

GABRIENNE TRADING SYSTEMS PROPRIETARY LIMITED
("GTS")
WEBSITE PRIVACY POLICY

Last updated: 20 August 2026

1. Introduction and Scope

1.1 Gabrienne Trading Systems Proprietary Limited (registration number 2019/511288/07) ("GTS", "we", "us" or "our"), of: 1 Wedgewood Link Rd, Bryanston, Johannesburg, 2191, South Africa, respects your privacy and is committed to protecting your Personal Information.

1.2 GTS is the "responsible party" (as defined in POPIA) in respect of the Personal Information described in this Policy. Our contact details, and those of our Information Officer, appear in clause 14 below.

1.3 This Policy explains how GTS collects, uses, stores, shares, protects and disposes of Personal Information when you: (a) visit or use our website at <https://www.gabrienne.com/> (the "Website"); (b) submit an enquiry using the contact form on the Website; (c) schedule a meeting or consultation with us using the "Book with our CEO" scheduling link on the Website; or (d) subscribe to our mailing list, newsletter or other marketing communications.

1.4 This Policy constitutes the notification contemplated in section 18 of POPIA.

1.5 This Policy applies only to Personal Information collected through the Website. It does not apply to Personal Information processed by GTS in the course of licensing or supporting its trade execution and post-trade software (including the GTS Trading UI, the GTS Admin UI and the Market Data API).

1.6 The Website may contain links to third-party websites, applications or services. GTS is not responsible for the privacy practices, content or security of those third parties. We encourage you to review their privacy policies before providing any Personal Information to them.

2. Definitions

In this Policy the following terms bear the meanings assigned to them in POPIA:

2.1 "Data Subject" means the person to whom Personal Information relates, being you;

2.2 "Operator" means a person who processes Personal Information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party;

2.3 "Personal Information" means information relating to an identifiable, living, natural person and, where applicable, an identifiable, existing juristic person, including your name, e-mail address, telephone number, online identifiers, and correspondence sent by you that is implicitly or explicitly of a private or confidential nature;

2.4 "POPIA" means the Protection of Personal Information Act, 4 of 2013, together with the regulations published under it;

2.5 "Processing" means any operation concerning Personal Information, including its collection, receipt, recording, organisation, storage, updating, retrieval, alteration, use, dissemination, merging, linking, restriction, degradation, erasure or destruction;

2.6 "Regulator" means the Information Regulator (South Africa) established in terms of section 39 of POPIA;

2.7 "Responsible Party" means the person which determines the purpose of and means for Processing Personal Information, being GTS; and

2.8 "Special Personal Information" bears the meaning assigned to it in section 26 of POPIA.

3. Information We Collect

3.1 Depending on how you interact with the Website, we may collect the following Personal Information: (a) your name, e-mail address, and company name or institution, as submitted via our contact form; (b) meeting dates, times, and any notes or details provided when scheduling appointments through our calendar booking feature, which is operated on our behalf by Microsoft; (c) your e-mail address, name and communication preferences when you subscribe to our mailing list or newsletter; (d) any additional message or details you choose to share in your enquiries or correspondence with us; and (e) technical information collected automatically when you browse the Website, including your IP address, browser type and version, device type, the pages you view and the date and time of your visit. Please see clause 6 (Cookies) below.

3.2 We collect Personal Information directly from you, save for the technical information described in clause 3.1, which is collected automatically.

3.3 We do not require, and do not knowingly collect, Special Personal Information through the Website. Please do not include information concerning your health, religious or philosophical beliefs, race or ethnic origin, political persuasion, trade union membership, sex life, biometric information or criminal behaviour in any message you send us.

3.4 The supply of your Personal Information to us is voluntary and you are under no obligation to provide it. However, if you do not complete the fields marked as required, we will not be able to respond to your enquiry, schedule a meeting with you, or send you the communications you have asked to receive.

4. How We Use Your Information

4.1 We process your Personal Information only for the following specific, explicitly defined and lawful purposes: (a) responding to your enquiries, questions, or requests; (b) scheduling, managing, and conducting meetings or consultations you book with us; (c) sending periodic e-mails, newsletters, or updates regarding our services where you have opted in to receive them, subject to clause 5 below; (d) communicating with you regarding our services or business relationship; (e) maintaining the security and proper functioning of the Website and protecting against fraud, unauthorised access and other security threats; and (f) complying with our legal, regulatory and contractual obligations.

