FOREX BALLERS CLUB

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended

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Issued by

1. DEFINITIONS AND ABBREVIATIONS

PAIA: Promotion of Access to Information Act 2 of 2000, as amended.

POPIA: Protection of Personal Information Act 4 of 2013.

Information Officer: The person designated by law as the Information Officer of the Company and responsible for the functions assigned under PAIA and POPIA.

Regulator: The Information Regulator of South Africa.

Company / FBC: Forex Ballers Club (Pty) Ltd.

FBC Ultra: The Company's proprietary trading indicator and associated analytical tools.

Ultra Workspace: The Company's members' portal and user-management environment, including the trade journal, Ultra Charts, educational resources, achievements and saved preferences.

Ultra Charts: The Company's proprietary charting platform and associated charting functionality.

Services: Collectively, FBC Ultra, Ultra Workspace, Ultra Charts, the Company's website and associated software, platforms, applications, tools, features and functionality.

2. PURPOSE OF THIS MANUAL

This manual is published in terms of section 51 of PAIA. It explains how a person may request access to records held by the Company and describes the categories of records held, records that may be available without a formal request, and the Company's processing of personal information.

This manual is intended to assist members of the public, customers, members, suppliers, service providers and other interested persons. Access to records is subject to PAIA, including the applicable procedural requirements and grounds for refusal.

A requester seeking access to a record of a private body must identify the right to be exercised or protected and explain why the requested record is required for that purpose, as required by section 50 of PAIA.

3. CONTACT DETAILS FOR ACCESS TO INFORMATION

Private body: Forex Ballers Club (Pty) Ltd

Phillip Bazil Cronje is the registered Information Officer of Forex Ballers Club (Pty) Ltd for purposes of PAIA and POPIA. Requests should be addressed to the Information Officer, Forex Ballers Club (Pty) Ltd.

Information Officer email: forexballersclub@gmail.com

Telephone / WhatsApp: +27 69 382 3136 / +27 67 847 9389

Physical address: 9 Lake Como, Royal Palm Estate, Ballito, KwaZulu-Natal, 4392, South Africa

Website: https://www.forexballersclub.com

General access-to-information contact: forexballersclub@gmail.com

Deputy Information Officer: The Company has not appointed a Deputy Information Officer. All PAIA and POPIA enquiries and requests must be directed to the Information Officer using the contact details above.

Fax: The Company does not publish a fax number for access-to-information requests.

4. GUIDE ON HOW TO USE PAIA

The Information Regulator has published a Guide explaining how to exercise rights under PAIA and POPIA. The Guide includes information about the objects of the Acts, how to make requests, assistance available from the Regulator, remedies available to requesters, and applicable fees and regulations.

The Guide may be obtained from the Information Regulator's website at https://inforegulator.org.za/paia/ or requested from the Company at forexballersclub@gmail.com.

The Regulator's PAIA page provides the current prescribed forms, including Form 02 (Request for Access to Record), Form 03 (Outcome of Request and Fees Payable), and Form 05 (Complaint Form). The prescribed forms and guidance should be checked on the Regulator's website when making a request.

Information Regulator contact: Website: https://inforegulator.org.za/ | Email: enquiries@inforegulator.org.za | Telephone: 010 023 5200 | Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191, South Africa.

5. RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

The following records are generally made available to the public without the need to submit a formal PAIA request, subject to availability and any applicable restrictions:

Category of records	Examples	Access
Website information	Public website pages, service descriptions, published policies, terms, risk disclaimer, refund and cancellation information, FAQs and public announcements.	Website
PAIA and privacy information	This PAIA Manual and the Company's published Privacy Policy.	Website
Product information	Publicly available descriptions of FBC Ultra, Ultra Workspace and Ultra Charts, feature information and educational or promotional material published for public access.	Website / upon request where available
General enquiries	Non-confidential information that the Company elects to provide in response to general enquiries.	Upon request

6. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

The Company maintains records in accordance with legislation applicable to its activities. The existence of a category below does not mean that every listed record is created or held in every circumstance. Access remains subject to applicable statutory restrictions and PAIA.

