

Privacy Policy

1. Introduction and Purpose

1.1 This Privacy Policy explains how AlgoHive (Pty) Ltd, including its subsidiaries and affiliates where applicable (collectively, “AlgoHive”, “we”, “us”, or “our”), collects, uses, discloses, and safeguards Personal Information in connection with our websites, mobile and web applications, products, services, and events (together, the “Services”).

1.2 AlgoHive is a licensed Financial Services Provider in South Africa and processes Personal Information in accordance with the Protection of Personal Information Act 4 of 2013 (“POPIA”) and, where applicable, the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and other relevant laws.

1.3 By accessing or using the Services, you acknowledge that you have read and understood this Privacy Policy. If you do not agree, you must not use the Services.

2. **Controller and Contact**

2.1 AlgoHive (Pty) Ltd is the responsible party or data controller for purposes of POPIA and, where applicable, GDPR.

2.2 Registered office and principal place of business: 3 Gwen lane, Sandton, Johannesburg, South Africa.

2.3 Data Protection Officer or Information Officer.

2.4 Contact details for privacy queries and the exercise of rights:
legal@algohive.africa or 010 276 0531

2.5 Complaints may be lodged with the Information Regulator (South Africa). Contact information is available on the Information Regulator’s official website. If GDPR applies, complaints may also be lodged with the competent supervisory authority in the relevant Member State.

3. **Scope and Audience**

3.1 This Privacy Policy applies to clients, prospective clients, beneficial owners, directors and controllers, website and app users, independent financial advisers, suppliers, and other counterparties that interact with AlgoHive.

3.2 The Services are intended for persons 18 years or older. If we learn that a child's Personal Information has been collected without appropriate consent, we will take reasonable steps to delete such information or obtain lawful consent.

4. Definitions

4.1 "Personal Information" has the meaning given in POPIA and includes information that identifies or can be used to identify a natural or juristic person.

4.2 "Special Personal Information" includes information relating to children, health, biometric information, and other categories defined by law.

4.3 "Processing" means any operation performed on Personal Information, including collection, recording, storage, alteration, use, disclosure, and deletion.

5. Categories of Personal Information Collected

5.1 Identification and onboarding data, including full name, date of birth, identity or passport number, photographs or video for identity verification, nationality, tax identifiers, residential and business addresses, and contact details.

5.2 KYC, AML, and sanctions screening data, including proof of address, source of funds and source of wealth information, occupation, employer details, beneficial ownership information, politically exposed person status, and results of screening against sanctions and adverse media databases.

5.3 Financial information, including bank account details, account balances, transaction histories, payment records, portfolio holdings, trading activity, valuations, orders, fills, contract notes, statements, collateral and margin data, credit applications and outcomes, and information generated by our wealth tools.

5.4 Technical and usage data, including device identifiers, IP address, app telemetry, cookies and similar technologies, log files, and analytics data concerning interactions with the Services.

5.5 Communications and preferences, including emails, in-app messages, recordings of customer support interactions where permitted by law, marketing preferences, and consent records.

5.6 Professional information for advisers and partners, including FSP licence details, practice information, mandates, and regulatory attestations.

5.7 Special Personal Information is not routinely required except where necessary for identity verification or legal compliance. Where Special Personal Information is processed, we will obtain explicit consent or rely on another lawful ground permitted by law.

6. Sources of Personal Information

6.1 Directly from you through account creation, onboarding, funding, trading, the use of wealth tools, and customer support interactions.

6.2 Automatically from your device through cookies, SDKs, APIs, analytics, and similar technologies.

6.3 From third parties, including credit bureaus, identity verification and KYC service providers, sanctions and PEP screening providers, custodians, brokers, payment processors, fund managers, financial advisers, and publicly available sources and registers.

7. Lawful Bases and Purposes of Processing

7.1 Contract performance, including creating and administering accounts, executing orders, maintaining positions and portfolios, providing statements and reporting, facilitating investment-backed credit, and providing the Services requested.

7.2 Legal obligations, including compliance with FAIS, FICA, AML and CTF laws, tax laws, National Credit Act obligations where applicable, market conduct rules, and recordkeeping requirements.

7.3 Legitimate interests, including securing and improving the Services, fraud prevention, risk and compliance monitoring, safeguarding client assets, product development, service analytics, and asserting or defending legal claims. We balance our interests against your rights and expectations.

7.4 Consent, including where required for marketing communications, certain cookies and analytics, processing of Special Personal Information, or cross-border transfers where no other safeguard is available. You may withdraw consent at any time without affecting the lawfulness of processing prior to withdrawal.

8. Use of Personal Information

8.1 To onboard clients and counterparties, perform identity verification, undertake KYC, AML, CTF, sanctions, and PEP screening, and maintain records and audit trails.

8.2 To provide portfolio and trading functionality, including order routing, execution, allocations, confirmations, statements, and corporate actions servicing.

8.3 To generate and display strategy factsheets, performance and risk analytics, and other disclosures designed to ensure transparency.

8.4 To provide wealth tools, insights, budgeting, and behavioural nudges that support long-term financial outcomes.

8.5 To provide investment-backed credit where applicable, including eligibility checks, collateral valuations, margin monitoring, margin calls, and enforcement in accordance with contracts and law.

8.6 To provide client support, handle queries and complaints, and communicate service changes and legal notices.

8.7 To conduct market research, product development, testing, monitoring, and quality assurance.

8.8 To detect, prevent, and investigate fraud, abuse, market manipulation, cyber incidents, or violations of law or contract.

