



Privacy Notice & Paia Manual

The protection of privacy and the safeguarding of our Clients' Personal Information is of fundamental importance to us. If you have any questions or require further details regarding this Privacy Notice & PAIA Manual ('Notice') or the processing of your Personal Information, please contact our Compliance Officer at: Compliance@riyadex.com



Who we are:

Riyadex Financials (Pty) Ltd (hereinafter referred to as the 'Company', 'We', or 'Riyadex') is a registered private company incorporated in South Africa under registration number K2021775225, having its official registered office address at 1 Edgemere Road, Elfindale, Cape Town, Western Cape, 7945, South Africa.

The Company is authorized and regulated by the Financial Sector Conduct Authority ('FSCA') under license number FSP52504 :

a) to act as a Financial Services Provider (FSP No. 52504) offering advisory and intermediary non-discretionary services covering equity shares and derivative financial instruments. In accordance with this statutory license, the Company may establish contractual execution arrangements with third-party institutional entities ('Product Suppliers') and operate as an intermediary broker on behalf of such Product Suppliers, where all marketed products are underwritten by the Product Supplier acting as Principal.

b) to act as an Over-the-Counter Derivatives Provider ('ODP') issuing and providing CFD trading facilities as Principal across underlying asset classes, including Foreign Exchange, Market Indices, Energy/Commodities, and Equities. Under these operational scenarios, all financial instruments marketed by the Company are issued directly by the Company acting as Principal.

The objective of this Privacy Notice & PAIA Manual is to inform you regarding:

- 1) The legal frameworks authorizing or obligating the collection of personal information;
- 2) The specific categories of Personal Information we collect;
- 3) The operational purposes for processing your Personal Information;
- 4) How, with whom, and under what circumstances your Personal Information is shared;
- 5) Your statutory data subject rights; and
- 6) Additional relevant privacy, data security, and governance disclosures.

This Notice applies to active and prospective clients, former clients who have ended their contractual relationship with Riyadex, as well as online visitors accessing or using the Riyadex website, digital applications, or trading facilities (collectively designated as the 'Platforms'), who reside within South Africa or are serviced by the Company subject to this framework (designated as 'Clients' or 'you').

The Company is dedicated to safeguarding the privacy of all personal data processed in strict compliance with International Principles of Information Protection, the Constitution of South Africa 1996, the Protection of Personal Information Act 4 of 2013 ('POPIA'), and the Promotion of Access to Information Act 2 of 2000 ('PAIA'). By accessing the Company's digital platforms, you accept these terms and explicitly consent to the collection, processing, and disclosure of your personal data as outlined herein.

LAW AUTHORISING OR REQUIRING THE COLLECTION OF PERSONAL INFORMATION:

As an authorized Financial Services Provider and licensed ODP, we are statutory obligated to collect and process your personal information in alignment with the following legislative enactments governing financial service delivery:

- Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS)
- Financial Intelligence Centre Act 38 of 2001 (FICA)
- Financial Markets Act 19 of 2012
- Protection of Personal Information Act 4 of 2013 (POPIA)
- Promotion of Access to Information Act 2 of 2000 (PAIA)

COLLECTION OF PERSONAL INFORMATION:

What Personal Information Do We Collect?

Depending upon the specific services provided, the Personal Information we may collect includes:

a) Information submitted during registration or account onboarding application forms, comprising full legal name, date and place of birth, residential address, verified government ID/passport copies, recent proof of residence utility bills, country of residence, geolocation data, banking and credit card payment details, source of wealth/funds, financial transaction history, assets held on deposit with Riyadex, occupation, and financial knowledge/trading experience assessments mandated under applicable statutory KYC, AML, and appropriateness regulations. This data may be cross-verified against public databases or third-party reference services.

- b) Communication contact records, such as email addresses and telephone numbers submitted on landing pages or web forms prior to full registration completion.
- c) Support interaction data collected when you contact our client support teams for technical assistance.

Additional information we may collect:

Riyadex may additionally collect:

- Contact details and message contents submitted via web forms, surveys, or promotional events;
- Digital traffic metrics, device IP addresses, browser types, and communication logs captured during platform usage;
- Technical device metadata including unique device identifiers;
- Web browsing metrics, page interaction history, and clickstreams (detailed in our Cookie Policy);
- Audio recordings of telephone interactions, Skype communications, or live chat support sessions;
- Marketing campaign engagement metrics (email open and click rates);
- Social media profile information made publicly available when interacting with our official social media channels;
- Third-party verification data required to fulfill ongoing statutory identity verification and AML background checks.

HOW WE USE YOUR PERSONAL INFORMATION?

Riyadex processes personal information for the following specific purposes:

I. Compliance with legal obligations:

To comply with statutory legal mandates, including AML and FICA requirements, identity verification, source of funds validation, client appropriateness evaluation, regulatory reporting, and risk management assessments. To verify identity and prevent financial crime, data may be shared with credit reference agencies, identity verification service providers, and financial institutions.