Category of record	Applicable legislation
Company incorporation and governance records	Companies Act 71 of 2008
Company accounting, tax and supporting financial records	Companies Act 71 of 2008; Tax Administration Act 28 of 2011; and other applicable tax legislation
Personal-information processing and privacy records	Protection of Personal Information Act 4 of 2013

Access-to-information records and this manual	Promotion of Access to Information Act 2 of 2000, as amended
Electronic records, transactions and communications	Electronic Communications and Transactions Act 25 of 2002, where applicable
Customer and consumer records	Consumer Protection Act 68 of 2008, where applicable
Employment and contractor records	Applicable employment and labour legislation, where applicable

7. SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS

The Company holds records relating to its corporate, commercial, customer, technology and administrative activities. The categories below are descriptive and do not guarantee that every record exists or is retained.

Subject	Categories of records held
Corporate governance and administration	Incorporation documents; company registration and statutory records; governance and management records; policies; internal procedures; and business correspondence.
Finance, accounting and taxation	Accounting records; invoices; payment and transaction confirmations; subscription and revenue records; tax returns and supporting documents; financial statements; and banking or payment-provider correspondence.
Customers, members and subscriptions	Registration and account records; contact details; account approvals; subscription tiers and status; access permissions; expiry dates; customer correspondence; support requests; and account-administration records.
Products, platforms and technology	Product specifications; platform documentation; chart and indicator functionality records; system configurations; technical logs; database and access-control records; development and maintenance records; and service-provider documentation.
Trade journal and workspace information	Member-created trade-journal entries; trading notes; screenshots; saved drawings; indicator configurations; watchlists; chart themes; preferences; educational progress; quiz results; and achievement records.
Website, marketing and communications	Website content; public product descriptions; promotional material; customer communications; website enquiries; and records of service-related communications.
Contracts, legal and compliance	Terms of Service; Privacy Policy; Refund and Cancellation Policy; risk disclaimers; electronic acceptance records; contracts; PAIA and POPIA compliance records; complaints; disputes; and legal correspondence.
Suppliers and service providers	Service agreements; supplier details; business correspondence; invoices; service and security documentation; and payment records.
Security and access management	Authentication records; login and session records; device registration information; IP and approximate location information; failed login attempts; access reviews; security investigations; and incident records.
Personnel and human resources	Personnel, contractor, remuneration, engagement and administrative records, to the extent applicable and held by the Company.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of processing: The Company processes personal information for account registration and administration; identity and account verification; authentication and access management; subscription administration; delivery and operation of the Services; customer support; security and prevention of unauthorised access; legal-document acceptance records; payment and transaction administration; dispute resolution; technical analysis and service improvement; compliance with legal obligations; and protection of the Company's rights and systems.

8.2 Categories of data subjects and information: Customers and members: names or nicknames, email addresses, mobile numbers, account identifiers, usernames, account and subscription status, access permissions, profile information, authentication and device records, approximate IP-derived location, legal acceptance records, trade-journal entries, trading notes, screenshots, chart settings, watchlists, educational progress, achievements and support communications.

Prospective customers and website visitors: contact details voluntarily submitted, website and checkout interaction records, technical logs, browser and device information, IP addresses and transaction enquiries, where collected.

Suppliers and service providers: business contact details, correspondence, contractual and service-administration records, and payment or transaction details where applicable.

Employees, contractors and business representatives: relevant identification, contact, employment or engagement, administrative, payment and correspondence records, to the extent applicable and held by the Company.

Requesters and complainants: contact details, identity-verification information, the content of requests or complaints, correspondence and records necessary to process and respond to the request.

8.3 Recipients or categories of recipients: Personal information may be made available, where necessary for the stated purposes and subject to applicable safeguards, to authorised Company personnel; website and hosting providers including Wix; payment gateway and payment-processing provider Peach Payments; cloud infrastructure, database, authentication, storage, content-delivery and transactional-email service providers; market-data providers used by Ultra Charts, which may include Deriv, Binance and Hyperliquid; professional advisers; auditors; insurers; courts, law-enforcement agencies, regulators and other persons where disclosure is required or authorised by law or reasonably necessary to protect rights, users or systems.

