



STONE WALL
C A P I T A L

PRIVACY POLICY

Version 1.0



www.stonewall.capital



+27105003625



support@stonewallcapital.co.za

FINDEXA ADVISORY (PTY) LTD, an authorized Financial Services Provider, licensed and regulated by the Financial Sector Conduct Authority (FSCA) in South Africa with FSP No. 52500 and reg. No. 2022/504112/07, registered at 34 Shortens Country Estate Lee, Ballito, Kwa-Zulu Natal, 4420 South Africa, and its subsidiary FINDEXA ADVISOR EU LTD registered at Filsofou Lapithi, 40, 3117, Limassol, Cyprus.

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1. INTRODUCTION

FINDEXA ADVISORY (PTY) LTD (hereinafter referred to also as the “Company”, “we”, “us”, “our”, “StoneWallCapital”) is an authorized Financial Services Provider, licensed and regulated by the Financial Sector Conduct Authority (FSCA) in South Africa, with FSP No. 52500 and reg. No. 2022/504112/07, registered at 34 Shortens Country Estate, Ballito, Kwa-Zulu Natal 4420. The Company solely owns and operates the website stonewallcapital.co.za (hereinafter referred to also as the “Website”, “Platform”). The Client (hereinafter referred to also as “you”, “you”) acknowledges, confirms and approves that she/he has read, understood, accepted and agreed with all the information available on the Company’s Website, including, but not limited to Legal Documentation, such as Terms of Use, Risk Disclosure Notice, AML & KYC Policy and Privacy Policy (hereinafter referred to as “Legal Documentation”).

The English version of this Privacy Policy is the governing version and shall prevail whenever there is any discrepancy between the English version and other versions.

2. SCOPE

- 2.1 This Privacy Policy (the “Policy”) sets out the process and the procedure adopted by the Company when dealing with Client’s personal and sensitive information. The Policy describes how the Company collects and uses information through its Website. This Policy does not apply to websites operated by other organizations and other third parties.
- 2.2 The Company considers the privacy and integrity of the personal information of its Clients as one of its highest priorities and devotes the maximum amount of attention to keep the said information safely stored as well as used appropriately.
- 2.3 The Company respects the privacy of any user that accesses its Website. The Company is committed in taking all reasonable steps in safeguarding any existing or prospective Clients, applicants and visitors.
- 2.4 All informational material collected on this website is held by the Company in the strictest confidentiality.
- 2.5 The Company incorporates strict rules and specific procedures into its day-to-day running in order to guarantee all Clients the maximum achievable level of security in handling their said information. Client’s personal data is kept by the Company according to the Processing of Personal Data (Protection of the Individual) Law of 2001, its amendment (Law No. 37(I)/2003) and the Processing of Person Data (Protection of Individual) (Amending) Law of 2012 (Law No.105(I)/2012) and the Regulation of Electronic Communications.

3. APPLICATION

- 3.1 In order to open an account with the Company, the Client must first complete Online Account Opening Process, which requires him/her to provide sufficient information. While completing the Online Account Opening Process the Client is requested to disclose private information in order to enable the Company to evaluate his/her application and comply with relevant rules and regulations. This information may also be used by the Company to inform the Client regarding Company’s services. Moreover, information about the Client may also be collected by any correspondence made with the Company by phone, e-mail or otherwise; including information which the Client enters when he/she registers to use the Company’s Website, subscribes to the Company’s service or any other activities carried out on the Company’s

Website or any connected applications.

4. COLLECTION OF DATA

- 4.1 The Company may collect, use, store and transfer different kinds of the personal data from Clients and potential Clients including but not limited the following information:
- 4.1.1 Identity Data: name, surname, proof of identity, date and place of birth, country of residence and citizenship;
 - 4.1.2 Contact Data: residence address, email address, phone number(s), proof of address;
 - 4.1.3 Funding Details: details about payments executed to and from the Company, deposit methods, purpose of transactions with the Company;
 - 4.1.4 Financial Situation: annual income, net worth, source of funds, anticipated account turnover, bank account, bank statements, payment card details and copy thereof, e-wallet information;
 - 4.1.5 Professional Activity: level of education, profession, employment details, financial awareness and trading experience;
 - 4.1.6 Technical Data: internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform.

5. USAGE OF PERSONAL INFORMATION

5.1 Anonymous Statistical Data

- 5.1.1 The Company may collect anonymous statistical information in order to ensure that it meets the needs of its Clients. By collecting such data, the Company is able to monitor and improve the services which it offers to its existing and potential Clients. The Company may share such information with third parties.

5.2 Identifiable Information

- 5.2.1 The information received from Clients is used by the Company in order to, inter alia, confirm the Clients identity at any given time. This is done in order to minimize the risk of any sort unauthorized and unprecedented access to the Clients' account within the System of the Company. The other use of Client's Information includes:
- 5.2.1.1.1 to provide the Client with services that he/she has requested including processing transactions;
 - 5.2.1.1.2 to assess Client's suitability to the products and services we provide;
 - 5.2.1.1.3 to maintain Client's personal profile; to manage Client's account; to contact the Client when necessary or appropriate in relation to the services being provided to him/her, including via a third-party mailing platform;
 - 5.2.1.1.4 to keep the Client updated in relation to matters such as contracts he/she traded and activities of the Company;
 - 5.2.1.1.5 to manage and administer the products and services provided to the Client;
 - 5.2.1.1.6 for marketing purposes, including, but not limited to providing the Client with information regarding the products and services offered by the Company and its partners;
 - 5.2.1.1.7 to develop an understanding of the products and services that the Client may be interested in obtaining from the Company and to tailor the Website to Client's needs and interests;
 - 5.2.1.1.8 to create impersonalized statistical data;

