

FSA License no. SD106

Regulated by the Financial Service Authority

PRIVACY POLICY

Version 2.0

1. Introduction

Topline Limited is a Seychelles investment company incorporated and registered under the legislations of the Seychelles, with registration number 8430685-1. The Company is authorized and regulated by the Financial Service Authority (“FSA”) with Licence number SD106 to provide the reception and transmission of orders in relation to one or more financial instrument and execution of orders on behalf of clients. Any reference to ‘us’, ‘our’, ‘we’ or ‘Company’ in this privacy policy is a reference to each group company within the Topline as the context requires unless otherwise stated. Similarly, any reference to ‘you’, ‘your’, ‘yours’ or ‘yourself’ in this privacy notice is a reference to any of our customers and potential customers as the context requires unless otherwise stated.

2. Scope of the Privacy Policy

This privacy policy tells you how we use personal information collected at this site in accordance with the Protection of Private Information Act. Please read this privacy policy before using the site or submitting any personal information. By using the site, you are accepting the practices described in this privacy policy. These practices may be changed, but any changes will be posted and changes will only apply to activities and information on a going forward, not retroactive basis. You are encouraged to review the privacy policy whenever you visit the site to make sure that you understand how any personal information you provide will be used.

Note: the privacy practices set forth in this privacy policy are for this web site only. If you link to other web sites, please review the privacy policies posted in those sites.

3. Our commitment to you

As part of our day-to-day business, we need to collect personal information from our customers and potential customers to ensure that we can meet their need for a range of financial services and provide them with information about our services. Your privacy is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. This policy outlines how we manage your personal information supplied to us by you or a third party in connection with our provision of services to you or which we collect from your use of our services and/or our app(s) or website(s). It also details your rights in respect of our processing of your personal information.

Our privacy policy will be reviewed from time to time to take account of new obligations and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any personal information we hold will be governed by our most current privacy policy.

4. Data Processing (DP)

4.a DP Officer Contact Information

Should you have any questions about this privacy policy, including any requests to exercise your legal rights, please send us an email at: dpo@topline.limited

4.b Data Collection

We collect personal, identifiable information such as names (proof of identity), postal addresses proof of residence, email addresses, proof of payment etc. when you complete our Appropriateness test, Client Agreement or when you register as a site user for verification purposes and as required by the Financial Intelligence Centre Act 38 of 2001 (FICA).. Please note that when you access our website, we collect non-identifiable information in the following ways:

- Contact Data – we collect, which may include, but are not limited to, your first name, last name, nationality, date of birth, telephone number (landline and mobile), fax number, email address and postal address
- Personal and Professional Information - we collect, which may include, but are not limited to, your marital status, education, occupation, information regarding your financial situation such as source of wealth and gross annual income, tax identification number.
- Cookies (including third party Cookies) – Please refer to section 11 “Cookies”
- Transactional data, including products and services ordered, financial details and payment methods;
- Data from surveys and publicly available information, such as social media posts and professional profiles available in the public domain, e.g. LinkedIn, Twitter or Facebook;
- Information about a device you use, such as browser, device type, operating system, the presence or use of “apps”, screen resolution, and the preferred language;

- Consent records: records of any consents you may have given, together with the date and time, means of consent and any related information;
- Employer details: where you interact with us in your capacity as an employee of an organisation, the name, address, telephone number and email address of your employer, to the extent relevant; and
- Payment details: billing address; payment method; bank account number or credit card number; invoice records; payment records; SWIFT details; IBAN details; payment amount; payment date; and records of cheques;
- Data relating to your visits to our website: your device type; operating system; browser type; browser settings; IP address; language settings; dates and times of

connecting to a website; and other technical communications information (if applicable).

The Company has the right to request additional documents and information to carry out its due diligence where it deems fit. We only collect personal data that is adequate and relevant for the purposes of our business and for a reasonable period of at least five years as required by the Financial Advisory & Intermediary Services Act (FAIS Act) .

4.c Purpose of Data Processing& Legal Basis for Processing

The processing of your Data shall be solely for Know Your Customer (KYC) purposes as required by the Financial Intelligence Center Act (FICA). If you have given us your specific consent for processing (other than for the reasons set out above) then the lawfulness of such processing is based on that consent as defined in the Protection of Personal Information Act (POPIA). You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected.

Toplineshall collect your personal information to use for KYC and anti-money laundering purposes. By knowing the country of origin, source of income, if the client is a Politically Exposed Person and monitoring the amount of and pattern of deposits Toplineshall be able to make conclusions regarding money activities that are carried out by our clients.

A client shall be flagged as a high-risk client based on the personal information that he/she Submits. If a client is domiciled in a high rsk country, he/she will not be allowed to trade on our platform.

