



PRIVACY POLICY

This Privacy Policy complies with the Protection of Personal Information Act (POPIA) of South Africa and, where applicable, the General Data Protection Regulation (GDPR). It explains how we collect, use, and protect your personal information and your rights concerning data processing. You have the right to request access, correction, deletion, and restriction of your data. If you have any concerns, you may contact us or lodge a complaint with the Information Regulator of South Africa.

1 Introduction

This Privacy Policy outlines MSM's approach to collecting, using, and disclosing personal information in accordance with applicable South African laws. We process your personal data based on the following legal grounds:

- 1.1 To fulfill a contractual obligation with you.
- 1.2 You have given explicit consent for processing.
- 1.3 The processing is necessary for our legitimate business interests, provided it does not override your rights.
- 1.4 To comply with legal obligations.

2 Definitions

- 2.1 **Service:** The trading platform and associated services provided by MSM.
- 2.2 **Personal Information:** Data that identifies an individual, including but not limited to name, contact details, company details, and browsing habits.
- 2.3 **Data Controller:** MSM, as the entity determining the purpose and means of processing personal information.
- 2.4 **Data Processors:** Third parties processing personal data on behalf of MSM.
- 2.5 **Cookies:** Small data files stored on your device to improve user experience.

3 Data Subject Rights

- 3.1 As a data subject, you have the right to:
 - Request access to your personal data.
 - Correct, update, or delete your information.
 - Restrict or object to data processing.
 - Request data portability where applicable.
 - Withdraw consent at any time without affecting prior lawful processing.
 - Lodge a complaint with the Information Regulator of South Africa (IRSA).

4 Consent

- 4.1 **How We Obtain Consent:** We collect personal information through voluntary submission via our website, trading platform, advertisements, or manual interactions.
- 4.2 **Withdrawing Consent:** You may withdraw consent at any time by contacting us at reception@macsm.org.

5 Age of Consent

By using our services, you confirm that you are of the age of majority in your province of residence, or you have received parental/guardian consent for your minor dependents to access our services.

6 Information Collection

We collect the following personal data:

- 6.1 Identifiable information such as name, contact details, and location data.
- 6.2 Data from cookies and log files, including browsing history and IP addresses.
- 6.3 Transactional and trading activity within our platform.

7 Use of Information

We use collected data for:

- 7.1 Delivering and maintaining our services.
- 7.2 Providing customer support.
- 7.3 Conducting research and improving our services.
- 7.4 Notifying users of changes to our services.
- 7.5 Enforcing terms and legal compliance.
- 7.6 Marketing communications (users can opt out anytime via reception@macsm.org).

8 Sharing Information with Third Parties

- 8.1 We do not sell personal data.
- 8.2 We may share personal information with trusted service providers for operational purposes (e.g., hosting, security, analytics, and compliance).
- 8.3 Data may be disclosed if legally required or to protect MSM's legal rights.
- 8.4 MSM may transfer personal data to service providers outside South Africa. We ensure these transfers comply with adequacy decisions, binding corporate rules, or contractual safeguards to maintain data protection standards.

9 Security of Data

- 9.1 We implement industry-standard security measures, including:
 - Data encryption (BitLocker technology)
 - Access controls to limit data exposure
 - Secure data destruction practices
- 9.2 While we take all reasonable precautions, no online transmission is 100% secure.
- 9.3 In case of a data breach that may result in harm, MSM will notify affected users and relevant authorities within the required legal timeframe.

10 Retention of Data

- 10.1 We retain personal information for as long as necessary to:
 - Fulfill our contractual obligations
 - Comply with legal requirements
 - Support research and security efforts
- 10.2 Data is securely deleted once no longer required.

11 Cookies

- 11.1 We use cookies to enhance user experience and analyze site usage.
- 11.2 Users may opt to disable non-essential cookies through browser settings or by contacting us.

12 Links to Third-Party Services

Our website may contain links to external sites beyond our control. We are not responsible for their privacy practices and cannot be held liable for any loss or damage incurred from visiting or taking actions on their websites.

13 Changes to This Privacy Policy

MSM reserves the right to modify this policy at any time. Changes will be posted on our website with immediate effect.

14 Children's Privacy

We do not knowingly collect personal data from children under 18. If we become aware of such collection, we will delete the data promptly.

15 Applicable Laws

This policy is governed by the laws of the Republic of South Africa.

16 Contact Information

For any privacy-related concerns, contact us at: **Email:** reception@macsm.org

