Webull Securities (Australia) Pty. Ltd. / Webull Securities South Africa (Pty) Ltd

PRIVACY NOTICE

At Webull, we want you to have a great experience using our services. An important part of your experience is trusting that the personal and financial information we collect about you is protected. We are committed to maintaining the confidentiality and integrity of your personal information and have implemented business procedures that are consistent with this Privacy Notice ("Notice") and comply with applicable law.

This Notice describes how Webull Securities and its affiliates (collectively "Webull," "we," "us," or "our") process the information we collect about you through our websites, mobile apps, services, and when you otherwise interact with us (the "Services"), starting when you take steps to apply for a Webull account ("Account"). We have the utmost respect for your data privacy, so this Notice also explains steps you can take to control and protect your personal information on our Services. You agree to this Notice by accessing or using our Services. If you do not agree, you may not access or use the Services. Please note that all information provided by you is provided voluntarily. However, if you do not provide the information requested you may not be able to access or fully use the Services. The websites and mobile apps that you use to interact with us are owned and operated by our affiliates, and their use may have additional privacy guidelines. We will follow those additional guidelines as well as this Notice in protecting your privacy. If you have any questions about this Notice, please contact us (see HOW TO CONTACT US below).

Webull Securities South Africa (Pty) Ltd ("Webull SA", or "the FSP") acts as an intermediary for Webull Securities (Australia) Pty. Ltd. ("Webull AU"), which is authorised and regulated as a broker-dealer with the Australian Securities and Investments Commission ("ASIC") under license number 536980. As such, your principal relationship is with Webull AU. Webull SA may act as an intermediary for other local or foreign product suppliers as may be notified to you from time to time via the Webull SA app or website. To the extent that your Personal Information is processed in South Africa, this Privacy Notice is intended to comply with the Protection of Personal Information Act, 2013 ("POPIA"). Webull SA acts as a "Responsible Party" as defined in POPIA and processes Personal Information in accordance with the conditions for lawful processing set out in that Act.

If you are under the age of 18, you cannot use our Services. We do not knowingly collect, maintain, or sell information from minors under 18.

This Notice will help you understand the following:

1. **THE INFORMATION WE COLLECT**
2. **HOW WE USE AND SHARE YOUR INFORMATION**
3. **COOKIES**
4. **ANALYTICS, TRACKING AND ONLINE ADVERTISING**
5. **HOW WE PROTECT YOUR INFORMATION**
6. **MANAGING YOUR INFORMATION**
7. **TRANSFER OF YOUR INFORMATION**
8. **THIRD PARTY SITES**
9. **CHANGES TO THIS NOTICE**
10. **HOW TO CONTACT US**

Webull Securities South Africa (Pty) Ltd, authorised and regulated by the Financial Sector Conduct Authority (in South Africa) as an authorised financial services provider (FSP No 50863).

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1. THE INFORMATION WE COLLECT

In the course of providing the Services, Webull collects or receives the following types of information, which includes personal information/data.

Data Source	Types of Data
From you	• Identity data such as full name, date of birth, nationality identification number (e.g., social security number, passport number), nationality/citizenship. • Biometric data such as photograph, voice, and video recordings of you, including our conversations with you. • Contact data such as email, phone number, mailing/home address information. • Financial data such as bank account and payment card details, suitability information, personal income, account balance, credit scores and tax information. • Content such as photos and contacts in your mobile device or email (collected with your consent). • Profile data such as username and password, purchases or orders, knowledge assessments, interests, preferences feedback, survey responses, and inferences regarding characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities, and aptitudes. • Other information such as information submitted via focus groups, contests, sweepstakes, job applications, customer support and/or other interactions with us.
Automatically collected through the Services	• Usage information such as device identifiers, the identifier for advertisers ("IDFA"), operating system and version, carrier and network type, internet protocol addresses ("IP address"), browser type and language, referring and exit pages and uniform resource locators (date and time, amount of time spent on particular pages), what features of the Services you use or visit, purchases, and similar information regarding your use of the Services.
	• Geolocation data from your mobile device, wireless carrier, or third-party service providers; you may control the collection of precise geolocation data through the user settings on your device.
	• Activity data, such as purchases/sales, amount, type of transaction, time and data, and similar activity through the Services.
	• Tracking data collected using first and third-party cookies, pixels, web server logs, web beacons, and similar data collection and tracking technologies, such as IP address, browser, type, internet service provider ("ISP"), platform type, device type.
Other sources	• Service providers and partners, such as fraud risk assessments and protection, identify verification, credit records, payment

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	processing information, ad campaign information (e.g., the ads you click on), and data from other users (e.g., you appear in a contact list provided to us). • Social media and connected services, such as information from your interactions with our social media platforms, the Webull Community, and from services that you connect with Webull, such as when you link, connect, or log into your Account through social media, Google, or Apple. • Third-party analytics services, such as demographic data, mobile and internet usage, analyses of performance metrics, reports regarding your activity and use of the Services. • Publicly available data, such as contact information, public records, and information you have designated as publicly available on other sites.

