understand website usage. Google may set its own cookies and collect data according to their privacy policy.

- [How Google uses your data](#)
- [Google Privacy Policy](#)

YOUR COOKIE CHOICES

- **Browser Settings:** You can block or delete cookies through your browser settings
- **Limitations:** Blocking cookies may limit website functionality
- **Do Not Track:** Our website doesn't respond to DNT signals

For more information about DNT: <https://allaboutdnt.com>

LINKS TO OTHER WEBSITES

This Website may include links to other affiliated and unaffiliated websites. Those websites will have their own privacy policies that you may wish to review. We have no responsibility for unaffiliated linked websites or any use of those sites and their privacy practices. This Website may also contain links to our presence on various social media platforms. As we do not operate or control such platforms, this Notice does not apply to your use of such platforms.

YOUR RIGHTS AS A DATA SUBJECT

If you are a Data Subject about whom we store Personal Data, you have certain data protection rights under applicable privacy laws. We may need to confirm your identity in order to process your request. Your privacy rights include:

- **The right to be informed** – You have the right to obtain from us all information regarding our data processing activities that concerns you, such as how we collect and use your Personal Information, how long we keep it, and with whom it will be shared with, among other things. We are informing you of how we process your Personal Data with this Notice.
- **The right to access** – You can ask us to confirm whether or not we process Personal Data concerning you, and, where that is the case, obtain copies of your Personal Data.
- **The right to correction** – You can ask us to correct or update inaccurate Personal Data concerning you.
- **The right to deletion** – You can ask us to erase your Personal Data in certain circumstances. We will always strive to fulfil your request. However, in certain circumstances, we may not be able to delete your Personal Data due to our obligation to maintain your Personal Data pursuant to a legal obligation. If that is the case, we will consider if there are means to limit how we use your Personal Data.
- **The right to withdraw consent** – You can also withdraw your consent, where consent is the legal basis for processing your Personal Data.
- **The right to object to processing** – You have the right to object to the processing of your Personal Data in circumstances where we rely on our legitimate interest to process your Personal Data. You also have the right to object, at any time, to the processing of your Personal Data for direct marketing purposes.
- **The right to restrict processing** – You have the right to ask us to only use or store your Personal Data for certain purposes. You have this right on certain occasions, such as when you believe the Personal Data is inaccurate or the processing activity is unlawful. This right enables you to ask us to suspend the usage of Personal Data about you, for example, if you want us to establish its accuracy or the reason for processing it.
- **The right to complain to a supervisory authority** – You can complain about our processing of your Personal Data to the relevant data protection authority.


These rights are subject to certain limitations and exceptions. To exercise any of the rights described above, please contact our Information Officer using the contact details


in Section 14 below. Should you feel unsatisfied with our handling of your Personal Data, or about any complaint you have made to us, you have the right to lodge a complaint to the South African Information Regulator.

CONTACT INFORMATION

Privacy Questions & Requests

For all privacy-related inquiries, data access requests, or to exercise your privacy rights:

 **Email:** support@armourybroker.com

 **Company:** Armoury Broker (Pty) Ltd

 **Information Officer:** The Managing Director

Regulatory Authority

If you're not satisfied with how we handle your personal data, you can contact:

South African Information Regulator

Website: <https://inforegulator.org.za>

Policy Updates

We may update this Privacy Policy from time to time to reflect:

- Changes in our business practices
- New legal or regulatory requirements
- Improvements to our services

Notification: When we make material changes, we will:

- Update the "Effective Date" at the top of this policy
- Post the revised policy on our website
- Notify users via email or website notice where appropriate

Your Responsibility: Please review this policy periodically to stay informed about how we protect your information.