VERSION 2.0

MAY 2026

Privacy Notice

Protection of Personal Information Act (POPIA) — South Africa — and General Data Protection Regulation (GDPR) — European Union — applicable to all RaiseFX regulated entities and their appointed Authorized Representatives.

RESPONSIBLE PARTY (POPIA)

Raise Global SA (Pty) LTD

Reg. 2018/616118/07 · South Africa

FSCA Licence n° 50506

DATA CONTROLLER (EU REPRESENTATIVE)

Raise EU Services D.B LTD

Reg. HE428723 · Cyprus

Acting as Authorized Representative for EU data subject correspondence under GDPR Art. 27.

VERSION

2.0

EFFECTIVE DATE

19 May 2026

INFORMATION OFFICER

Kevin D. Wides

privacy@raisefx.com

REVIEW CYCLE

Annual, or upon regulatory change

PRIVACY & DATA PROTECTION

How RaiseFX Handles Your Personal Information

This Notice satisfies the disclosure requirements of POPIA (South Africa) and GDPR Articles 13 and 14 (European Union). It tells you what we collect, why, on what legal basis, for how long, with whom we share it, and how to exercise your rights.

1 Who We Are & Scope

This Notice applies to all entities operating under the RaiseFX brand. **Raise Global SA (Pty) LTD** is the **Responsible Party** under POPIA and the **Data Controller** for all client data processed in connection with investment services. **Raise EU Services D.B LTD** acts as the Group's **Authorized Representative** in the EU under an Authorized Representative Agreement, and as the designated representative under GDPR Article 27 for the purposes of correspondence with EU data subjects and supervisory authorities.

2 Personal Information We Process

CATEGORY	EXAMPLES
Identity data	Full name, date of birth, nationality, residential address, personal/national identification number, government-issued photo ID and MRZ data.
Contact data	Email address, telephone number, postal address, preferred language.
Financial data	Source of funds and source of wealth documentation, bank account details, payment instrument data (masked card data), trading activity, profit/loss, deposits and withdrawals.
Suitability & profile data	Investment experience, knowledge, risk appetite, declared monthly turnover band, employment status.
Verification & biometric data	Liveness-check images, face-match results, document authenticity outcomes from the iDenfy platform.
Screening data	Sanctions, PEP and adverse-media screening results, accuracy scores, manual review notes.
Technical data	IP address, device identifier, geolocation, browser type, operating system, session timestamps, VPN/proxy detection signals.
Communications data	Email, in-app messages, recorded voice calls (where required by FAIS or CySEC record-keeping rules), chat transcripts with support.

We do not knowingly collect **special categories** of personal data within the meaning of GDPR Art. 9 or POPIA s. 26. Biometric data collected during identity verification is processed strictly to comply with anti-money-laundering law, on the lawful basis set out below.

3 Purposes and Lawful Basis

PURPOSE	CATEGORIES USED	LAWFUL BASIS
Account opening & identity verification	Identity, contact, verification, biometric, screening.	POPIA s.11(1)(b); GDPR Art. 6(1)(c) — legal obligation under FICA, FSCA Conduct Standards, AMLR, AMLD6.
Provision of trading and payment services	Identity, contact, financial, suitability, communications.	POPIA s.11(1)(b); GDPR Art. 6(1)(b) — performance of the Client Agreement.
AML/CFT screening & transaction monitoring	Identity, financial, screening, technical.	POPIA s.11(1)(c); GDPR Art. 6(1)(c) — legal obligation.
Suitability & appropriateness assessment	Suitability, financial.	POPIA s.11(1)(b); GDPR Art. 6(1)(c) — regulatory requirement.
Fraud prevention & security monitoring	Identity, technical, communications.	POPIA s.11(1)(f); GDPR Art. 6(1)(f) — legitimate interests.
Regulatory reporting & record-keeping	All categories as required.	POPIA s.11(1)(c); GDPR Art. 6(1)(c) — FICA, FAIS, FSCA, CySEC, AMLR/AMLD6.
Service improvement & analytics	Technical, communications, anonymised trading data.	POPIA s.11(1)(f); GDPR Art. 6(1)(f) — legitimate interests.
Direct marketing	Contact, communications.	POPIA s.69 / GDPR Art. 6(1)(a) — consent. Withdrawable at any time.

4 Recipients & Sharing

We share personal information only where lawful and necessary, with the following categories of recipient:

- **Intra-Group** — Raise Global SA (Pty) LTD and Raise EU Services D.B LTD share data on the basis of joint controllership for client services and as part of the Authorized Representative arrangement.

- **Identity-verification provider** — iDenfy (processor) for KYC/AML document and biometric checks.
- **Payment service providers, banks, card networks** — for deposits, withdrawals, refunds and reconciliation.
- **Cloud and IT infrastructure providers** — hosting, backup, security monitoring, under processor agreements.
- **Regulators and competent authorities** — FSCA, FIC, SARB, AMLA (EU), CySEC, MOKAS (Cyprus), and law-enforcement bodies under court order or statutory powers.
- **External auditors and legal advisors** — under professional confidentiality.

We do **not sell** personal data to third parties.

> **INTRA-GROUP DATA FLOW**
>
> Personal data of EU-resident clients onboarded via Raise EU Services D.B LTD is transferred to Raise Global SA (Pty) LTD in South Africa under the safeguards set out in Section 5 (cross-border transfers).

5 Cross-Border Transfers

Where personal data is transferred from the European Economic Area or the United Kingdom to South Africa, or onward to other jurisdictions where our processors operate, the transfer is made under one of the following GDPR Chapter V safeguards:

- **Standard Contractual Clauses** (Commission Implementing Decision (EU) 2021/914) executed with the receiving Group entity or processor;
- **Adequacy decision**, where the destination jurisdiction has been recognised as adequate by the European Commission;
- **Necessity** exceptions under GDPR Art. 49 for occasional transfers necessary for the performance of a contract or for the establishment, exercise or defence of legal claims.