2. HOW WE USE AND SHARE YOUR INFORMATION

We process Personal Information only where there is a lawful basis to do so. In terms of POPIA, such lawful bases include your consent, the performance of a contract to which you are a party, compliance with a legal or regulatory obligation, the protection of a legitimate interest of Webull, you, or a third party, or where processing is otherwise permitted by law.

We will use and process your information for the following purposes:

- onboard you as a customer, including identity verification, credit or anti-money laundering checks, or other due diligence efforts;
- provide and personalize the Services for you;
- communicate with you regarding your Account;
- monitor, support, analyse and improve the Services;
- conduct marketing and advertising programs, provided that, where required under applicable law, we will obtain your prior opt-in consent to send electronic marketing communications;
- service, maintain, and protect your Account;
- process transactions in your Account;
- respond to inquiries from you;
- newsletters, product announcements, surveys;
- develop, offer, and deliver new products and Services;
- facilitate contests, sweepstakes, and promotions;
- protect the safety and security of our Services, business, and customers;
- fulfill legal and regulatory requirements;
- protect or exercise our legal rights; and
- as otherwise permitted by applicable laws, or with your consent.

We make reasonable efforts to ensure that your personal information is sufficiently accurate, complete, and up to date. If the personal information that you have provided to us changes, please update by logging into your Account (see MANAGING YOUR INFORMATION section below) or by contacting us.

We may share your information with third parties as described below:

- vendors and service providers, such as securities clearinghouses, identification verification providers, that provide services at our direction, and are instructed to keep your personal information confidential and use it only to provide the services that we have specified;

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- business partners to administer our promotions, sweepstakes, surveys, and other programs, and deliver targeted advertising;
- as part of the sale or other transfer of our business;
- any person or institution with which you have or propose to have dealings, such as companies whose securities you purchase using the Services;
- our affiliates, including those in jurisdictions other than Australia or South Africa when doing so will allow us to more effectively provide the Services to you;
- as required by applicable law or legal process;
- report suspicious transactions or assist law enforcement with an investigation;
- protect the rights, interest, safety, and security of Webull, our customers, or the public;
- other third parties, provided that you request or authorize the disclosure, such as implementing, administering, or enforcing a transaction; and
- as otherwise permitted by applicable law, or with your consent.

We may aggregate or otherwise de-identify your personal information so that it does not reasonably identify you and share such information with third parties.

3. BIOMETRIC DATA PROCESSING

We collect and process biometric data solely for legitimate and defined purposes. The biometric information we collect includes,

Identification data: Full name, ID/passport number, date of birth, nationality, residential address.
Contact data: Phone number, email address.
Financial data: Bank account details, source of funds, tax information.
Biometric data:
Facial images (e.g., ID selfies, video liveness checks).
Voice recordings (e.g., client service interactions).
Video recordings (e.g., onboarding, possibly customer support calls).
Device and usage data: IP address, device ID, and app usage metrics for fraud prevention and platform optimization.

We process biometric data only:
- With your explicit, informed, and voluntary consent, or
- As authorised by law, or
- Where necessary in order to fulfil our product offering performance or in fulfilling a legal obligation.

This data is collected directly from you during your use of our services or when you interact with our platform.

We collect and use biometric data for the following purposes:
- Identity verification for secure access to our digital platforms
- Customer authentication for fraud prevention and secure service delivery
- Compliance with legal and regulatory obligations

Biometric data will not be used for profiling, marketing, or any unrelated purpose.

Access to biometric data is strictly limited to internal authorised personnel, third party service providers and Webull Group entities (South Africa, Singapore, United Kingdom and Australia) who require it for the specific operational and regulatory purposes outlined above. Biometric data is stored on secure servers located in Australia and South Africa, in compliance with relevant data protection regulations.

