A2X Privacy Policy

February 2026

A2X MARKETS

1st floor, 155 West Street, Sandton, Johannesburg, 2031.
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www.a2x.co.za

A2X Markets is an exchange licensed in terms of the Financial Markets Act, 2012

Table of Contents

1. Purpose 3
2. About A2X 3
3. Key Concepts 3
4. Terms of use of Website 4
5. Information Security Measures 4
6. Google Analytics, LinkedIn Insights, Statcounter and Cookies 5
7. Purpose for which we Collect and Use Information 6
8. Schedule of Information Held by A2X 8
9. Changes to this Policy 10

1. Purpose

The purpose of this policy is to set out, in a transparent manner, what and how personal information is processed and protected by A2X Markets (Pty) Ltd ("A2X"). A2X is committed to protecting the constitutional right to privacy while advocating transparency in all its business activities.

The latest version of this policy must always be consulted and can be found on www.a2x.co.za.

This policy applies to all visitors of the A2X website www.a2x.co.za, and by continuing to use or peruse the A2X website, consent will be deemed to be granted for the processing of any information collected through this medium.

2. About A2X

A2X, is a licenced stock exchange in terms of the Financial Markets Act, 2012 and regulated by the Financial Sector Conduct Authority (FSCA) and the Prudential Authority (PA) division of the South African Reserve Bank (SARB).

Physical Address:
1st floor, 155 West Street, Sandton, Johannesburg, 2031
Postal Address:
PO Box 781763, Sandton, 2196
Contact Number: (011) 088-5006
Email Address: info@a2x.co.za
Website Address: www.a2x.co.za
Information Officer: Kevin Brady, Kevin.Brady@a2x.co.za
Designated Information Officer: Palesa Manana, Palesa.Manana@a2x.co.za

3. Key Concepts

3.1 ***Consent*** means any voluntary, specific and informed expression agreeing to the processing of PI;

3.2 ***Cookies*** means text files stored within a web browser to identify visitors of a website and are used for website and user experience improvement.

3.3 ***Data Subject*** means the person or entity to whom the information relates.

3.4 ***Personal Information (PI)*** means information relating to a living person (including juristic) and includes, but not limited to race, gender, sex, marital status, financial, criminal and contact information.

3.5 ***Processing*** means the collection, receipt, recording, storing, distributing, updating, modifying, deleting, destroying or using of personal information.

3.6 ***Responsible Party*** means we or us at A2X who determines the purpose of and means for processing personal information.

3.7 ***We, us, our*** refers to A2X.

4. Terms of use of Website

A2X may, during the course of your use of the A2X website, electronically collect, store and use your personal information including your country of residence, non-personal browsing habits, click patterns, e-mail address and IP address. This will be for internal use only. A2X will do all that is reasonably possible to protect such personal information from unauthorised use or disclosure.

5. Information Security Measures

We are committed to ensuring that any personal information processed by us is secure and safeguarded through the use of physical and electronic access and security controls as well as internal policies and procedures to prevent unauthorised access, leaks or disclosure.

Any person who delivers or attempts to deliver any damaging code to our website or attempts to gain unauthorised access to any page on this site or to any personal information held by A2X shall be prosecuted and civil damages shall be claimed in the event that we or any of our clients suffer any damage or loss.

6. Google Analytics, LinkedIn Insights, Statcounter and Cookies

6.1 The Google Analytics features implemented on our website are based on Display Advertising (e.g., Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager integration, or Google Analytics Demographics and Interest Reporting).

6.2 Visitors can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using the Ads Settings.

6.3 We will not facilitate the merging of personally-identifiable information with non-personally identifiable information previously collected from Display Advertising features that is based on the DoubleClick cookie unless prior notice of, and the user's prior affirmative (i.e., opt-in) consent to, that merger is given.

6.4 A2X and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on someone's past visits to your website.

6.5 Cookies are used to identify an IP address and remarket relevant advertising material to interested parties.

6.6 We use Statcounter to collect information in terms of the following: Time and date of visit; IP address (this is a numerical label assigned to a device by an Internet Service Provider to enable the device to access the internet); browser and operating system (this can help us to make sure that our website functions correctly in the browsers/operating systems used to access our site); device Information e.g. device type and screen size (this can help us to make sure that our website functions correctly in the devices used to access our site); and referring data e.g. a search engine link (this can help us to understand which search engines are helping visitors to find our website).

7. Purpose for which we Collect and Use Information

We process personal information (supplied to us voluntarily) of our clients for purposes of administering certain services in line with the A2X product(s) offering. If a client refuses to supply the required information, the services offered to the client may be limited or not possible to provide. We also process information for purposes of complying with legislative and regulatory requirements as well as the A2X Rules, Directives and Listings Requirements.