We will only process your Personal Information in the ordinary course of providing our online intermediary services. We will primarily use your Personal Information only for the purpose for

which it was originally or primarily collected. We will use your Personal Information for a secondary purpose only if such purpose constitutes a legitimate interest and is closely related to the original or primary purpose for which the Personal Information was collected. We may subject your Personal Information to Processing during the course of various activities, including, without limitation, the following -

4.c.1 operating our business;

4.c.2 to analyse, develop, improve and optimize the use, function and performance of our products and services;

4.c.3 compliance with applicable law; and

4.c.4 to manage the security of our sites, networks and systems;

4.c.5 for the purpose of making contact with you and attending to your enquiries or requests;

4.c.6 for the purpose of carrying out actions for the conclusion and performance of a contract between the Company and yourself / the Data Subject;

4.c.7 for the purpose of pursuing your and/or the Company's legitimate interests, or that of a third party to whom the Personal Information is supplied;

4.c.8 for the purpose of providing, maintaining and improving the Company's products and services, and to monitor and analyse various usage and activity trends pertaining thereto;

4.c.9 for the purpose of performing internal operations, including management of employees, the performance of all required functions of the Company, attending to financial matters including budgeting, planning, invoicing, facilitating and making payments sending receipts and generally providing commercial support, where needed, requested or required;

4.c.10 for the purpose of preventing fraud and abuse of the Company's processes, systems, procedures and operations, including conducting internal and external investigations and disciplinary enquires and hearings;

4.c.11 for safety and security purposes; and

4.c.12 to comply with applicable laws.

You agree that the Company may use all the Personal Information which you provide to the Company, which the Company requires for the purposes of pursuing its business objectives and strategies

Types of Processing

Collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Request for Correction or Deletion of Personal Information

All requests for correction or deletion of personal data shall be sent to the Information Officer in the form of a filled out form provided as Annexure A below.

5. Disclosure of your personal data.

5.1 We may disclose your Personal Information to our clients and business partners, for legitimate business purposes, in accordance with applicable law and subject to applicable professional and regulatory requirements regarding confidentiality. In addition, we may disclose your Personal Information -

5.1.1 if required by law;

5.1.2 to third party Operators (including, but not limited to, data processors such as providers of data hosting services and document review technology and services), located anywhere in the world, subject to 5.2;

5.1.4 to provide information to third party service providers who process information on our behalf to help run some of our internal business operations including email distribution, IT services and customer services;

5.1.5 to any relevant party for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including, but not limited to, safeguarding against, and the prevention of threats to, public security; and

5.1.6 to any relevant third-party provider, where our website uses third party advertising, plugins or content.

5.2 If we engage a third-party Operator to process any of your Personal Information, we recognise that any Operator who is in a foreign country must be subject to a law, binding corporate rules or binding agreements which provide an adequate level of protection similar to POPIA. We will review our relationships with Operators we engage and, to the extent required by any applicable law in force, we will require such Operators to be bound by contractual obligations to -

5.2.1 only process such Personal Information in accordance with our prior written instructions; and

6. 5.2.2 use appropriate measures to protect the confidentiality and security of such Personal Information.

Safeguard Measures

We implement appropriate technical and organisational security measures to protect your Personal Information that is in our possession against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, in accordance with applicable law.

Where there are reasonable grounds to believe that your Personal Information that is in our possession has been accessed or acquired by any unauthorised person, we will notify the relevant regulator and you, unless a public body responsible for detection, prevention or investigation of offences or the relevant regulator informs us that notifying you will impede a criminal investigation.

7. Duration of keeping Your Information

You may request from us to erase/delete your personal data in cases where there is no rationale as to the need for us to continue to process it. However, we may not be able to comply with your request due to regulatory requirements by which you will be notified accordingly.

8. We will not keep Your Information for any longer than is required for legal and/or business purposes. In many cases, information must be kept for considerable periods of time, subject to a maximum of **five (5) years**. Retention periods will be determined considering the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

Cookies
A cookie is a small piece of text stored on your computer or device when you visit a website or an app. We use cookies on our websites or our apps to provide you with a more relevant and effective experience, including presenting web pages according to your needs or preferences. For further information about cookies and how we use cookies, please refer to our website.

9. Geographical processing of Personal data

In order to provide services to you, you acknowledge that it may be necessary for your information to be transferred to someone who provides a service to us in other countries, including some outside of Seychelles, and you consent to such transfer.

Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of Seychelles if the: (1) recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or (2) Data Subject consents to the transfer of their Personal Information; or

To the extend we transfer your information outside Seychelles, we will ensure that the transfer is lawful and that the Processors in third party countries are obligated to comply with the South African law - Protection of Personal Information Act.

10. Update of this Policy

This Policy is subject to change without notice. For this reason, you are advised to look for updates from time to time.

Annexure A:

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR
DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN
TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION
ACT, 2013**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL
INFORMATION, 2018**

[Regulation 3]

Note:

- 1. Affidavits or other documentary evidence as applicable in support of the request may be attached.**
 - 2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.**
 - 3. Complete as is applicable.**
- Mark the appropriate box with an "x".**

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of Datas ubject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of datasubject:	

Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
c	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT (Please provide detailed reasons)