4.2 We process your Personal Information on one or more of the following grounds of justification recognised in section 11 of POPIA: (a) you have consented to the processing; (b) the processing is necessary to conclude or perform a contract to which you are a party; (c) the processing is necessary to comply with an obligation imposed on us by law; or (d) the processing is necessary to pursue our legitimate interests or those of a third party to whom the information is supplied, provided that your rights are not unduly prejudiced.

4.3 We will not process your Personal Information for any purpose that is incompatible with the purpose for which it was collected, unless you consent to that further processing or it is otherwise permitted under section 15 of POPIA.

4.4 We collect only the Personal Information that is adequate, relevant and not excessive having regard to the purposes set out above.

5. Direct Marketing and Your Mailing List Preferences

5.1 We will only send you direct marketing by electronic communication (including e-mail, SMS or automatic calling machine) if you have given us your prior written consent to do so, or if you are an existing customer of GTS and clauses 5.3 and 5.4 apply.

5.2 Where we do not already hold your consent, we may approach you once, and once only, to request it. We will do so using Form 4 prescribed under the regulations to POPIA. If you do not respond, we will not approach you again and your silence will not be treated as consent.

5.3 If you are an existing customer, we may send you direct marketing relating to our own similar products or services where we obtained your contact details in the context of the sale of a product or service to you.

5.4 In every case, you will be given a reasonable opportunity to object to receiving marketing communications, free of charge and without unnecessary formality, both at the time we collect your details and in each communication we send you.

5.5 Every marketing communication we send will identify GTS as the sender and will contain an address or other contact details to which you may send a request that the communications cease.

5.6 We will not send you direct marketing if you have registered a pre-emptive block against direct marketing in terms of section 11 of the Consumer Protection Act, 68 of 2008, or if you have previously objected to receiving it.

5.7 Our mailing list, once introduced, will be administered on our behalf by a third-party mailing list provider. Unsubscribing through the link in any e-mail we send will remove you from that list. You may also unsubscribe at any time by contacting our Information Officer using the details in clause 14.

6. Cookies

6.1 The Website uses cookies and similar technologies. A cookie is a small text file placed on your device which allows the Website to function correctly and, where applicable, allows us to understand how the Website is being used.

6.2 Cookie identifiers and IP addresses may constitute Personal Information under POPIA where they can be linked to you. We therefore treat them as Personal Information.

6.3 We currently use only those cookies that are strictly necessary for the security and integrity of the Website, as stated in the cookie notice displayed when you first visit. We do not use analytics, advertising or other non-essential cookies. Should that change, we will obtain your consent before doing so. You may set your browser to refuse cookies, although parts of the Website may then not function correctly.

7. Sharing of Information

7.1 We do not sell, trade, or otherwise transfer your Personal Information to third parties for their own marketing purposes. We may, however, share your Personal Information with: (a) operators appointed by us to process Personal Information on our behalf, being the providers of our website hosting and contact form, our appointment scheduling facility and our mailing list platform; (b) our professional advisers, including our attorneys and auditors, where necessary and subject to obligations of confidentiality; (c) a court, regulator, law enforcement agency or other authority, where we are required to do so by law or by a court order, warrant, subpoena or similar process; and (d) a third party acquiring all or substantially all of our business or assets, in which event we will notify you of the

transaction and require the acquirer to process your Personal Information in accordance with this Policy.

7.2 Every Operator we appoint is required, in terms of a written contract concluded with us as contemplated in sections 20 and 21 of POPIA, to process Personal Information only with our knowledge or authorisation, to treat it as confidential, and to establish and maintain the security measures required by section 19 of POPIA.

7.3 We require each Operator to notify us immediately where there are reasonable grounds to believe that Personal Information has been accessed or acquired by any unauthorised person.

8. Transfers Outside South Africa

8.1 Some of the Operators referred to in clause 7.1 host or process Personal Information outside the Republic of South Africa.

8.2 We will only transfer your Personal Information to a recipient in a foreign country where one or more of the conditions in section 72 of POPIA is met, namely where: (a) the recipient is subject to a law, binding corporate rules or a binding agreement which provides an adequate level of protection substantially similar to POPIA and which includes provisions for onward transfers; (b) you consent to the transfer; (c) the transfer is necessary for the performance of a contract between you and us, or for the conclusion or performance of a contract concluded in your interest between us and a third party; or (d) the transfer is for your benefit and it is not reasonably practicable to obtain your consent, and if it were, you would be likely to give it.

