

**PRIVACY POLICY** 

JP MARKETS SA (Pty) Ltd

# Date: 01 September 2023

## Version: 1



#### 1. PURPOSE

This Privacy Policy outlines how JP Markets SA (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.



### 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

JP Markets SA 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

JP Markets SA 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 upto-date.

## 6.6 Openness and Transparency

JP Markets SA 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 JP Markets SA will facilitate these rights.



## 7 ROLES AND RESPONSIBILITIES

## 7.1 Data Protection Officer (DPO)

JP Markets SA has a designated Data Protection Officer 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 DPO.

## 8 DATA BREACH RESPONSE

### 8.1 Reporting

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

## 8.2 Investigation and Notification

JP Markets SA will promptly investigate data breaches and, if required by law, notify affected data subjects and regulatory authorities.

## 9 Training and Awareness

## 9.1 Training

JP Markets SA 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.

## 10 Marketing Automation

10.1 JP Markets SA uses the marketing automation platform "Solitics" from https://solitics.com/

- 10.2 Solitics is a marketing automation platform that allows JP Markets SA to send and manage email campaigns across channels and optimize the dissemination of the newsletter to its subscribers.
- 10.3 Solitics collects information based on the requirements laid out by JP Markets SA. They can track three types of information; information received about contacts from JP Markets SA,

JP Markets SA (Pty) Ltd with company registration number: 2016/123297/07 is an authorised financial services provider and over-the-counter derivatives provider (ODP) licensed and regulated by the Financial Sector Conduct Authority (FSCA) of South Africa, with FSP No. 46855. JP Markets SA (Pty) Ltd is authorised to issue the derivatives traded by you the client and therefore is the

counterparty and principal to the contract for difference purchased by you (the Client).



information collected automatically when CUSTOMER interacts with an email form JP Markets SA and information collected from other sources.

10.4 Personal data collected and processed in connection with JP Market's use of Solitics is stored and processed by Solitics, more information on the platform can be found here: <u>https://solitics.com/privacy-policy/</u>

### 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 Hotjar usage

We use Hotjar to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices.

This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf.

For further details, please see the 'about Hotjar' section of Hotjar's support site: www.hotjar.com

#### 13 Contact Us

If you have any questions or concerns regarding this Privacy Policy or your personal information, please contact us at <a href="mailto:support@jpmarkets.co.za">support@jpmarkets.co.za</a>