

Privacy Policy

INTRODUCTION

At Sandton Capital Markets the privacy and safeguarding of personal & financial information of our clients and the website visitors is one of our highest priorities. By opening an account or by using our website, the prospective client consent to the collection and use of client's personal information by Sandton Capital Markets as is elaborated in the following privacy statement.

CLIENTS PERSONAL INFORMATION AND DATA

Sandton Capital Markets collects information required to open an account, to transact business effectively and to safeguard our clients' assets and privacy. To do this, we gather information to help us assess your needs and preferences. The information we collect directly from you includes information required to communicate with you:

- I. Client's full name
- II. Current mailing address
- III. Current telephone number
- IV. E-mail address
- V. Two forms of identification documents which is required by regulatory authorities.
 1. One copy of a valid government issued picture ID (Government issued identification papers, passport, and or driving license).
 2. Proof of current residence (No older than 3 months).

We also collect demographic information when a client opens an account, including, date of birth, occupation, and information about client's experience and transactions in the capital markets. Sandton Capital Markets may also in assessing client's suitability inquire the level of trading experience, and approximate annual income and net worth.

USE OF PERSONAL INFORMATION

We use personal information only as appropriate to provide Sandton Capital Markets clients high quality service and security. For example, we use the information provided by clients to verify their identity and contact information. We may also use this information to establish and set up client's accounts; issue an account number and a secure password. Maintain client's account activity and contact them with account information. This information helps us to improve our services, to better client's experience and inform them about additional products, services or promotions that may be of an interest to the client.

OUR AFFILIATES AND PARTNERS

We may share information with affiliates if the information is required to provide the product or service the client has requested. Sandton Capital Markets may also forge partnerships and alliances, which may include joint marketing agreements, with other, with other companies or individuals who offer high-quality products and services that might be of value to our clients. To ensure that these products and services meet our clients' needs and are delivered in a manner that is lawful and relevant, we may share some information with partners, affiliates and alliances. This would allow them to better

understand the offers that are most relevant and useful. The use of client's personal information is limited to the purposes identified in our relationship with the partner or an affiliate.

NON-AFFILIATED THIRD PARTIES

Sandton Capital Markets will not use, distribute, sell, license or otherwise disclose any of our client's personal information to any third party for any reason, except if the data is requested by a governmental, regulatory and or any other official law enforcement agencies in South Africa.

SECURITY

All information a client provide to us is stored on secure servers. Any payment transactions will be encrypted using the latest SSL technology. Where we have provided the client or where the client has chosen a password which enables the client to access certain parts of Sandton Capital Markets website or clients' trading or investment accounts. The client bears all responsibility for keeping his or her password confidential (Not to share or disclose personal account password to any other person including to Sandton Capital Markets employees). Sandton Capital Markets and its staff ask our clients not to share their password with anyone, including the staff or employees from the company. The client's password or passwords are highly confidential and are his or hers alone and must not be shared with any other party under no circumstances. Unfortunately, the transmission of information via the internet is not completely secure. Although we at Sandton Capital Markets will do our utmost to protect our client's personal data, we cannot guarantee the security of clients' data transmitted to our website; any transmission is at client's own risk. Once client's information is received by Sandton Capital Markets, there are strict procedures and security features to try to prevent unauthorized access.

RESTRICTION OF RESPONSIBILITY

If at any time the client chooses to purchase a product or service offered by another company, any personal information a client shares with that company will be no longer be controlled under Sandton Capital Markets privacy clauses and statement. Sandton Capital Markets cannot be held responsible for the private policies or content of sites we link to and from have no control of the use or protection of information provided by the client or collected by those sites. Whenever a client elects to link a co-branded website or to a linked website, they may be asked to provide registration or other relevant information. Please note the information that the client is providing is to a third-party and not Sandton Capital Markets the client should follow precautions and pursue a full inquiry with privacy policy provided by that third party.

CLIENTS DATA PROTECTION

Sandton Capital markets may use client data to provide them occasionally with information about our new products and or improved services which may be of interest to our clients and our staff may contact the clients about these services and products offerings by email, telephone, SMS, or by Post. If a client does not (Opt-out) want Sandton Capital Markets to use client's data in this manner, please notify the company

at info@sandtoncm.com. Clients may change their preferences by contacting Sandton Capital Markets client services representatives. An opt-out election by the client made by one account owner of a joint a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account the client holds with Sandton Capital Markets.

WEBSITE USAGE AND COOKIES

The website may use “cookies” to assist us in securing client’s activities and to enhance the performance of our website. Cookies sent by the company do not contain any personal information nor do they contain account or password information. They merely allow the site to recognize that page request comes from someone who has already logged on (Cookies are small text files sent from the web server to clients’ computer). Sandton Capital Markets may share website usage information about visitors to the website with reputable advertising companies for targeting our internet banner advertisements on this site or other sites.

CLIENTS’ RIGHTS

Clients’ do have the right to request a copy of the information held by Sandton Capital Markets (Certain fees and charges may apply). All clients’ also have the right to access their data; have it corrected of any inaccuracies that may have appeared in the company’s database regarding the specific client.

CHANGES TO PRIVACY STATEMENT

From time to time, Sandton Capital Markets may update this privacy statement. In the event of changes to this privacy statement, the revised version will promptly be posted on the website electronically and we will post a notice on company’s website informing clients of such changes. Clients agree to accept posting of a revised privacy statement electronically on the website as an actual notice to them. For further inquiry or any questions that this statement does not address, please contact Sandton Capital Markets client services representative.

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