



NOVA SPIRE
—CAPITAL—



Address:

1002 Clifton Ave – Suite 3
Lyttelton Manor, Centurion, 0157



Email:

hello@novaspirecapital.com



Phone:

+27 83 268 6588 |
0860 10 10 93



novaspirecapital.com

Nova Spire Capital (Pty) Ltd Registration Number 2026/097975/07. Trading and investing involve risk. Past performance is not indicative of future results.

JUNE 2026 | NOVA SPIRE CAPITAL

Privacy Policy

How Nova Spire Capital collects, uses, shares and protects your personal information in accordance with the Protection of Personal Information Act, 2013 (POPIA) and applicable data protection laws.

Issuer	Nova Spire Capital (Pty) Ltd J/R of BOF Asset Management (Pty) Ltd
Regulator	Financial Sector Conduct Authority (FSCA) — FSP 53819
Registered Office	1002 Clifton ave, Lyttelton Manor Ex 3, Centurion, Gauteng, 0157, South Africa
Document Date	June 2026
Last Revised	17 June 2026
Contact	info@novaspirecapital.com +27 12 9400 800
Website	www.novaspirecapital.com

1. Who We Are

Nova Spire Capital (“we”, “us” or “our”) is a trading name of Nova Spire Capital (Pty) Ltd J/R of BOF Asset Management (Pty) Ltd, a financial services company registered in South Africa under number [2026/097975/07], authorised and regulated by the Financial Sector Conduct Authority (FSCA), with licence number 53819. Our registered office is 1002 Clifton ave, Lyttelton Manor Ex 3, Centurion, Gauteng, 0157, South Africa.

This Privacy Policy describes who we are, why we need to collect your information, how we use it, who we share it with and how we use data to improve the products and services we provide. We thank you for the trust you place in us when you visit our sites or use our products, and we take our responsibility to protect your information seriously.

We process personal information in accordance with the Protection of Personal Information Act, 2013 (POPIA) and apply the same data privacy standards to protect and secure your personal data wherever we provide online trading products or services to you. We act as the Responsible Party (data controller) of your personal information.

Any reference to “you” or “your” in this policy is a reference to any of our clients, potential clients or people visiting our websites, as the context requires.

2. Personal Information We Collect

As part of providing our products and services, we are required by law to execute Know Your Customer (KYC) checks to verify your identity before we set you up as a client. We use those details to effectively manage your account and ensure you receive the best possible service.



NOVA SPIRE
—CAPITAL—



Address:

1002 Clifton Ave – Suite 3
Lyttelton Manor, Centurion, 0157



Email:

hello@novaspirecapital.com



Phone:

+27 83 268 6588 |
0860 10 10 93



novaspirecapital.com

Nova Spire Capital (Pty) Ltd Registration Number 2026/097975/07. Trading and investing involve risk. Past performance is not indicative of future results.

Categories of personal information

- **Identity data:** title, first name, last name, date of birth, gender, account number or similar identifier.
- **Contact data:** billing address, residential address, email address and telephone number.
- **Financial and source-of-wealth data:** assets and liabilities, account balances, trading statements, tax and financial statements, government-issued documentation, employment and profession details.
- **Technical data:** IP address, browser type and version, time zone, plug-ins, operating system and device information.
- **Payment data:** user ID tokens from payment service providers, bank account details and payment card details.
- **Profile data:** username and password, trading performance, transaction data, notes, interests, preferences, feedback, survey responses, chat and call recordings.
- **Usage data:** how you use our website, products and services.
- **Marketing data:** your preferences for receiving marketing from us and selected third parties.

We obtain this information through your use of our services or other dealings with us, including via our websites, account-opening applications, contact forms, telephone, internet chat, demo account sign-up forms, webinar sign-ups and ongoing client correspondence. We may also collect information from third parties such as customer due diligence providers, sanctions screening providers, credit reference agencies, publicly available sources and screened third-party data lists.

We also keep records of your trading behaviour, including suspicious transactions and orders, product preferences, financial transactions and performance, and historical data about the trades and investments you have made.

