



# PRIVACY POLICY

**Effective Date: November 2025**

**Version: 1.0**

## **VG MARKETS (PTY) LTD PRIVACY POLICY**

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### **1. Introduction**

VG MARKETS (PTY) LTD (“we”, “us” or “VG Markets”), is a company registered in the Republic of South Africa under registration number **2024/244398/07**, and is authorized and regulated by the Financial Sector Conduct Authority (FSCA) under FSP license number **54461**. Our full commercial address is:

**Norwich Place West, 2nd Floor, Cnr 5th and Norwich, Sandown, Sandton, Johannesburg, 2196.**

VG Markets facilitates direct access to global financial markets for retail clients through an extensive network of top-tier liquidity providers. Our technological infrastructure is engineered to seamlessly transmit client orders to these liquidity sources, ensuring a trading environment underpinned by transparency, fairness, and unwavering operational integrity.

As part of our regulatory obligations and service delivery framework, we collect and process personal information. This Privacy Policy outlines how we manage your personal data in compliance with the Protection of Personal Information Act, 2013 (POPIA), as amended, and other applicable data protection laws.

### **2. Our Commitment to Your Privacy**

VG Markets is committed to protecting the privacy and security of all personal information we obtain from you — whether during your visits to our website, use of our trading platforms, or through the provision of intermediary financial services.

VG Markets will only collect, use, store, disclose, and retain your personal information in accordance with this Privacy Policy and POPIA. We believe that safeguarding your data is fundamental to maintaining trust and delivering high-quality, secure trading experiences.

### **3. Why We Collect Personal Information**

VG Markets collects personal information primarily to:

- Fulfill our legal and regulatory obligations under FSCA and anti-money

laundrying (AML) frameworks;

- Establish, verify, and manage your trading account;
- Provide STP execution services via integration with multiple global liquidity providers;
- Maintain accurate client records;
- Prevent fraud, money laundrying, and other financial crimes;
- Improve our systems, platform performance, and customer support;
- Communicate important updates regarding your account or our services.

All data collection supports our role as an STP-focused financial intermediary serving traders worldwide.

#### **4. What Personal Information Do We Collect?**

VG Markets will collect and hold information about you when you complete an application or other types of form or access and trade on your account through the website or other services we provide to you. VG Markets may derive information from your use of this website or another service we provide to you and may store this information with your personal profile. The types of personal information we may collect include:

##### **Identity and Contact Information**

- Full name, date of birth, gender, nationality
- Residential address and contact details (email, phone)
- Government-issued identification numbers (e.g., ID card, passport, tax number)

##### **Financial and Transactional Data**

- Bank account details, payment method information
- Transaction history, deposit/withdrawal records
- Trading activity logs and order execution reports

##### **Verification and Due Diligence Information**

- Proof of identity documents (scanned copies of ID/passport)

- Proof of residence (utility bills, bank statements)
- Source of funds and wealth documentation (where required)

#### **Technical and Usage Data**

- IP address, device type, operating system, browser type
- Login times, session duration, frequency of platform access
- Pages visited on our website, features used on trading platforms
- Cookie identifiers and behavioral analytics (see Section 9)

This information may be collected when you:

- Open an account online
- Submit forms or upload documents
- Use our website, mobile app, or trading platforms
- Contact our support team
- Engage with marketing communications (if opted-in)

VG Markets may also derive usage-based insights from your interactions with our systems, including real-time monitoring of trading behavior for risk management and system optimization purposes.

### **5. How We Use Your Personal Information**

VG Markets may use your personal information for one or more of the following purposes:

- To process your account application and perform mandatory Know Your Customer (KYC) and AML checks.
- To authenticate your identity and prevent unauthorized access.
- To execute trades through our STP model and route orders to liquidity providers.
- To monitor transactions for suspicious activity using automated real-time surveillance tools.
- To communicate with you about your account status, service changes, or technical issues.

- To send service-related notifications, including balance alerts and maintenance schedules.
- To personalize your experience on our platforms based on trading patterns.
- To improve our technological infrastructure, cybersecurity measures, and customer service workflows.
- To provide you with information or opportunities that we believe may be relevant to you.
- To tailor the website or other services we provide to you to your needs and interests; and
- To generate anonymized statistical reports for internal analysis and product development.
- To comply with legal, audit, and regulatory reporting requirements.

By using our services, you consent to the processing of your personal information for these purposes.

You also acknowledge and consent to the transfer of your personal information outside of South Africa where necessary — for example, to international liquidity providers, cloud hosting providers, or third-party service partners — provided that such recipients offer adequate data protection safeguards consistent with POPIA and global standards.