8.9 To comply with lawful requests from regulators, courts, exchanges, and other authorities.

9. Disclosures and Categories of Recipients

9.1 Regulated financial counterparties, including brokers, exchanges, central securities depositories, custodians, transfer agents, fund administrators, market data providers, payment service providers, and banks.

9.2 Compliance and verification vendors, including identity, KYC, AML and CTF screening, sanctions and PEP screening, adverse media, and address verification providers.

9.3 Professional advisers, including legal counsel, auditors, and consultants, under appropriate confidentiality obligations.

9.4 Independent financial advisers and distribution partners, where you have selected or engaged them, or where permitted by law and contract, to provide services to you.

9.5 Group companies and service providers, including cloud hosting, cybersecurity, IT support, analytics, communications, and customer support platforms, under written agreements requiring appropriate security and confidentiality.

9.6 Regulators, law enforcement, courts, exchanges, dispute resolution bodies, and other authorities where disclosure is required by law or lawful order.

9.7 Business transfers, including in connection with mergers, acquisitions, reorganisations, or the sale of assets, subject to confidentiality and continued protection of Personal Information.

10. Cross-Border Transfers

10.1 Personal Information may be transferred to and processed in countries outside South Africa. We will ensure an adequate level of protection as required by POPIA relevant sections and, where GDPR applies, by using appropriate safeguards such as standard contractual clauses or by relying on adequacy decisions.

10.2 Details of cross-border safeguards may be requested using the contact details in clause 2.

11. Retention

11.1 We retain Personal Information for as long as necessary to fulfil the purposes set out in this Privacy Policy, including satisfying legal, regulatory, tax, accounting, and reporting requirements, resolving disputes, and enforcing agreements.

11.2 Records required by financial sector laws, including FAIS and FICA, are retained for the statutory minimum periods, which are typically five years or longer where investigations, audits, or legal proceedings require extended retention.

11.3 When retention is no longer required, Personal Information will be securely deleted, de-identified, or archived in accordance with our records management policies.

12. Security

12.1 We implement appropriate technical and organisational measures designed to protect Personal Information against unauthorised access, accidental loss, destruction, or damage. Measures include access controls, encryption in transit and at rest where appropriate, network security, vulnerability management, segregation of duties, background checks for relevant personnel, and audit logging.

12.2 We maintain incident response procedures and will notify you and competent authorities of data breaches where required by law.

13. Your Rights

13.1 Under POPIA you may have the right to request access to your Personal Information, request correction, request deletion where lawful, object to certain processing, and lodge a complaint with the Information Regulator.

13.2 Where GDPR applies you may have additional rights including data portability and restriction of processing, as well as the right to object to processing based on legitimate interests and to withdraw consent at any time.

13.3 Requests to exercise rights should be submitted to privacy@algohive.africa. We may require verification of identity and sufficient information to locate the Personal Information.

13.4 Certain information may be retained or processing may continue where required by law, for the establishment, exercise, or defence of legal claims, or for overriding legitimate interests permissible by law.

14. Marketing Communications

14.1 We may send service and transactional communications that are necessary for the provision of the Services.

14.2 We may send direct marketing communications where permitted by law. You may opt out at any time by using the unsubscribe link or by contacting us. Opting out does not affect service or transactional communications.

15. Cookies and Similar Technologies

15.1 We use cookies, SDKs, and similar technologies to enable core functionality, enhance user experience, conduct analytics, and support security.

15.2 You may manage preferences through your browser or device settings. Disabling certain cookies may affect the functionality of the Services.

15.3 Where required by law we will obtain consent for non-essential cookies and provide a mechanism to withdraw consent.

16. Automated Decision-Making and Profiling

16.1 We may use automated processing to support identity verification, fraud detection, risk monitoring, suitability checks, margin and collateral monitoring, and to generate insights within wealth tools.

16.2 We do not make solely automated decisions that have legal or similarly significant effects without providing a mechanism for human intervention where required by law.

17. Investment-backed Credit

17.1 Where you apply for credit secured by investments, we will process Personal Information necessary to assess eligibility, collateral, affordability where applicable, and ongoing margin or collateral adequacy.

17.2 We may exchange information with relevant counterparties and credit bureaus as permitted by law and contract.

17.3 Conservative loan to value limits, eligible collateral lists, and margin monitoring are applied in accordance with contracts and regulatory requirements.

18. Independent Financial Advisers and Partners

18.1 If you engage an adviser or connect your account to an adviser or partner, we will share Personal Information necessary to provide the requested services, including portfolio, holdings, transactions, performance, and reporting data, subject to your instructions and applicable law.

18.2 Advisers and partners act as independent responsible parties or controllers for their own processing activities and are responsible for their own compliance.

19. Third-Party Links and Services

19.1 The Services may contain links to third-party websites or services. AlgoHive is not responsible for the privacy practices of third parties. You should review the privacy policies of third-party sites and services before providing Personal Information.

20. International Users

20.1 If you access the Services from outside South Africa, you consent to the processing and transfer of your Personal Information in and to South Africa and other jurisdictions with privacy protections as described in this Privacy Policy.

21. Changes to this Privacy Policy

21.1 We may amend this Privacy Policy from time to time. Material changes will be notified through the Services or by email where appropriate. The most current version will govern processing and is available within the Services.

21.2 Continued use of the Services after the effective date of changes constitutes acknowledgment of the updated Privacy Policy.

22. Contact and Requests

22.1 Questions, requests to exercise rights, complaints, or requests for copies of safeguards and policies may be submitted to legal@algohive.africa or to AlgoHive (Pty) Ltd at the address in clause 2.

22.2 Effective date of this Privacy Policy: 16/10/25.

22.3 Version: 2