3. Cookies and Website Use

We use cookies — small pieces of text stored on your device when you visit our websites or use our apps — to monitor traffic patterns, understand usage and deliver a more relevant experience. The information collected is generally anonymous. For full details please refer to the Cookie Notice on our website, which forms part of this Privacy Policy.

4. How and Why We Use Your Information

We only use your personal information where we have a lawful basis for doing so: to comply with our legal and regulatory obligations; to perform our contract with you or take pre-contract steps at your request; for our legitimate interests or those of a third party; or where you have given consent. A legitimate interest is a business or commercial reason to use your information, provided it is not overridden by your own rights and interests.



NOVA SPIRE
—CAPITAL—



Address:

1002 Clifton Ave – Suite 3
Lyttelton Manor, Centurion, 0157



Email:

hello@novaspirecapital.com



Phone:

+27 83 268 6588 |
0860 10 10 93



novaspirecapital.com

Nova Spire Capital (Pty) Ltd Registration Number 2026/097975/07. Trading and investing involve risk. Past performance is not indicative of future results.

Purpose	Lawful Basis
Provide products, services and support to you.	Performance of our contract with you; legitimate interest in delivering excellent customer service.
Prevent and detect crime, including fraud against you and the public.	Legitimate interest in minimising fraud that could harm us and you.
Identify and verify customers; screen for sanctions and embargoes.	Compliance with legal and regulatory obligations (KYC/AML/CTF).
Respond to audits, enquiries, legal claims, complaints or investigations.	Legal and regulatory obligations; legitimate interest in defending claims.
Ensure internal policies (data retention, security) are followed.	Legitimate interest in operating efficiently and delivering quality service.
Improve efficiency, training and quality control.	Legitimate interest in operational efficiency.
Protect commercially sensitive information.	Legitimate interest; legal and regulatory obligations.
Statistical analysis to manage our business.	Legitimate interest in business management.
Prevent unauthorised access to and modifications of systems.	Legitimate interest; legal and regulatory obligations.
Update and enhance customer records.	Performance of contract; legal obligation; legitimate interest.
File statutory returns.	Compliance with legal and regulatory obligations.
Ensure safe working practices and staff administration.	Legal obligation; legitimate interest in operational standards.
Market our services and selected third-party services.	Legitimate interest in promoting our business; consent where required.
Conduct credit reference checks.	Legitimate interest in assessing creditworthiness.
External audits and accreditation quality checks.	Legitimate interest; legal and regulatory obligations.

The above table does not apply to special category personal information, which we will only process with your explicit consent.



NOVA SPIRE
—CAPITAL—



Address:

1002 Clifton Ave – Suite 3
Lyttelton Manor, Centurion, 0157



Email:

hello@novaspirecapital.com



Phone:

+27 83 268 6588 |
0860 10 10 93



novaspirecapital.com

Nova Spire Capital (Pty) Ltd Registration Number 2026/097975/07. Trading and investing involve risk. Past performance is not indicative of future results.

5. Promotional Communications

We may use your personal information to send you updates (by email, SMS, phone or post) about our products and services, including exclusive offers, promotions or new products. Where consent is required, we will ask for it separately and clearly. We will never sell or share your personal information with organisations outside our group for marketing purposes. You may withdraw consent or opt out of marketing at any time by contacting us using the details below or by using the 'unsubscribe' link in any email.

6. Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another compatible purpose permitted by law. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis. We may, however, process your data without your knowledge or consent where required or permitted by law.

7. Who We Share Your Information With

We may disclose your information to:

- Our related entities within the group.
- Third-party service providers (electronic identity verification agencies, specialist advisers, IT, financial, compliance, insurance and research providers).
- Introducers, brokers and marketing agents with whom we have a relationship.
- Credit providers, courts, tribunals and applicable regulatory authorities.
- Marketing agencies, website hosts and other operational service providers.
- Credit reporting or reference agencies; crime prevention agencies.
- Debt recovery agencies; trace agents for debtors or beneficiaries.
- Anyone you have authorised.

We only allow service providers to handle your personal information where we are satisfied they will take appropriate measures to protect it, and we impose contractual obligations to ensure they use your data only as instructed by us. We may also share information with external auditors and regulatory bodies, and with potential buyers in the event of a corporate restructuring or sale.