- 5.2.1.1.9 to conduct surveys and questionnaires;
- 5.2.1.1.10 to enforce the governing Terms and Conditions of Use;
- 5.2.1.1.11 if the Company believes that the Client has breached the governing Terms and Conditions of Use, or abused his/her rights to use the services, or performed any act or omission that the Company believes to be violating any applicable law, rules, or regulations, then the Company may share Client's information with law enforcement agencies and other competent authorities as well as with other third parties, as may be required;
- 5.2.1.1.12 if the Company is required, or believes that it is required by law to share or disclose Client's information to financial authorities or to any other third party;
- 5.2.1.1.13 in any case of dispute, or legal proceeding of any kind between the Client and the Company, or between the Client and other clients or third parties with respect to, or in relation with the services that the Company provides;
- 5.2.1.1.14 in any case where the Company believes that sharing information is necessary to prevent imminent physical harm or damage to property.
- 5.2.1.1.15 The Company may use Client's personal information and share it with its partners, contractors, service providers, advisors, transaction processors and affiliates for the above purposes only, or subject to Client's explicit consent.

6. THIRD PARTIES

6.1 The Clients' personal information may be, in limited amounts, distributed and further used by trusted third parties, in particular, banks, through which trading operations and the related transactions will take place. When the Client uses the Company's Website, he/she may be able to link to other websites. This Policy does not apply to those other sites which the Company links to and the Company is not responsible for any personal information collected by third parties via those other sites.

7. DATA SHARING

7.1 The Company may use Personal Data and/or share it with third parties, where deemed applicable, for:

- 7.1.1 billing purposes;
- 7.1.2 product enablement and build;
- 7.1.3 testing or product improvement purposes; and
- 7.1.4 to reply to requests from public authorities.

7.2 When the Company receives Acquiring Services, the Company shall disclose Personal Data to:

- 7.2.1 Visa, its employees, and its third-party subcontractors and their employees;
- 7.2.2 MasterCard, its employees, and its third-party subcontractors and their employees; and
- 7.2.3 Any other payment solution provider or other card scheme used by the Client.

7.3 The Client entitles us to provide the Client's Personal Data to the Card Schemes or other payment solution provider.

7.4 The Company may disclose Personal Data and the trading history of the Client to entities to which it may be reasonably necessary such data to be disclosed, namely:

- 7.4.1 credit reference agencies;
- 7.4.2 law enforcement agencies;
- 7.4.3 antiterrorism or organized crime agencies;
- 7.4.4 fraud monitoring agencies;

- 7.4.5 payment solution providers and card schemes in order to defend the Company on chargeback claims;
- 7.4.6 central banks.
- 7.5 When the Company carries out identity verification checks, Personal Data may be disclosed to providers of due diligence software as a service, credit reference agencies, fraud prevention agencies. These checks are identity checks only and therefore shall have no adverse effect on the respective data subject. However, these service providers/agencies may keep a record of the information and a footprint may be left that an identity verifications check was carried out.

8. SECURITY

- 8.1 The Company makes efforts to maintain the appropriate safeguards in order to ensure that the security, integrity and privacy of the data and personal information provided by the Client is not misused. Such measures and safeguards include encryption during data transmission, strong authentication mechanisms and the separation of machines and data to provide secure areas. While such systems and procedures reduce the risk of security breaches, they do not provide absolute security. Therefore, the Company cannot guarantee that its service will be immune from any wrongdoings, malfunctions, unlawful interceptions or unauthorized access to the information stored therein and to other information security risks, or that Client's private communications on or through Company's service will remain private.

9. UPDATING CLIENT'S DATA

- 9.1 The Client shall inform the Company regarding any changes of his/her personal data. Additionally, the Client shall inform the Company if he/she wishes to delete personal information that the Company holds about him/her. All requests regarding personal data shall be sent by the Client via email at support@stonewallcapital.co.za. We will change or delete Client's personal information in accordance with his/her instructions, except to the extent where the Company is required to hold Client's personal information for regulatory or legal purposes, to provide him/her with the services that he/she has requested or to maintain adequate business records. In any case, the Company may keep any aggregated or anonymized information for the purposes described in this Privacy Policy, indefinitely.

10. CHOICE AND OPT-OUT

- 10.1 By visiting the Company's Website, the Client is not obligated to provide the Company with any of the personal data. However, without providing the information requested during the Online Registration Process, the Company may not be able to open an account for the Client, or to provide the Client with any other services, information or assistance or to evaluate the appropriateness of the service the Client is requesting.
- 10.2 During the Online Registration Process with the Company, as a Client, you will be given the option to opt-out of subscribing to the following additional services:
 - 10.2.1 Marketing services, which provides you with information regarding the products and service s offered by the Company or its partners;
 - 10.2.2 Newsletters;
 - 10.2.3 SMS (text) messages (if applicable);
 - 10.2.4 Other electronic communications.
- 10.3 If the Client wishes not to receive the above-mentioned communications but he/she has

requested to receive such information during the Online Registration Process, the Client may opt-out of receiving them by following the instructions included in each communication.

11. AMENDMENTS TO POLICY

11.1 The Company may change and update the terms of this Privacy Policy from time to time. All amended terms shall be effective 5 calendar days after their initial posting on the Company's Website, or as of the first time that the Client access and or uses Online Trading Facility after such amendments were made, whichever is sooner, unless the Company amends the Privacy Policy to comply with legal or regulatory requirements. In the latter cases, the amendments will become effective as required, or ordered.