Where data is hosted or backed up using cloud infrastructure, we ensure that such infrastructure is located in countries that offer an adequate level of protection in accordance with Section 72 of the POPI Act. Alternatively, standard contractual clauses or binding corporate rules are used to ensure adequate protection in line with POPIA requirements

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Biometric data will be retained only for as long as necessary to fulfil the purpose for which it was collected, if required to comply with applicable legislation or contractual obligations or if needed to establish, exercise, or defend a legal claim

Once the retention period has expired or the data is no longer needed, it will be securely deleted or de-identified. In accordance with the POPI Act, you have the right to, request access to the biometric data we hold about you, request the correction or deletion of your biometric data and object to the processing of biometric data (where permitted by law).

4. COOKIES

Our website may use cookies and similar tracking technology to automatically collect and receive certain technical and usage information such as IP address, browser, ISP, and device type when you connect with our Services.

Cookies are small packets of data that a website stores on your hard drive so that your device will remember information about your visit. The data collected through cookies and similar tracking technology enables us to personalize your experience with the Services, understand how you use them, maintain a persistent session, improve, and further develop the Services, and measure and optimize advertising and promotional effectiveness.

We may use session cookies (which expire once you close your web browser), and persistent cookies (which stay on your computer until you delete them). Most browsers and mobile devices allow you to manage cookies in their settings.

If you refuse a cookie, or if you delete cookies from your device, you may lose functionality and/or experience some inconvenience in your use of our Services. For example, you may not be able to sign in and access your Account as quickly, or we may not be able to recognize you, your device, or your online preferences. Furthermore, if you use a different device, change browsers, or delete the opt-out cookies that contain your preferences, you may need to perform the opt-out task again. For more information, see MANAGING YOUR INFORMATION.

5. ANALYTICS, TRACKING AND ONLINE ADVERTISING

Webull uses third-party advertising and analytics services (e.g., Google Analytics) to better understand your online activity and to provide you with content that is relevant to your interests and preferences. These services collect information about your use of our Services and other websites and online services over time through cookies and other tracking technologies.

The data collected may include your IP address, web browser, mobile network, pages viewed, time spent, links clicked, and conversion information. We and our third-party partners use this information to, among other things, analyse and track data, determine the popularity of content, and deliver targeted advertisements on our Services and other platforms.

Analytics companies may also provide advertising-related services to us such as reporting, attribution, analytics, and market research. By accessing and using the Services, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Notice. For more information on Google Analytics, including how to opt out from certain data collection, please visit https://support.google.com/analytics/answer/6004245

For more information about interest-based ads, including to learn about options for opting out of having your web browsing information used for targeted advertising purposes, please visit www.aboutads.info/choices. You should also review your mobile device settings and controls for features that allow you to opt out or opt in to having certain information collected for behavioural advertising purposes. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Services. Webull does not advertise on behalf of specific securities or investment options on our Services.

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6. HOW WE PROTECT YOUR INFORMATION

Webull uses reasonable, industry standard security measures to protect information under our control from loss, misuse, unauthorized access, disclosure, alteration, and destruction.

We maintain appropriate physical, electronic, and procedural safeguards, including restricting access to personal information on a need-to-know basis, and limiting the amount and type of information available for downloading or transmittal. We also regularly conduct audits to ensure the effectiveness of our system.

We must stress however, that no security system is impenetrable. We cannot guarantee that our security measures will prevent hackers from illegally obtaining this information, or that our database and/or systems will not be subject to a cyber-attack. In the event of a security compromise that is reasonably likely to result in the unlawful access to or acquisition of Personal Information, Webull will notify affected data subjects and the Information Regulator where required by POPIA, taking into account the nature of the compromise and any measures implemented to address it.

Webull retains your personal information for as long as necessary to accomplish the purpose for which it was collected, to meet our legal and regulatory obligations including compliance with our records retention practices, and as permitted to meet our legitimate interests.

7. MANAGING YOUR INFORMATION

There are several ways for you to manage the information collected and processed by Webull, including the following:

Access and change your information. If you have an Account, you may request to access, review, delete and make changes to your information by using our Services or by contacting us. You may also request that we rectify any Personal Information that is inaccurate, incomplete, misleading, or out of date. Subject to applicable laws, including the Protection of Personal Information Act, 2013 ("POPIA") and the Promotion of Access to Information Act, 2000 ("PAIA"), we will use commercially reasonable efforts to process such requests in a timely manner. Where a request for access to information is made in terms of PAIA, you may be required to follow the formal PAIA request process as set out in our PAIA Manual. Please note that it is not always possible to completely remove or modify information in our systems where retention is required by law or for legitimate business purposes, in which case we will provide you with the reasons why the modification or removal was not possible.

