



QBM
QUBEMARKETS

Privacy Policy QubeMarkets

Version: 24 August 2025



Privacy Policy

1. Introduction

This Privacy Policy explains how Qube Markets Group (Pty) Ltd and its affiliates (collectively, "Qube", "we", "our", or "us") collect, use, store, disclose, and protect your personal information. We are committed to protecting your privacy and ensuring compliance with applicable data protection and privacy laws and other applicable global standards.

2. Who We Are

Qube Markets Group (Pty) Ltd is a financial services company incorporated in South Africa, regulated by the Financial Sector Conduct Authority (FSCA). Depending on your jurisdiction, your personal data may be processed by one or more Qube entities licensed and regulated under applicable local laws. The entity responsible for your personal data will be the one providing services directly to you.

3. Personal Data We Collect

We may collect and process the following categories of personal information:

- Identity information: name, username or similar identifier, date of birth, nationality, identification documents, and proof of address.
- Contact details: email address, phone number, postal address, and billing address.
- Financial information: bank account details, payment card details, income information, tax identification.
- Transaction and trading data: account activity, trading history, preferences, and risk profile.
- Technical information: IP address, device identifiers, operating system, and browser type.
- Usage Data: information about how you use our website, products and services, registration date, account category, trading cluster, number of complaints, number of requests filed and IP history.
- Communication data: records of correspondence, customer service requests, and complaints.
- Location Data: details on your actual location when interacting with our website

(for example, a set of parameters that determine regional settings of your interface, namely residency country, time zone, and the interface language).

- Any other information required by applicable law (e.g., AML/KYC obligations).

4. How We Collect Personal Data

We collect personal data directly from you when you open an account, use our services, communicate with us, or submit documentation. We may also obtain information from third-party sources such as identity verification service providers, credit reference agencies, regulatory authorities, publicly available databases, and business partners. We may use cookies and similar technologies to collect technical and usage information when you access our website or applications.

We will not collect sensitive information about you without your consent, unless the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services or meet your needs appropriately.

5. Purposes of Processing Personal Data

We process your personal data for the following purposes:

- To verify your identity and comply with KYC/AML obligations.
- To provide, maintain, and improve our services.
- To perform our contractual obligations with you.
- To monitor and analyze transactions to detect and prevent fraud, money laundering, and terrorist financing.
- To communicate with you about your account, provide support, and respond to inquiries.
- To comply with applicable legal, regulatory, and tax requirements.
- To send marketing and promotional communications where legally permitted and subject to your preferences.
- To conduct internal research, risk management, and business development.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or required or authorised by law.

6. Sharing of Personal Data

We may share your personal data with the following categories of recipients:

- Affiliates within the Qube group of companies.
- Service providers including IT, payment processing, cloud storage, marketing, and analytics providers.
- Professional advisors such as auditors, legal counsel, and consultants.
- Regulatory authorities, law enforcement agencies, courts, or other governmental bodies where required by law.
- Business partners or counterparties involved in the provision of services to you.

We require all third parties with whom we share your data to maintain confidentiality and implement appropriate data protection measures.

7. International Data Transfers

Your personal information may be stored and processed in any country where we have facilities or in which we engage operators in accordance with the applicable data protection laws and regulations.

Whenever we transfer your personal information, we ensure a similar degree of protection is afforded by implementing at least one of the following safeguards:

- We will only transfer your personal information to third parties in countries that are subject to laws or binding corporate rules that provide an adequate level of protection for personal information that effectively upholds the principles of reasonable processing as required under applicable data protection laws;
- In the absence of an adequate level of protection, we will either put data transfer measures in place with the foreign third party to effectively protect the processing of your personal information or we will seek your consent.

8. Data Security

We implement robust technical and organizational measures to protect your personal information, including encryption, firewalls, intrusion detection, multi-factor authentication, secure servers, and regular vulnerability testing (PCI DSS compliance). Despite these measures, no system is completely secure, and you acknowledge that the transmission of data via the internet is at your own risk.

In addition, we limit access to your personal data to those who have a genuine need

to access it. They will only process your personal data on our instructions, and they are subject to confidentiality obligations. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. Data Retention

We will retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including to satisfy legal, accounting, or reporting requirements. For example, AML/KYC regulations may require us to retain identification data for at least five years after termination of the business relationship. When data is no longer required, we will securely delete or anonymize it.

10. Your Rights

Depending on your jurisdiction, you may have the following rights regarding your personal data:

- Right of access: to obtain a copy of your personal data.
- Right to rectification: to correct inaccurate or incomplete data.
- Right to erasure: to request deletion of your data under certain conditions.
- Right to restrict processing: to limit how we process your data.
- Right to object: to object to certain processing activities, including direct marketing.
- Right to data portability: to receive your data in a structured, machine-readable format.
- Right to withdraw consent: where processing is based on your consent.

We will respond to all valid requests in accordance with applicable laws.

If you instruct us to cease using or processing your personal data, we have the right to terminate any existing services for you within a reasonable time or immediately, as determined by the Company.

11. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to enhance user experience, analyze site usage, and deliver personalized content and advertising. You can manage your cookie preferences through your browser settings or via our cookie

management tool, but disabling cookies may affect the functionality of our services.

12. Changes to this Privacy Policy

We may update this Privacy Policy periodically to reflect changes in our practices, technologies, legal requirements, or other factors. Any updates will be published on our website, and where required by law, we will notify you of significant changes. Please review this policy regularly to stay informed.

13. Contact Us

If you have questions about this Privacy Policy, wish to exercise your data protection rights, or lodge a complaint, please contact us.