8. International Transfers

To deliver a 24/5 service it is sometimes necessary to transfer your personal information overseas — to our related entities, service providers, or your service providers on your instruction. Any such transfer will comply with our obligations under POPIA and other applicable data protection laws. Our standard practice is to rely on data protection contract clauses approved by the relevant regulatory or supervisory authority.



NOVA SPIRE
—CAPITAL—



Address:

1002 Clifton Ave – Suite 3
Lyttelton Manor, Centurion, 0157



Email:

hello@novaspirecapital.com



Phone:

+27 83 268 6588 |
0860 10 10 93



novaspirecapital.com

Nova Spire Capital (Pty) Ltd Registration Number 2026/097975/07. Trading and investing involve risk. Past performance is not indicative of future results.

9. Data Retention

We keep your personal information while you have an account with us or while we are providing products or services to you. Thereafter we retain it as long as necessary to respond to questions, complaints or claims, to demonstrate regulatory compliance, and to meet legal record-keeping requirements. Different retention periods apply to different categories of personal information; once retention is no longer necessary, we delete or anonymise the data.

10. Your Rights

Right	Explanation
Access	Ask us to provide a copy of your personal information.
Rectification	Ask us to correct or update inaccurate or out-of-date information.
Erasure	Ask us to delete your personal information where no law or regulation requires us to retain it.
Restriction of processing	Ask us to restrict processing in certain circumstances, e.g. where you contest accuracy.
Data portability	Receive your personal data in a structured, commonly used, machine-readable format.
Object	Object at any time to processing for direct marketing or, in certain situations, to processing based on legitimate interests.
Automated decision-making	The right not to be subject to a decision based solely on automated processing that produces legal or similarly significant effects.

You can exercise these rights free of charge by contacting us using the details below. We reserve the right to charge a reasonable administrative fee where a request is manifestly unfounded or excessive.

11. Keeping Your Information Secure

We follow strict security procedures and protocols in connection with the storage, processing and disclosure of your information to prevent it from being lost, accessed without authorisation, altered or disclosed. We maintain a data breach response procedure and will notify you and the Information Regulator of any breach where required under POPIA. Third parties with whom we share data must apply security measures at least as rigorous as our own.



NOVA SPIRE
—CAPITAL—



Address:

1002 Clifton Ave – Suite 3
Lyttelton Manor, Centurion, 0157



Email:

hello@novaspirecapital.com



Phone:

+27 83 268 6588 |
0860 10 10 93



novaspirecapital.com

Nova Spire Capital (Pty) Ltd Registration Number 2026/097975/07. Trading and investing involve risk. Past performance is not indicative of future results.

12. Technology, Third-Party Sites and Liability

We continuously improve our websites and applications. Whilst we take appropriate technical and organisational measures, we accept no liability if communications are intercepted, incorrectly delivered or not delivered by third parties. Our websites may contain links to third-party sites — this Privacy Policy applies only to information we collect, and you should review the privacy policy of any third-party site you visit.

13. How to Contact Us

Nova Spire Capital (Pty) Ltd

1002 Clifton ave, Lyttelton Manor ex 3, Centurion, Gauteng, 0157, South Africa

Email: info@novaspirecapital.com

Telephone: +27 12 9400 800

Website: www.novaspirecapital.com

If you are not satisfied with our response, you have the right to lodge a complaint with the Information Regulator of South Africa: +27 (10) 023 5200, enquiries@infoeregulator.org.za, <https://infoeregulator.org.za/>. We would, however, appreciate the opportunity to address your concerns first.

14. Policy Review and Changes

This Privacy Policy was last updated on 17 June 2026. It is reviewed periodically to take account of new obligations, technological developments, operational changes and the evolving regulatory landscape. We will notify you of material changes through your usual method of communication.

Nova Spire Capital J/R of BOF Asset Management (Pty) Ltd, registration number [2026/097975/07], is authorised and regulated by the Financial Sector Conduct Authority (FSCA), FSP 53819. This document forms part of the legal terms governing the relationship between Nova Spire Capital and its clients and should be read in conjunction with the Client Agreement and other policies published at www.novaspirecapital.com.