Withdraw the consent. If you have an Account, you may withdraw your consent to our processing of your personal information at any time by contacting us (see HOW TO CONTACT US below). If you withdraw your consent to any or all use, collection, disclosure, transfer and/or processing of your personal information or do not consent to the collection of your personal information by us, we may not be able to provide or continue providing you with all features or aspects of our existing Services. Please note that withdrawing consent does not affect our right to collect, use, transfer, process and disclose personal information where such collection, usage and disclosure without consent is permitted or required under applicable laws in any jurisdiction. Where processing of personal information is on the basis of legitimate interests you have the right to object to such processing, subject to applicable laws. You also have the right to object to processing of personal information for purposes of direct marketing.

Delete your account and/or your personal information. You may delete your Account at any time through the Webull app (Settings > Account & Security > Delete Account), and your personal information will be deleted in the normal course of business pursuant to our current data retention practices. You may also request to have all your personal information deleted by contacting us. We will comply with deletion requests within a reasonable time to the extent permissible by law; however, we will not delete data that we are legally required to maintain, such as information regulators require for audit or substantiation purposes.

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Limit access to your device data. You may disconnect our mobile app's access to certain stored device information through your device's settings. For instance, you can withdraw permission for the app to access your contact list or photo gallery.

Manage communications preferences. You can opt to stop receiving promotional emails from us by clicking the "unsubscribe" link in those emails. We may still send you service-related or other non-promotional communications, such as Account notifications, receipts, security notices and other transactional or relationship messages.

Limit mobile ad tracking. You may set your mobile device to limit ad tracking, in which case we will not be able to see your advertising ID or IDFA. However, we will still share other personal information with our advertising partners as described in this Notice.

Disabling certain data sharing. You can limit how we share your data with our marketing partners to market our Services more effectively to you across sites and apps by contacting us. When disabled, we will no longer share personal information with these partners for these purposes.

Posting information. Posting personal information in the Webull Community or other public areas will make it publicly available. The personal information you post or share with others may in turn be shared by them with still other users and it may also show up when someone uses a public search engine (even if that person is not a user of our Services). **Do not post personal information in public areas of our Services that you want to keep private**.

Lodge a complaint with the regulatory authority. You have the right to lodge a complaint in relation to the processing of your personal information with the relevant supervisory / regulatory authority. Where the processing of personal information falls under the ambit of South Africa's Protection of Personal Information Act, 2013, data subjects have the right to lodge a complaint with the **Information Regulator** in South Africa, the contact details of which are as follows:

Woodmead North Office Park
54 Maxwell Drive Woodmead
Johannesburg
South Africa
2191
Email address: POPIAComplaints@inforegulator.org.za

8. TRANSFER OF YOUR INFORMATION

Our Services are hosted in Australia, and your information is stored in Australia in the cloud.

By using our Services you agree to have your data transferred to and processed by our affiliates in jurisdictions outside of South Africa, including but not limited to Australia, the United Kingdom and Singapore. We ensure these regions either have equivalent privacy laws in place to the South African POPIA or provide appropriate safeguards that are deemed valid and align with the POPIA.

In providing our Services and fulfilling your requests, we may share your personal information with relevant product suppliers. This sharing is done solely for the purpose of fulfilling your orders, managing warranties, delivering goods or services, or providing customer support related to the products. These suppliers are bound by agreements that require them to use your personal information only for the specified purposes and protect the confidentiality and integrity of the information in accordance with the applicable laws and regulations. Where suppliers are located outside South Africa, we ensure that the jurisdiction provides an adequate level of protections and has appropriate safeguards as required by the applicable law and regulations.

Webull will not transfer any personal information relating to a natural person (and juristic person, where applicable) located in the European Economic Area, the United Kingdom, South Africa, or any other jurisdiction

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that restricts outbound data transfer, from the country of origin without appropriate safeguards as required by applicable law and regulations. You may receive a copy of those safeguards by contacting us (see HOW TO CONTACT US below).

9. THIRD PARTY SITES

This Privacy Notice does not apply to the privacy practices of companies that we do not own or control, such as companies that advertise on our Services or with whom we partner for certain services. We are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

10. CHANGES TO THIS NOTICE

We may update or revise this Notice at any time with or without notice to you. We will post the latest version of this Notice on our website at www.webull.co.za

Your continued use of our Services is deemed your consent to the revised version.

11. HOW TO CONTACT US

If you have any questions, comments, or suggestions about this Notice or your personal information, please contact us by way of the following:

- E-mail Client Services at support@webull.co.za
- Telephone +27 10 288 4000
- Website www.webull.co.za

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