## 6. Who We May Disclose Your Information To

VG Markets may be required to provide your personal information to the regulator and government bodies from time to time. VG Markets may disclose your personal information to the following categories of recipients:

- **Regulatory Authorities:** Including the FSCA, South African Reserve Bank (SARB), and Financial Intelligence Centre (FIC), as required by law.
- **Liquidity Providers:** Global financial institutions and prime brokers who execute your trades under our STP model. These entities act solely as processors and are bound by confidentiality agreements.
- **Third-Party Service Providers:** Such as identity verification platforms (e.g., Shufti, Jumio), payment processors, cloud infrastructure providers (e.g., AWS), IT support, cybersecurity firms, and customer communication tools.

- **Professional Advisors:** External auditors, legal counsel, and compliance consultants engaged in supporting our operations.
- **Affiliated Entities or Group Companies** (if any): Only where necessary and under strict data-sharing protocols.
- **Persons Acting on Your Behalf:** For example, your appointed broker, financial advisor, or legal representative, upon your written instruction.

All disclosures are made strictly for legitimate business, legal, or operational purposes and in line with POPIA's conditions for lawful processing. Please note that VG Markets does not sell or provide your personal information to third parties for marketing purposes.

## 7. Internal Governance and Compliance Oversight

VG Markets maintains robust internal governance structures to ensure compliance with data protection and financial regulations. We have established a **Compliance Committee** responsible for overseeing adherence to KYC, AML, POPIA, and FSCA requirements.

While the committee does not meet on a fixed monthly schedule, it convenes **as needed** — particularly in response to significant regulatory developments, security incidents, or major changes in business operations — ensuring agile and effective oversight.

Our compliance framework includes regular staff training, periodic audits, and documented procedures for handling personal information securely and ethically.

## 8. Updating and Managing Your Information

You have the right to:

- Update your personal details at any time via your client portal or by contacting us.
- Request correction of inaccurate or incomplete information.
- Ask us to delete your personal data, subject to legal and regulatory retention obligations.

To update your information or submit a data subject request, please email us at: [support@vgmarkets.com](mailto:support@vgmarkets.com)

Please note: We are required to retain certain information by law, regulation, or legitimate business necessity — including recordkeeping for transaction histories, dispute resolution, or audit trails.

## 9. Cookies and Online Tracking Technologies

VG Markets uses cookies and similar tracking technologies on our website and platforms to enhance user experience and analyze traffic patterns.

**Cookies** are small text files stored on your device that allow us to recognize your browser, remember preferences, and track how you interact with our digital services.

Types of cookies we use include:

- **Essential cookies:** Required for core functionality (e.g., login sessions)
- **Performance cookies:** Help us understand site usage and improve performance
- **Functional cookies:** Enable personalized settings
- **Analytics cookies:** Used to compile anonymous statistics

Most web browsers allow you to block or disable cookies. However, doing so may limit access to certain features of our platforms or affect trade execution efficiency.

## 10. Security of Your Personal Information

We take information security extremely seriously. As an STP broker handling sensitive financial and personal data, we adopt industry and information security best practices to protect your personal information and ensure it is not accessed by unauthorized people. Measures include encryption of data during transmission, strong authentication mechanisms and secure access to machines and data.

Despite our best efforts, no system can guarantee absolute security. We encourage clients to adopt strong passwords and remain vigilant against phishing attempts.

## 11. Your Rights Under POPIA

Under the Protection of Personal Information Act, you have the following rights

(subject to certain exceptions):

- **Right to Access:** Request a copy of the personal information we hold about you.
- **Right to Rectification:** Correct inaccurate or outdated information.
- **Right to Erasure:** Request deletion of data, unless retention is legally mandated.
- **Right to Object:** Opt out of direct marketing or specific processing activities.
- **Right to Data Portability:** Receive your data in a structured, commonly used format.
- **Right to Lodge a Complaint:** If unresolved, escalate concerns to the Information Regulator of South Africa.

To exercise any of these rights, please contact us using the details below. We will respond within 30 days.

We may charge a reasonable administrative fee to cover costs associated with processing subject access requests.

## 12. Links to Third-Party Websites

When you use this website or other services we provide to you, you may be able to link to other websites. This Privacy Policy does not apply to those sites. VG Markets encourage you to read the privacy policies on such websites.

## 13. Amendments to This Policy

VG Markets reserves the right to modify this Privacy Policy at any time to reflect changes in our practices, technology, legal obligations, or business structure.

Any updates will be posted on our official website: [www.vgmarkets.com](http://www.vgmarkets.com) with a revised "Effective Date".

Your continued use of our services after such changes constitutes acceptance of the updated terms.

We recommend that you periodically review this page to stay informed about how we protect your data.

#### 14. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or the handling of your personal information, please contact us:

**Email:** [support@vgmarkets.com](mailto:support@vgmarkets.com)

**Postal Address:**

VG MARKETS (PTY) LTD  
Norwich Place West, 2nd Floor  
Cnr 5th and Norwich, Sandown  
Sandton, Johannesburg, 2196  
South Africa

For formal data protection inquiries, you may also reach out to our designated Compliance Officer at: [compliance@vgmarkets.com](mailto:compliance@vgmarkets.com)

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This document is effective as of November 2025.