8.3 Where you are located in the European Union or the United Kingdom, additional rights may be available to you under the General Data Protection Regulation (EU) 2016/679 or the United Kingdom General Data Protection Regulation read with the Data Protection Act 2018. Nothing in this Policy limits those rights. You may exercise them by contacting our Information Officer.

9. Data Storage and Security

9.1 We take appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of your Personal Information and to protect it from loss of, damage to or unauthorised destruction, and from unlawful access to or processing. Information submitted through the contact form, calendar bookings, and mailing list subscriptions is stored securely and is only accessible by those of our personnel who require access to it in order to perform their duties.

9.2 No method of transmission over the internet is entirely secure. While we take the measures described above, the transmission of information to us over the internet is at your own risk.

9.3 Where there are reasonable grounds to believe that your Personal Information has been accessed or acquired by an unauthorised person, we will notify the Regulator and you as soon as reasonably possible after discovering the compromise, having regard to the legitimate needs of law enforcement and any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of our systems.

10. How Long We Keep Your Personal Information

10.1 We retain your Personal Information only for as long as is necessary to achieve the purpose for which it was collected, unless its retention is required or authorised by law, you have consented to its retention, or we require it for the establishment, exercise or defence of a legal claim.

10.2 Where we no longer have a lawful basis to retain your Personal Information, we will destroy or delete it, or de-identify it, in a manner that prevents its reconstruction in an intelligible form.

11. Your Rights and Opting Out

11.1 You have the right to be notified that we are collecting your Personal Information and to be notified where it has been accessed by an unauthorised person; to request access to the Personal Information we hold about you and to be advised of the identity of any third party who has had access to it; to request that we correct or delete Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained; to object, on reasonable grounds, to our processing of your Personal Information; to withdraw any consent you have given us at any time; not to be subject to a decision based solely on automated processing; and to submit a complaint to the Regulator.

11.2 You may exercise these rights by contacting our Information Officer using the details in clause 14. A request for access to, or correction or deletion of, Personal Information must be made on the prescribed form.

11.3 We will respond to your request within 30 (thirty) calendar days of receiving it. A prescribed fee may be payable in respect of a request for access to Personal Information, in which event we will notify you of the fee before processing the request.

11.4 You may unsubscribe from our mailing list at any time by clicking the "Unsubscribe" link at the foot of any e-mail we send you, or by contacting our Information Officer. Withdrawing your consent does not affect the lawfulness of any processing carried out before the withdrawal.

12. Complaints

12.1 If you are unhappy with the way we have handled your Personal Information, please contact our Information Officer using the details in clause 14 and set out the nature of your concern. A complaint may be made orally or in writing, but an oral complaint must be confirmed in writing within 5 (five) business days. We will review your complaint and respond to you in writing within 14 (fourteen) business days.

12.2 You are also entitled at any time to lodge a complaint with the Information Regulator, whose contact details are:

Information Regulator (South Africa)

Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191

Telephone: 010 023 5200 | Toll free: 0800 017 160

E-mail (POPIA complaints): POPIAComplaints@inforegulator.org.za

E-mail (general enquiries): enquiries@inforegulator.org.za

Website: <https://inforegulator.org.za>

13. Children

13.1 The Website and our booking facility are intended for use by adults. We do not knowingly collect or process the Personal Information of any person under the age of 18 years.

13.2 Section 34 of POPIA prohibits the processing of the Personal Information of a child except in the limited circumstances set out in section 35, which include processing with the prior consent of a

competent person. If you are under the age of 18, please do not submit Personal Information to us without the consent and involvement of your parent or guardian.

13.3 If we become aware that we have collected Personal Information from a child without the required consent, we will delete that information without undue delay. If you believe that we hold such information, please contact our Information Officer.

14. Our Information Officer

14.1 All questions, requests and complaints concerning this Policy or your Personal Information should be addressed to our Information Officer:

Information Officer: Louis Schutte

Postal address: 1 Wedgewood Link Rd, Bryanston, Johannesburg, 2191, South Africa

E-mail: louis@gabrienne.com

14.2 Our Information Officer is registered with the Regulator as required by section 55 of POPIA and the regulations made under it.

15. Changes to This Policy

15.1 We may update this Privacy Policy from time to time to reflect changes in our processing activities or in applicable law. Any changes will be posted on this page with an updated revision date, and the amended Policy will take effect from the date of publication.

15.2 Where an amendment materially affects the way in which we process your Personal Information, we will take reasonable steps to bring it to your attention before it takes effect. We encourage you to review this Policy periodically.

15.3 This Policy is governed by the laws of the Republic of South Africa.