II. For the performance of the contract:

- a) To deliver requested financial execution services, process market transactions, maintain account profiles, deliver operational communications, and tailor platform features aligned with your background and market experience under our legitimate business interest to provide personalized client solutions.
- b) To enforce our legal terms and conditions, monitor potential trading abuse or contract violations, and manage legal disputes or court proceedings.

III. Marketing:

To transmit promotional materials and event updates across communication channels (email, phone, SMS, direct mail, digital channels) during your client relationship and for a reasonable period thereafter, until consent is withdrawn. Direct marketing is conducted based on legitimate interest. Clients may opt-out of marketing communications at any time by emailing customerservice@riyadex.co.za.

IV. Based on Riyadex legitimate interests:

To enhance platform security, optimize trading technology, conduct client feedback surveys, evaluate advertising effectiveness, develop tailored market content, enable interactive terminal functions, and construct aggregated statistical research metrics.

AUTOMATED DECISION - MAKING AND PROFILING

Riyadex utilizes automated analytical decision-making systems to execute customer due diligence, satisfy statutory AML/KYC requirements, evaluate service appropriateness, and fulfill regulatory compliance duties. Data subjects maintain the right to request human intervention, receive an explanation of automated assessment outcomes, and challenge decisions by contacting us. Automated profiling is also utilized for tailored marketing alignment.

HOW LONG DO WE RETAIN THE PERSONAL INFORMATION?

Personal data is retained during active client relationships and thereafter for the minimum duration required to satisfy statutory retention obligations under Section 18 of the FAIS Act and applicable South African laws. Information may be retained longer where legitimate business interests or technical data storage constraints apply, subject to strict privacy safeguards.

WITH WHO DO WE SHARE YOUR PERSONAL INFORMATION?

Data access is restricted strictly to authorized employees, partners, contractors, Product Suppliers, professional advisers, credit agencies, and service providers bound by strict confidentiality standards. Data may also be shared during corporate restructurings, asset sales, or mergers, provided transferee entities guarantee equivalent data protection controls. Information will be disclosed to statutory enforcement agencies, data protection authorities, or judicial bodies when required by law.

TRANSFERS OUTSIDE OF THE SOUTH AFRICA REGION:

Personal information may be transferred across international borders to corporate affiliates, Product Suppliers, or technical sub-processors. Where cross-border data transfers occur, Riyadex ensures lawful transfer mechanisms and robust security controls, utilizing standard contractual clauses compliant with POPIA or European General Data Protection Regulation (GDPR) standards.

LINKS TO OTHER WEBSITES

Our websites may contain links to external third-party platforms. Riyadex exercises no operational control over external websites and disclaims responsibility for third-party privacy practices. Clients should review external privacy notices independently. Riyadex assumes no liability for unauthorized data compromises resulting from client credential negligence or password misplacement.

YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION:

Under POPIA and PAIA, data subjects maintain the following legal rights:

- (i) Access to Personal Information: Right to request details and copies of personal data held by emailing dpo@riyadex.co.za. Public statutory documents remain accessible online without formal requests.
- (ii) Correction of Personal Information: Right to request rectification of inaccurate or outdated personal records.
- (iii) Right to withdraw consent: Right to revoke consent for direct marketing processing at any time.
- (iv) Right of erasure: Right to request deletion of personal records where statutory retention mandates no longer apply.
- (v) Right to object on reasonable grounds: Right to object to processing based on specific personal circumstances, subject to legal overrides.
- (vi) Right to object to direct marketing: Unconditional right to halt marketing processing.
- (vii) Rights regarding automated decision-making: Right to request human evaluation of automated profiling outcomes.
- (viii) Right to Complain: Right to lodge formal complaints with the Riyadex Information Officer via complaints@riyadex.co.za or escalate unresolved disputes to the South African Information Regulator (enquiries@inforegulator.org.za).

USE OF 'COOKIES'

Riyadex digital platforms utilize session and persistent cookies to distinguish individual users, optimize navigation, remember terminal preferences, and enhance web functionality. Cookies gather anonymous telemetry data to improve services without collecting unencrypted personal identifiers.

PROTECTING YOUR DATA

We deploy robust technical and organizational security controls—including transport layer encryption, multi-factor authentication, network architecture segmentation, and strict 'least-privilege' access policies—to safeguard personal data against unauthorized access, loss, or destruction.

AMENDMENTS

Riyadex reserves authority to modify this Notice periodically. Material updates will be communicated via web notifications or direct messaging. Clients remain responsible for reviewing privacy terms regularly.

KEY CONTACT DETAILS

National Head Office:

Postal Address: 1 Edgemere Road, Elfindale, Cape Town, Western Cape, 7945, South Africa

Physical Address: 1 Edgemere Road, Elfindale, Cape Town, Western Cape, 7945, South Africa

Email: Compliance@riyadex.com

Website: www.riyadex.com

Compliance Officer: ..

Riyadex Financials (Pty) Ltd | Reg No. K2021775225

Authorized Financial Services Provider (FSP No. 52504) & Licensed ODP Regulated by the FSCA.