

MULA MARKETS (PTY) LTD

FSP 53319

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WWW.MULA.CO.ZA

PRIVACY POLICY

Introduction

Welcome to our Privacy Policy. We are Mula Markets (Pty) Ltd (Registration number 2023/695155/07), an authorised Financial Services Provider (FSP No. 53319) rendering intermediary services in respect of Category I Derivative Instruments (Cat A). This is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe how we collect, store, use, and protect information that can be associated with you, or another specific natural or juristic person, and that can be used to identify you or that person ("personal information").

All client trading accounts, transactions, and funds are held with our licensed OTC Derivatives Provider partner ("the ODP Provider"), who acts as principal counterparty to your trades. Mula acts as intermediary and performs onboarding, Customer Due Diligence, and Anti-Money Laundering checks on your behalf, under the oversight of the ODP Provider's designated Money Laundering Reporting Officer.

Audience

This policy applies to you if you are:

- a visitor to our website;
- a user of our social media and electronic platforms;
- an employee, contractor, service provider, or other third party; or
- a client who requests or uses the intermediary services that we provide in respect of derivative instruments.

This policy also applies if you contact us in any manner, including by email.

Personal Information We Collect

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration (see below);
- certain information collected on submission, including as part of a suitability assessment or FICA verification; and
- optional information that you provide to us voluntarily (see below);

but excludes information that has been made anonymous so that it does not identify a specific person, permanently de-identified information that cannot be traced back to you, and non-personal statistical information that we collect and compile.

Common examples

Common examples of the personal information we may collect and process include your:

- identifying information — such as your name, date of birth, or identification number;
- contact information — such as your phone number or email address;
- address information — such as your physical or postal address; and
- demographic information — such as your gender or marital status.

Special personal information

Depending on the services you require, we may also collect special personal information including your:

- financial information — such as your bank account details, income, assets, liabilities, and investment objectives, relevant to suitability and affordability assessments;
- criminal information — such as information relevant to sanctions screening, Customer Due Diligence, and Anti-Money Laundering checks; and
- sensitive demographic information — such as your race or ethnicity, where required for identity verification.

Acceptance

Acceptance required

You must accept all the terms of this policy when you use or request our services, use our website or any site housed under its domain, use our social media platforms, or send or receive emails from us. If you do not agree with anything in this policy, you may not do any of the above.

Legal capacity

You may not access our website or social media platforms, or use or request our services, if you are younger than 18 years old or do not have the legal capacity to conclude legally binding contracts.

Your obligations

You may only send us your own personal information, or that of another data subject where you have their permission to do so. Where a data subject is under the age of 18, we will only process their personal information where a competent person (such as a parent or legal guardian) has given the required consent.

Changes

We may change the terms of this policy at any time by updating this document. We will notify you of material changes by placing a notice in a prominent place on our website, or by email. If you continue to use our website, platforms, or services after notification of a change, you will be deemed to have accepted the updated terms.

Collection

On registration

Once you register on our website, you will provide us with certain personal information, including your name and surname, email address, telephone number, and postal or street address, along with your username and password. We use this to fulfil your account and to provide services to you.

Use or request

When you use our platforms, or use or request our intermediary services — including opening a trading account — you will be asked to provide additional information on a voluntary basis.

From your browser

We automatically receive and record internet usage information from your browser, such as your IP address, browsing habits, click patterns, system type, and the pages and content you access on our website, together with the dates and times of your visits ("usage information").

Cookies

For information on how we use cookies, please refer to our Security Policy.

Recording calls

We may monitor and record telephone calls you make to us, unless you specifically request that we do not.

Optional details

You may also provide additional information to us voluntarily, such as content you upload, or information you provide when you contact us, respond to surveys, or otherwise use the features of our website.

Purpose and Use

We collect and process your personal information for purposes including:

- providing and managing our intermediary services, and improving the quality of our services;
- marketing purposes, in line with your consent;
- verification purposes — to identify or verify you, including FICA verification;
- suitability purposes — to assess whether our services are appropriate for you;
- administration and business purposes, including internal audit, accounting, and business planning;
- security purposes — to detect and prevent fraud and money laundering;
- financial purposes — to recover unpaid fees or other amounts due to us; and
- legal or regulatory purposes — such as complying with the FAIS Act, FICA, POPIA, and other applicable law.

We will not send you promotional messages unless you have opted in to receive them, though we may send you one message inviting you to opt in.

Disclosure

Sharing

We may share your personal information with:

- our OTC Derivatives Provider partner, who holds and executes your trading account, for ongoing account administration, trade execution, and as part of the onboarding, Customer Due Diligence, and Anti-Money Laundering checks that Mula performs on your behalf under its oversight;
- our service providers under contract, who help us provide services or run parts of our operations, including payment processing, fraud prevention, and technology services;
- credit bureaux, to report account information as permitted by law;
- banking and payment partners, as required to process your transactions; and
- other third parties who provide us with relevant services, where appropriate.

Regulators and law enforcement

We may disclose your personal information as required by law or governmental audit, including to the Financial Sector Conduct Authority and the Financial Intelligence Centre, or where required by a subpoena or court order, to comply with any law, to prevent fraud or corruption, or to protect the safety of any individual or the public.

No selling

We do not sell your personal information. Your information is not disclosed to anyone except as described in this policy.

Change of ownership

If we undergo a change in ownership, merger, acquisition, or sale of assets, we may transfer your personal information to a successor or purchaser. We will disclose any such transfer on our website. If you are concerned about your information transferring to a new owner, you may request that we delete it, subject to our regulatory record-keeping obligations.

Security and Retention

We take the security of your personal information seriously and apply appropriate technical and organisational measures to protect it against unauthorised access, loss, or destruction. Further detail on our security measures is set out in our Security Policy.

We will only retain your personal information for as long as necessary to fulfil the purposes set out in this policy, unless retention is required or authorised by law — including record-keeping requirements under FAIS and FICA — or you have consented to further retention.

Cross-border transfer

We do not currently perform cross-border transfers of personal information. Should this become necessary, we will take reasonable steps to implement appropriate safeguards — such as contractual agreements or data protection impact assessments — and will ensure the recipient agrees to be bound by the data transfer requirements of POPIA.

Your Rights

You have the right to access, correct, or request the deletion of your personal information, and to object to its processing, subject to our regulatory record-keeping obligations. You may update or correct your information by contacting us. Please note that we may take steps to verify your identity before granting access or making corrections, to protect your information.

You may contact our Information Officer at compliance@mula.co.za should you have any questions, complaints, or objections regarding the processing of your personal information, or if you wish to exercise any of your rights under POPIA.

Enquiries

If you have any questions or concerns arising from this Privacy Policy or how we handle your personal information, please contact our Information Officer at compliance@mula.co.za or on 066 170 9442.