Some of the main purposes for which we collect and process information include, but are not limited to, the following and any related purposes:

7.1 Application, assessment, approval and facilitation of listing qualifying securities on the exchange platform;

7.2 Application, assessment, approval and facilitation of the admission of authorised users on the exchange platform;

7.3 Payment to and from creditors and debtors;

7.4 Facilitating of trading, clearing and settling of securities on the exchange platform;

7.5 Research, analytical, statistical, and marketing;

7.6 Provision of market data;

7.7 Risk and compliance management; and

7.8 Regulatory and supervisory obligations placed on the exchange, including trade surveillance.

Please note:

7.9 If we wish to use your information for any other unrelated purpose, we will only do so with your permission, unless we are obliged by law or contract;

7.10 You have the right to object to the processing of your Personal Information;

7.11 You have the right to contact us and request that we correct or delete any information that is not accurate or up to date or information we are not obliged to retain by law;

7.12 You must lodge a complaint with us if you feel that we have not processed your information in accordance with the law by emailing full details of your complaint to complaints@a2x.co.za;

7.13 If, after you have complained to us in terms of 7.12 above, and you are not satisfied with our response, you may contact the Information Regulator and lodge a complaint. The contact details are:

JD House,
27 Stiemens Street,
Braamfontein,
Johannesburg,
2001
Tel: 010 023 5200
Email: enquiries@inforegulator.org.za

7.14 You have a responsibility to ensure that you keep your Personal Information confidential and do not disclose such details to anyone, which may include passwords, pin numbers etc.

7.15 You may contact us to ascertain what information we hold on you in terms of POPIA and PAIA. Please refer to the POPIA and PAIA Manual on our website.

7.16 By law, we are required to retain certain information. This is done in terms of the following, non-exhaustive list of legislation:

a. Basic Conditions of Employment Act, 75 of 1997;
b. Companies Act, 71 of 2008;
c. Electronic Communications and Transactions Act, 25 of 2002;
d. Employment Equity Act, 55 of 1998;
e. Financial Markets Act, 19 of 2012;
f. Income Tax Act, 58 of 1962;
g. Labour Relations Act, 66 of 1995;
h. Occupational Health and Safety Act, 85 of 1993;
i. Promotion of Access to Information Act, 2 of 2000;
j. Unemployment Insurance Act, 63 of 2001; and
k. Value Added Tax Act, 89 of 1991.

7.17 We accept no liability, nor do we afford any warranties in respect of privacy policies of any other website, including third party websites.

8. Schedule of Information Held by A2X

The table below highlights the types, nature and availability of information collected and held by A2X.

Type of Information	Nature of Information	Freely Available	On Request
Issuers	Application Forms		x
	Approval Letters		x
	Company Announcements	x	
Members	Application Forms		x
	Financial Information		x
	Policies and Procedures		x
	Directors Details		x
	Employee Details		x
	Technology & Systems		x
Settlement Agents	Application Forms		x
	Approval Letters		x
Post Trade	SWIFT Data		x
	MeCRAS Data including Broker Client Data		x
	Capital Adequacy Calculations and Reports		x
	Daily Trades and Allocations		x
	Broker Transactional Data		x
	Capital Exposure Requirements		x
	Clearing and Settlement transactions		x
	RisCura Data		x
Legal and Regulation	A2X Rules	x	
	A2X Directives	x	
	A2X Listings Requirements	x	
	Contracts / Agreements		x
	Legal Opinions		x
	Licence Applications		x
	Regulatory Reports		x
	A2X Internal Policies	x	

	Board and Sub Committee Meeting Records		x
	Board and Shareholder Resolutions Register		x
	Compliance and Risk Management Reports		x
	A2X Insurance Policies		x
	Complaints Register		x
	Conflicts of Interest Register		x
	Fit and Proper Register		x
	Staff Trading Approvals		x
Human Resources	Employee Personal Details		x
	Recruitment Files		x
Proprietary	Audit and Financial		x
	Shareholding Register and Share Certificates		x
	Invoices		x
	Income Tax Returns and Certificates		x
	CIPC		x
Marketing	Newsletters	x	
	Market Statistics	x	
	Press Releases	x	
	Corporate Identity and Brand (CI guides)		x
	Logo's, Templates and Branding		x
	Social Media Accounts		x
	Advertising and Campaigns		x
	A2X Brochures	x	
Information Technology	Public Market Data Prices	x	
	Private Trade Data		x
	News Data (A2X News service)	x	
	A2X Website	x	
	Clearing Data		x
	Surveillance Data		x
	Internal Staff Data (e.g., emails)		x
	Vendor Details		x

9. Changes to this Policy

We reserve the right to change or update this policy from time to time and may notify you of such changes either by electronic communication or through notifications on the website. Data subjects are advised to ensure they are familiar with the latest version of this policy, as it will apply when using the A2X website.