

LUME TRADE Privacy Policy

(Version 1.2, last updated 15-01-2026)

1 OVERVIEW

This Policy and our Terms of Service, available on our website, apply when you use our online Services.

This Policy explains how we handle the Personal Information you give us or that we collect from you.

Please read this Policy together with the Terms of Service. If there is a conflict, the Terms of Service will apply.

Any terms defined in the Terms of Service have the same meaning here.

Our Services are not for children, and we do not collect information about them.

2 ABOUT THE COMPANY

Depending on which Terms of Service apply, either Lume Trade (Pty) Ltd (South Africa) or Lume Trade Limited (Canada) will handle your Personal Information. In this Policy, we refer to both as the “Company”, “we”, “us”, or “our”.

The Company has appointed an information officer. If you have questions about this Privacy Policy, please contact us using the details in section 3.

3 HOW TO REACH US

Our contact details are:

Legal name:	Lume Trade (Pty) Ltd	Lume Trade Limited
Company number:	2023/572397/07	1001327685
Address:	c/o Lumepay (Pty) Ltd 3 Dock Road Waterway House	100 King Street West 1 First Canadian Place, Unit 6200 Toronto, Ontario

	Waterfront Cape Town 8001 South Africa	M5X 1B8 Canada
Website:	www.lumetrade.com	
E-mail address:	legal@lumetrade.com	

You can make a complaint to the Information Regulator at any time if you have concerns about how your Personal Information is protected.

4 POLICY UPDATES AND KEEPING YOUR INFORMATION CURRENT

We regularly review and may update our Privacy Policy. If we make changes, we will let you know by email, through your user account, or by another approved electronic method.

Your Personal Information should be accurate and up to date. Please tell us if your details change while you use our Services.

5 INFORMATION WE GATHER

We may collect, use, store, and share different types of Personal Information about you, such as:

- Contact Information;
- Device Information;
- Financial Information;
- Identity Information;
- Location Information;
- Transaction Information;
- Usage Information.

We also collect, use, and share aggregated data, such as statistics and demographic information, for various purposes. This data may come from your Personal Information, but it does not identify

you. For example, we might use your Usage Information to see what percentage of users use a particular feature. If we ever combine this data in a way that could identify you, we will treat it as Personal Information and handle it in accordance with this Policy.

We do not collect any Special Personal Information about you. This includes details about your faith or philosophical beliefs, ethnicity, labour organisation affiliations, political views, medical records, sex life, biometric identifiers or criminal history.

6 METHODS OF INFORMATION COLLECTION

We collect and handle the following types of information about you:

- **Information that you share with us.** This includes Identity, Contact, and Financial Information you give when you fill out forms on our website or contact us by email, chat, or through our OTC Facility. It also includes information you provide when you register for an account. We keep records of all our communications.
- **Information that we automatically gather.** When you visit our website, we collect Personal Information, such as Device and Usage Information, using cookies and similar technologies.
- **Location Information.** We may use GPS technology to determine your current location.
- **Information from third parties.** Sometimes, we get Personal Information about you from third parties and public sources, such as company registries, online search engines, general search results, and screening providers.

7 TRACKING TECHNOLOGIES

We use cookies and similar tracking tools to identify you and remember your website preferences. This helps us give you the best experience when you use our Services.

The cookies we use help with site navigation and authentication. They expire after 60 minutes unless you are still active on the site.

Our cookies do not store any Personal Information and are protected with HTTPONLY and secure settings.

We use browser fingerprinting in cookies to help prevent cookie theft and use on other devices.

We do not store fingerprint data. All cookie data is encrypted and only decrypted on our secure backend systems.

8 INFORMATION USAGE PRACTICES

We use your Personal Information only when the law allows and for specific purposes. Most often, we use your Personal Information when:

- You have given your consent, and we need to perform under the Terms of Service;
- It is necessary for our legitimate interests or those of a third-party, and your interests and rights do not override those interests; and
- We need to comply with a legal or regulatory obligation.

9 SPECIFIC USES OF YOUR INFORMATION

Activity	Personal Information categories	Legal justification
To open a user account and register you as a user of the Services through our website	Identity Contact Financial Device	Your consent
To process actions related to the Services through our website, chat or OTC Facility	Identity Contact Financial Transaction Device Location	Your consent
To manage our relationship with you as a regulated business	Identity Contact Financial Transaction Device Location	Your consent Necessary for our legitimate interests Necessary to comply with legal or regulatory obligations

Activity	Personal Information categories	Legal justification
To administer the Services and their delivery including troubleshooting, data analysis and system testing	Identity Contact Device Location	Necessary for our legitimate interests
To monitor trends of your use of the Services and interaction with our website	Identity Contact Device Usage Location	Necessary for our legitimate interests

10 SHARING YOUR INFORMATION

By using our Services, you agree to provide your Personal Information and allow us to share it with the third parties listed below:

- Our banking and payment providers and group companies, so we can provide the Services;
- Financial intelligence, financial surveillance, central banks, law enforcement, and tax authorities, so we can comply with our legal obligations.

11 CROSS-BORDER TRANSFERS

We protect your Personal Information by making sure all our group companies follow the same rules and processes when handling your data.

Many of our third-party partners and IT service providers, including cloud service providers, are located outside your country. This means your Personal Information may be transferred or held internationally.

When we transfer or store your Personal Information outside your country, we make sure it is protected by using at least one of the following safeguards:

- We will only transfer or store your Personal Information in countries with privacy and security standards that are the same, similar, or stronger than those in your country.
- When we use certain service providers, we may use approved contracts that give your Personal Information the same protection it has in your country. We will always remain fully responsible for any actions taken by service providers we appoint to process your Personal Information.

12 PROTECTING YOUR INFORMATION

We store all the information you provide on secure servers. Payment transactions and necessary account actions are encrypted.

You are responsible for keeping your account login details private. Please do your best to prevent anyone else from using your account. If you notice any unauthorised access, let us know right away.

We use strict procedures and security features to help prevent your Personal Information from being lost, misused, or accessed without permission. This includes backups, regular maintenance, limited access, secure passwords, multifactor authentication, staff confidentiality agreements, encrypted communications, and a secure VPN for off-site access.

We have steps in place to handle any suspected data breach. If your Personal Information is affected, we will let you and any required regulator know as soon as possible.

13 HOW LONG WE KEEP YOUR INFORMATION

As a regulated business, we must keep basic information about our users, such as Contact, Identity, Financial, and Transaction Information, for specific periods as required by law. These periods vary by country. Usually, if you ask us in writing, we will delete or return your data when you close your account or end your relationship with us, unless the law requires us to keep it.

14 YOUR RIGHTS

In some cases, you have the following rights under Data Protection Laws and our Terms of Service regarding your Personal Information. These rights include:

- Requesting access to your Personal Information;
- Requesting the correction of your Personal Information;

- Requesting the erasure of your Personal Information;
- Objecting to the processing of your Personal Information;
- Requesting the restriction of the processing of your Personal Information;
- Requesting the transfer of your Personal Information;
- Withdrawing your consent.

If you want to know more about these rights or wish to use them, you can contact us anytime at legal@lumetrade.com