



# **PROTECTION OF PERSONAL INFORMATION POLICY**



## PRIVACY AND PROTECTION OF PERSONAL INFORMATION POLICY

September 2025

### 1 DEFINITIONS AND INTERPRETATION

- 1.1 **“Personal Information”** refers to any information that identifies or can be used to identify an individual, including but not limited to names, contact details, identification numbers, demographic information, and any other information that can be linked to a specific person.
- 1.2 **“Processing”** means any operation or set of operations performed on personal information, whether automated or manual, including collection, storage, use, disclosure, deletion, or destruction of such information.
- 1.3 **“Responsible Party”** refers to the entity that determines the purpose and means of processing personal information, in this case, VALOR MARKETS (PTY) LTD.
- 1.4 **“Client”** refers to any individual or entity that engages with the services provided by VALOR MARKETS (PTY) LTD, including but not limited to users of the platform, potential clients, and existing customers.
- 1.5 **“Third Party”** refers to any individual or organization that is not a party to this Policy and does not have a direct relationship with VALOR MARKETS (PTY) LTD, including but not limited to service providers, business partners, and external agencies.
- 1.6 **“Cookies”** are small text files that are placed on your device when you visit our website, used to enhance your browsing experience and collect data about your usage patterns.
- 1.7 **“FSP”** stands for Financial Services Provider, which in this context refers to VALOR MARKETS (PTY) LTD.
- 1.8 **“Data Subject”** refers to an individual whose personal information is being processed by VALOR MARKETS (PTY) LTD.
- 1.9 **“Applicable Laws”** refers to the legal frameworks governing the protection of personal information, including the Protection of Personal Information Act (“POPIA”) and any other relevant laws in the Republic of South Africa.
- 1.10 **“Policy”** refers to this Privacy and Protection of Personal Information Policy, which outlines how VALOR MARKETS (PTY) LTD collects, uses, protects, and discloses personal information.



- 1.11 **“You”** and **“Your”** refer to the individual or entity accessing the services of VALOR MARKETS (PTY) LTD, including clients and potential clients.
- 1.12 **“We,” “Us,”** and **“Our”** refer to VALOR MARKETS (PTY) LTD as the organization responsible for processing your personal information in accordance with this Policy.
- 1.13 **“Consent”** refers to any freely given, specific, informed, and unambiguous indication of a Data Subject’s wishes, which signifies agreement to the processing of personal information relating to them.
- 1.14 **“Legitimate Interest”** refers to a lawful basis for processing personal information when it is necessary for the purposes of the legitimate interests pursued by VALOR MARKETS (PTY) LTD, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject.
- 1.15 These definitions are provided to facilitate a clear understanding of the terms used in this policy. Any interpretation of this policy shall be guided by these definitions.
- 1.16 VALOR MARKETS (PTY) LTD is a South African company authorised as a Financial Services Provider (FSP No. 54447). It acts solely as an intermediary and does not perform client onboarding, trading execution, or custody of client funds. These functions are conducted by Valor Markets Ltd, incorporated under the laws of the Union of the Comoros. This Policy applies exclusively to the processing of personal information by VALOR MARKETS (PTY) LTD in respect of its South African regulatory obligations.

## **2 COLLECTION OF PERSONAL INFORMATION**

- 2.1 VALOR MARKETS (PTY) LTD collects personal information only when such information is knowingly and voluntarily submitted by a Data Subject, including clients, service providers, and employees. The Company will inform Data Subjects of the purposes for which the information is being collected.
- 2.2 The Company does not collect personal information for the purpose of account opening, deposits, withdrawals, or trading activities, as these functions are performed exclusively by VALOR MARKETS LTD.



### **3 PURPOSE OF PROCESSING**

- 3.1 VALOR MARKETS (PTY) LTD processes personal information strictly for purposes necessary to comply with South African law, including but not limited to:
- i. Verifying the identity of representatives, affiliates, or clients where required under FAIS or FICA;
  - ii. Fulfilling obligations relating to compliance with anti-money laundering and counter-terrorist financing regulations;
  - iii. Maintaining governance, risk, and compliance records;
  - iv. Managing human resources, employment relationships, and service provider arrangements;
  - v. Responding to statutory requests, complaints, or regulatory investigations.
- 3.2 Personal information is not processed by VALOR MARKETS (PTY) LTD for account maintenance, trading activity, or custody of funds.