Under POPIA s.72, transfers outside South Africa are made only where the recipient is subject to a law, binding corporate rules or binding agreement providing an adequate level of protection, where the transfer is necessary for the performance of a contract, or where the data subject has consented.

6 Retention Periods

CATEGORY	RETENTION	STATUTORY BASIS
KYC documents & verification records	**5 years** from account closure	FICA s.23; AMLR Art. 56.
Transaction records	**5 years** from date of transaction	FICA s.23; AMLR Art. 56.
STR / SAR reports	**5 years**	FICA s.29; AMLR Art. 50.
Recorded calls & trading-related electronic communications	**5 years** (extendable to 7 on regulator request)	FSCA Conduct Standards; MiFID II Art. 16(7).
Suitability and appropriateness records	**5 years** from end of relationship	FAIS General Code of Conduct; MiFID II.
Complaint records	**5 years** from resolution	FAIS Rules on Proportionate & Effective Resolution of Complaints.
Marketing-consent records	Until consent withdrawn + **1 year**	POPIA s.69; GDPR Art. 7(3).
Website analytics & security logs	**13 months**	Legitimate interests; ePrivacy guidelines.

Once the retention period expires, personal data is securely deleted or irreversibly anonymised.

7 Your Rights

Subject to the limits set out in POPIA and the GDPR, you have the right to:

- **Access** your personal information and obtain a copy in a portable format.
- **Correct or update** inaccurate or incomplete data.
- **Object** to processing based on legitimate interests or for direct marketing.
- **Erase** personal data where there is no overriding legal obligation requiring retention (e.g. FICA / AMLR records).
- **Restrict** processing while a dispute is under review.
- **Withdraw consent** for marketing or any other consent-based processing at any time, without affecting the lawfulness of processing carried out before withdrawal.

- **Data portability** (GDPR Art. 20) for data you have provided to us and that we process by automated means on the basis of contract or consent.
- **Lodge a complaint** with a supervisory authority (see Section 12).

To exercise any right, contact the Information Officer at **privacy@raisefx.com**. We respond within 30 calendar days, or 1 month under the GDPR (extendable by a further 2 months for complex requests with notification).

8 Direct Marketing

Where required by POPIA s.69 or GDPR Art. 6(1)(a) and the ePrivacy Directive, we send marketing communications only with your prior **opt-in consent**. Each marketing email contains an unambiguous one-click unsubscribe mechanism. You may also withdraw consent at any time by emailing **privacy@raisefx.com**. Existing-customer marketing relating to similar trading services may be sent on a soft-opt-in basis to existing clients, with the same right to opt out.

9 Automated Decision-Making

Account onboarding involves automated checks (document authenticity, face match, sanctions/PEP/adverse-media screening, geographic-risk scoring). Where an automated outcome would lead to an **account refusal or PROHIBITED classification**, the outcome is subject to **human review by the MLRO or designated Compliance Officer** before becoming final. You have the right under GDPR Art. 22 to request human intervention, to express your point of view, and to contest any decision based solely on automated processing.

10 Cookies & Tracking

Our website uses strictly necessary cookies (for session management and security), preference cookies, and — with your prior consent — analytics and performance cookies. A separate **Cookie Notice** sets out the categories, providers and retention of each cookie used. Consent can be managed at any time via the cookie banner.

11 Security

We apply technical and organisational measures appropriate to the risks of processing, including encryption in transit and at rest, role-based access controls, least-privilege principles, periodic security testing, security incident detection and response procedures, and regular staff training. Notwithstanding these measures, no transmission over the internet is entirely secure; you are encouraged to use strong passwords and enable multi-factor authentication on your account.

12 Children's Data

Our services are not directed at, and we do not knowingly process personal data of, persons under the age of **18**. Should we become aware that we have inadvertently collected such data, we will delete it without undue delay.

13 Information Officer / Data Protection Officer

Information Officer (POPIA)	Kevin D. Wides · Raise Global SA (Pty) LTD `privacy@raisefx.com`
EU Representative (GDPR Art. 27)	Raise EU Services D.B LTD, Limassol, Cyprus `privacy@raisefx.com`

14 Complaints to the Supervisory Authorities

Without prejudice to your right to contact us first, you may lodge a complaint with the competent supervisory authority for your jurisdiction:

JURISDICTION	AUTHORITY & CONTACT
South Africa	Information Regulator (South Africa) JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 `enquiries@inforegulator.org.za` · `inforegulator.org.za`
European Union	Office of the Commissioner for Personal Data Protection (Cyprus) 1 Iasonos Street, 1082 Nicosia, Cyprus `commissioner@dataprotection.gov.cy` · `dataprotection.gov.cy` *EU data subjects may also lodge a complaint with the supervisory authority of their habitual residence.*

15 Changes to This Notice

We may amend this Notice from time to time to reflect changes in law, our services or our processing activities. The version published on raisefx.com is the current version. Where changes are material, we will notify you via the contact details on file before the changes take effect.

APPROVAL & SIGN-OFF

APPROVED BY	David BOTTIN
POSITION	Chief Executive Officer (CEO) — RaiseFX Group
SIGNATURE	
APPROVED BY	Kevin Douglas Wides
POSITION	Key Individual & FICA Compliance Officer — Raise Global SA (FSCA n° 50506)
SIGNATURE	
DATE	19 May 2026

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INFORMATION OFFICER
Kevin D. Wides

REGULATOR
FSCA n° 50506 · Cyprus DPA

— End of Notice —