PRIVACY POLICY

1. INTRODUCTION

1.1. Space Markets (Pty) Ltd. (hereinafter "**Space Markets**"), is a Financial Services Provider regulated and authorised in terms of the Financial Advisory and Intermediary Services Act, No. 37 of 2002, and is authorised by the Authority to render Intermediary Services in respect of the Financial Products.

1.2. Space Markets is committed to protecting your personal information in compliance with the Protection of Personal Information Act, No. 4 of 2013, as amended.

1.3. This Privacy Policy outlines how the personal information of a Client is collected, used, stored, and protected by SPACE Markets.

2. DEFINITIONS

2.1. The following definitions -

2.1.1. **"Authority"** means the Financial Sector Conduct Authority of South Africa.

2.1.2. **"Client"** means a person who has entered into an agreement with Space Markets;

2.1.3. **"Personal Information**" means, any information that identifies a person, such as name, contact details, identity number, financial details, and regulatory information;

2.1.4. "**Processing**" means any operation performed on personal information, including collection, storage, updating, sharing, or deletion;

2.1.5. "**Responsible Party**" means SPACE Markets, which determines the purpose and means of processing personal information;

2.1.6. "**Data Subject**" means any individual or entity whose personal information is collected, processed, or stored by Space Markets;

2.1.7. "**POPI Act**" means the Protection of Personal Information Act, No. 4 of 2013, as amended;

2.1.8. "**Regulator**" means the Information Regulator of South Africa; and,

2.1.9. "**Third Party**" means any external entity with whom personal information is shared, such as regulatory authorities, service providers, or business partners.

3. SCOPE AND APPLICATION

3.1. This Privacy Policy applies to all clients, prospective clients, business partners, service providers, employees, and any other persons whose personal information we process in connection with our services.

4. COLLECTION OF PERSONAL INFORMATION

4.1. We collect personal information directly from you, through third parties, or through regulatory databases where required. The types of personal information we may collect include:

4.1.1. Full name and identity document details;

4.1.2. Contact details (email, phone number, address);

4.1.3. Financial information, including bank account details;

4.1.4. Regulatory information required or held by the Authority;

4.1.5. Employment and company details (where applicable);

4.1.6. Risk and compliance-related information; and,

4.1.7. Any other information required to fulfil our regulatory obligations.

5. PURPOSE OF PROCESSING PERSONAL INFORMATION

5.1. We collect and process personal information for the following purposes:

5.1.1. To comply with regulatory and legal obligations, including the Authority's requirements and/or in compliance with the Financial Intelligence Centre Act, No. 38 of 2001, as amended;

5.1.2. To facilitate our due diligence, onboarding, and risk assessment processes;

5.1.3. To provide, manage, and improve our financial services and products;

5.1.4. To communicate with you regarding our services;

5.1.5. To detect, prevent, and report fraudulent or suspicious activities;

5.1.6. To maintain internal business records and operational processes;

5.1.7. To comply with requests from regulators, law enforcement, and other legal authorities; and,

5.1.8. To provide services to you as per agreements.

6. LEGAL BASIS FOR PROCESSING

6.1. We process personal information in line with POPI Act under the following legal bases:

6.1.1. Consent – Where you have given us explicit permission to process your personal information;

6.1.2. Legal Obligation – Where processing is required to comply with laws and regulations;

6.1.3. Contractual Necessity – Where processing is necessary to perform our contractual obligations; and,

6.1.4. Legitimate Interest – Where we have a legitimate business interest that does not override your rights.

7. SHARING AND DISCLOSURE OF PERSONAL INFORMATION

7.1. We may share your personal information with:

7.1.1. Regulatory authorities such as the Authority, the South African Revenue Service, and the Financial Intelligence Centre;

7.1.2. Third-party service providers who assist us with compliance, IT, data storage, and operational support;

7.1.3. Financial institutions and payment service providers for transaction processing;

7.1.4. Law enforcement or other parties when required by law; and,

7.1.5. Business partners in connection with contractual obligations.

8. DATA STORAGE AND SECURITY MEASURES

8.1. Space Markets takes appropriate security measures to protect your personal information from loss, misuse, unauthorised access, disclosure, or alteration. These measures include:

8.1.1. Secure data encryption and storage mechanisms;

8.1.2. Access controls and authentication measures;

8.1.3. Regular security assessments and compliance audits; and,

8.1.4. Secure third-party service provider agreements.

9. ENFORCEMENT OF SECURITY MEASURES

9.1. We enforce security measures by conducting regular security audits, employee training, and ensuring compliance with industry standards. Any breach of our security policies by employees or third parties is subject to disciplinary action or termination of contracts where applicable.

10. DATA BREACHES

10.1. In the event of a data breach that compromises personal information, we will notify affected individuals and relevant authorities as required by POPI Act. Notifications will include details of the breach, potential risks, and any remedial actions taken.

11. CONSENT

11.1. We will obtain your explicit consent before using your personal information for marketing or sharing it with third parties for purposes other than those stated in this policy. You may opt out of marketing communications at any time by contacting us.

12. CROSS-BORDER TRANSFER OF INFORMATION

12.1. Where personal information is transferred outside of South Africa, we ensure that such transfers comply with POPI Act by implementing appropriate safeguards, such as contractual clauses or regulatory approvals.

13. YOUR RIGHTS UNDER POPI ACT

13.1. Under the POPI Act, you have the following rights, the:

13.1.1. Right to Access – Request a copy of your personal information;

13.1.2. Right to Correction – Request correction of inaccurate or outdated information;

13.1.3. Right to Deletion – Request deletion of personal information under certain conditions;

13.1.4. Right to Object – Object to the processing of your information on reasonable grounds;

13.1.5. Right to Restriction – Request that we limit how we process your information; and,

13.1.6. Right to Withdraw Consent – Withdraw consent where processing is based on consent.

14. RETENTION OF PERSONAL INFORMATION

14.1. We retain personal information only for as long as necessary to fulfil the purposes outlined in this policy, comply with legal obligations, or resolve disputes. Once no longer required, data will be securely disposed of.

15. CHANGES TO THIS PRIVACY POLICY

15.1. We may update this Privacy Policy from time to time to reflect changes in legal requirements, operational practices, or security measures. The latest version will be available on our website.

15.2. All changes and updates to this Privacy Policy are reflected below:

15.2.1.	Version:	First.
15.2.2.	Date implemented:	28 April 2025.
15.2.3.	Description of changes:	None.
15.2.4.	Owned by:	Michail Le Roux
15.2.5.	Approved by:	Michail Le Roux

16. CONTACT INFORMATION

16.1. For any questions, requests, or complaints regarding this Privacy Policy or the processing of your personal information, please contact our Information Officer:

16.1.1.	Information Officer:	Michail Le Roux
16.1.2.	Physical address:	Sasol Building 50 Katharine Street Sandton Johannesburg 2196

16.1.3. Email address: michail@spacemarkets.io

16.1.4. For the attention of: Michail Le Roux

16.2. By engaging with Space Markets, you acknowledge that you have read, understood, and agreed to the terms of this Privacy Policy.