### **4 INFORMATION SOURCES**

- 4.1 The Company primarily collects personal information directly from the Data Subject. Where necessary, it may collect information from third-party verification providers, regulators, or publicly available sources.
- 4.2 Where personal information relating to a third party is submitted, the submitting party warrants that the necessary consent has been obtained.

### **5 CATEGORIES OF PROCESSED INFORMATION**

- 5.1 The personal information processed by VALOR MARKETS (PTY) LTD may include, depending on the relationship with the Data Subject:
- i. **Clients:** name, surname, contact details, identification numbers, and intermediary service records.
  - ii. **Service Providers:** registration information, VAT numbers, addresses, banking details.
  - iii. **Employees:** employment records, qualifications, demographic information, and compliance records.



- 5.2 VALOR MARKETS (PTY) LTD does not process client trading, custody, or transactional data, as such information is processed exclusively by VALOR MARKETS LTD.

## **6 YOUR RIGHTS TO PERSONAL INFORMATION**

- 6.1 Data Subjects have the following rights in relation to their personal information:
- i. The right to request access to personal information held by the Company;
  - ii. The right to request correction, deletion, or destruction of personal information;
  - iii. The right to object to processing in terms of section 11(3) of POPIA;
  - iv. The right to withdraw consent previously given;
  - v. The right to lodge a complaint with the Information Regulator of South Africa.
- 6.2 Requests must be submitted to the Company's Information Officer at the details set out in section 13 of this Policy.

## **7 COOKIES AND WEBSITE DATA**

The Company's website may use cookies and similar technologies to enhance the browsing experience and collect limited usage data. Such cookies do not give the Company access to Data Subjects' devices or private information and are used solely for functionality, security, and statistical purposes.

## **8 PRIVACY OF MINORS**

VALOR MARKETS (PTY) LTD does not intentionally process personal information relating to minors. Where processing is unavoidable, it shall be undertaken strictly in accordance with section 35 of POPIA and with the consent of a competent person.

## **9 SECURITIES SAFEGUARDS**

VALOR MARKETS (PTY) LTD implements appropriate technical and organisational measures to protect the confidentiality, integrity, and availability of personal information, including:



- i. Encryption and access controls.
- ii. Secure storage and restricted access protocols.
- iii. Regular monitoring and updating of systems against malware and unauthorised access.
- iv. Confidentiality obligations imposed contractually on employees and service providers.

### **10 DISCLOSURE OF PERSONAL INFORMATION**

- 10.1 The Company shall not disclose personal information to third parties without consent, except where required by law or regulatory obligation. Potential recipients include:
- i. The South African Police Service, for criminal background checks.
  - ii. The Financial Intelligence Centre, in respect of suspicious or unusual transaction reports.
  - iii. The FSCA, in respect of compliance monitoring and reporting.
  - iv. Credit bureaus, for credit checks where relevant to contractual relationships.
- 10.2 The Company will not disclose or transfer personal information to VALOR MARKETS LTD or to any foreign entity except where required to perform its intermediary obligations and where appropriate safeguards are in place.

### **11 RETENTION OF PERSONAL INFORMATION**

Personal information is retained for as long as is necessary to fulfil the purposes set out in this Policy or as required by law. Generally, records are kept for a minimum period of five (5) years from the date of the termination of the business relationship, in line with FICA and FAIS obligations.

### **12 UPDATES AND AMENDMENTS**

This Policy may be reviewed and updated from time to time in order to reflect changes in legislation, regulation, or the operational requirements of the Company. Updated versions shall be published on the Company's website with the date of last revision clearly indicated.



### 13 CONTACT INFORMATION

Any questions relating to the FSPs privacy policy, or the treatment of an individual's personal data may be addressed to the contact details below:

**Email address:** [support@valormarkets.com](mailto:support@valormarkets.com)

**Website:** <https://www.valormarkets.com/>

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