The Company does not sell members' personal information as a commercial data product. The precise role of each provider depends on the processing activity and applicable contractual arrangements.

8.4 Planned transborder flows: The Company's primary managed backend database and storage infrastructure are hosted in Dublin, Ireland (European Union), in the Amazon Web Services (AWS) eu-west-1 region. Other services, including content delivery, email delivery, cloud storage and third-party market-data services, may involve processing in other jurisdictions depending on the provider's infrastructure and configuration. Where personal information is transferred to or processed outside South Africa, the Company will take reasonable steps to ensure that the transfer complies with section 72 of POPIA and other applicable legal requirements.

8.5 General description of information security measures: The Company uses technical and organisational safeguards appropriate to the nature of the information and the risks of processing. Measures described in the Company's Privacy Policy include authenticated access and session controls; password hashing through the authentication infrastructure; database-level Row-Level Security; device and session restrictions; private

storage arrangements for relevant uploaded assets; HTTPS/TLS encrypted connections, including TLS 1.3 and HSTS where configured and supported; encryption at rest where enabled by the relevant infrastructure and service configuration; administrative access restrictions; and security monitoring and technical troubleshooting. No electronic system can be guaranteed to be completely secure.

9. HOW TO REQUEST ACCESS TO RECORDS

9.1 Form of request: A requester must submit a request in the prescribed Form 02 (Request for Access to Record), available from the Information Regulator's website. The request must be directed to the Information Officer at forexballersclub@gmail.com or delivered to the Company's physical address stated in section 3.

9.2 Information to be supplied: The requester must provide sufficient particulars to enable the Company to identify the requester and locate the record. The request must describe the record with reasonable clarity, state the right to be exercised or protected, and explain why the record is required for that purpose. If the requester acts on behalf of another person, proof of authority may be required.

9.3 Identity verification: The Company may take reasonable steps to verify the identity and authority of a requester before releasing records, particularly where the request concerns personal information or confidential records.

9.4 Assistance: A requester who requires assistance to complete the prescribed form may contact the Information Officer. The Company will provide assistance to the extent required by PAIA.

9.5 Decision and time periods: The Company will consider and decide a request within the period prescribed by PAIA. Where the Act permits an extension, the requester will be notified in the prescribed manner and within the prescribed time. If access is refused in whole or in part, the Company will provide the decision and reasons to the extent required by law.

9.6 Fees: Fees may be payable in accordance with PAIA and the applicable Regulations. Where a fee is payable, the Company will provide the prescribed notice setting out the applicable fee before processing continues, as required by law. No fee amount is stated in this manual because prescribed fees may be amended from time to time.

9.7 Grounds for refusal: Access may be refused only on a ground permitted by PAIA. Depending on the record and circumstances, grounds may include protection of another person's personal information; protection of commercial information or trade secrets; protection of confidential information; protection of safety of individuals or property; privileged legal records; or other grounds set out in PAIA. Where reasonably possible, a record may be disclosed with the exempt portion severed.

9.8 Remedies: A requester who is dissatisfied with a decision concerning a request to a private body may lodge a complaint with the Information Regulator in accordance with PAIA and the applicable Regulations, including by using Form 05. The Regulator's current complaint procedure and prescribed forms are available at https://inforegulator.org.za/paia/ and https://inforegulator.org.za/complaints. A requester may also pursue any court remedy available under PAIA.

10. AVAILABILITY OF THIS MANUAL

This manual is available on the Company's website at https://www.forexballersclub.com, or may be requested by email from forexballersclub@gmail.com. A copy may also be requested from the Information Officer at the physical address in section 3. A copy will be made available to the Information Regulator upon request.

Where a fee for a copy is lawfully payable, the applicable prescribed fee will be communicated to the requester.

11. UPDATING OF THIS MANUAL

The Company will review and update this manual when required to reflect material changes to its operations, record holdings, personal-information processing activities, contact details or applicable legal requirements.

ISSUED BY

Forex Ballers Club (Pty) Ltd

Information Officer / Head of the Private Body

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