



Protection of Personal Information Policy

Version 2, November 2024

INTRODUCTION

JME FINANCIAL SERVICES (PTY) LTD (“the Company/we/our/NAGA”). The Company is licenced by the South African Financial Sector Conduct Authority (“FSCA”) with licence number 37166. The Company is committed to protecting individuals’ personal data in line with the requirements of personal information, in terms of the Protection of Personal Information Act No.4 of 2013 (the “Law”).

It is the Company’s intention that this policy will protect an individual’s personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa. This Protection of Personal Information (“POPI”) Policy explains how the Company will obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act (the “Act”).

DEFINITIONS

“**Data Subject**” means the person to whom personal information relates;

“**Direct Marketing**” means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of—

- (a) promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or
- (b) requesting the data subject to make a donation of any kind for any reason

“**Information Officer**” of, or in relation to, a—

- (c) public body means an information officer or deputy information officer as contemplated in terms of section 1 or 17; or
- (d) private body means the head of a private body as contemplated in section 1, of the Promotion of Access to Information Act;

“Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to —

- (e) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- (f) information relating to the education or the medical, financial, criminal or employment history of the person;
- (g) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (h) the biometric information of the person;
- (i) the personal opinions, views or preferences of the person;
- (j) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- (k) the views or opinions of another individual about the person; and
- (l) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

“Processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including —

- (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- (b) dissemination by means of transmission, distribution or making available in any other form;
or
- (c) merging, linking, as well as restriction, degradation, erasure or destruction of information.



OVERVIEW

The objective of this Policy is to protect the Company's information assets from threats, whether internal or external, deliberate or accidental, to ensure business continuity, minimise business damage, and to maximise business opportunities, as well as to ensure the continued protection of our client's personal information.

This Policy describes what types of personal information we collect about you when you choose to use our services, how we will use your personal data, when and with whom we share it and how we will keep it safe. It also details your rights in respect of our processing of your personal information and how you may exercise them. Please take the time to read and understand this policy. The Policy is made available on the Company's website, www.naga.com/za, and by request from the Company's Information Officer.

PERSONAL INFORMATION COLLECTED

The Company collects information directly from you where you provide us with your personal information, for example when you purchase a product or services from us or when you submit enquiries to us or contact us.

The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, we will inform the client as to the information required and the information deemed optional.

When you open an account with the Company, we require you to provide your first and last name, e-mail address, details about your financial status, your residential address, phone number, date of birth, a copy of your national identity card or passport or driving license, a copy of a recent utility bill/bank statement (or similar) as evidence of your residential address, credit card or bank card details, Tax residence and Tax Identification Number, profession and employment details, knowledge and experience in trading, risk tolerance and risk profile and other information we may consider

necessary to our functions and activities and in order to be in a position and be permitted to provide our services to you.

If you have not created an account with the Company and request for a Chat session, you will be required to provide your e-mail address, first and last name. Any further personal data (including text, files etc.) that may be provided during the Chat session will be stored for quality monitoring, training and regulatory purposes.

We use cookies to store and collect information about your use of our website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience. You can find out more about our cookies on our "Cookies Policy" available on our website.

If you are a corporate client, we are required to collect information related to the legal entity (e.g. corporate and constitutional documents), additional personal information on the shareholders, directors and other officers that we deem as necessary in order to be compliant with our legal and regulatory requirements. We record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us.

HOW WE USE CLIENT INFORMATION

We will use your personal information only for the purpose of rendering financial services to you and for the purpose for which it was collected or agreed with you, for example:

- to effectively process your transactions;
- to identify and verify your identity;
- to communicate to you in respect of your funds invested with the Company;



- to comply with legal and regulatory requirements;
- to comply with auditing and record-keeping requirements;
- to detect and prevent fraud;
- to share information with service providers with whom the Company has a business agreement to process such information on the Company's behalf or to those who render services to the Company.

TO WHOM WE DISCLOSE CLIENT INFORMATION

We may engage with other organisations to provide support services to the Company. Third parties are obliged to respect the confidentiality of any personal information held by us. The Company shall not disclose your personal information to any product or third-party service providers unless agreements are in place to ensure that all service providers comply with these confidentiality and privacy terms.

We may disclose your information where we have a duty or right to disclose your information in terms of applicable legislation, or where it is necessary to protect our legal rights.

HOW WE SAFEGUARD CLIENT INFORMATION

We are legally obliged to provide adequate protection for our clients' personal information. We will, on an ongoing basis, continue to review our security controls and related processes in order to ensure your personal information is secure.

The Company implements appropriate technical and organisational measures such as data encryption, access management procedure, clean desk policy, business continuity and disaster recovery, IT systems risk assessment, physical and logical access segregation, process in case of personal data breach policy, etc. Additionally, the Company limits access to the Client's personal data to those employees, agents, contractors and other third parties who have a business need to know.



When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We strive to ensure the security, integrity and privacy of any personal information submitted by a client or prospective client. We will review and update our security measures in accordance with future legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, we will endeavour to take all reasonable steps to protect the personal information, which a client submits to us. We will always set the highest standards to ensure the integrity of our systems. The Company will not be held responsible for the loss, destruction, or disclosure of a client's personal information due to a force majeure event.

ACCESS AND CORRECTION OF INFORMATION

Clients have the right to access the personal information the Company holds about them. Clients also have the right to ask the Company to update, correct or delete their personal information on reasonable grounds. Once a client objects to the processing of their personal information, we may no longer process said personal information. We will take all reasonable steps to confirm our clients' identity before providing details of their personal information or making changes to their personal information.

AMENDMENTS TO THIS POLICY

Amendments to, or a review of this Policy, will take place on an ad hoc basis or at least once a year. Clients are advised to access the Company's website periodically to keep abreast of any changes. Where material changes take place, clients will be notified directly, or changes will be stipulated on our website.



CONTACT INFORMATION

If you have questions about this Policy or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the following number:

INFORMATION OFFICER DETAILS

Name: Brett von Buddenbrock

Telephone number: 078 335 2335

E-mail address: bvonjme@gmail.com

COMPANY CONTACT DETAILS

Telephone number: 0040 724 311 322

Postal address: Suite 10, 21 Lighthouse Rd 201 Beacon Rock, Umhlanga Rocks, Kwa-Zulu Natal, 4320, South Africa

Physical address: Suite 10, 21 Lighthouse Rd 201 Beacon Rock, Umhlanga Rocks, Kwa-Zulu Natal, 4320, South Africa

E-mail address: support.za@naga.com

Website: www.naga.com/za