

## **1. Who we are and the purpose of this Statement**

The Sabvest Group is committed to protecting your privacy and we will only use your personal information in accordance with this Statement and applicable data protection legislation.

This Statement sets out how your personal information will be used by the Sabvest Group and applies to any information, including personal and special personal information, you give to the Sabvest Group or which the Sabvest Group may collect from third parties as well as the Sabvest website.

Any reference to “Sabvest”, “the Sabvest Group” or “we” refers to one or more of the entities, affiliates or subsidiaries of the Sabvest Capital Limited group.

We have implemented reasonable technical and operational measures to keep your personal information secure however it is important that you take all necessary and appropriate steps to protect your personal information yourself as well (for example, by ensuring that all passwords and access codes are kept secure). Sabvest cannot be held liable in this regard.

## **2. How we collect information**

We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either:

- when you interact with us electronically by way of our website, apps, emails, or social media channels, which may include the collection of metadata (data about data); or
- Where relevant, from third-party sources, such as other entities within the Sabvest Group, public databases, securities regulators, CSDPs, data aggregators, other financial institutions, appointed agents or other regulators.

## **3. What information we collect**

We may collect the following information about our stakeholders or users:

- your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information;
- records of correspondence or enquiries from you or anyone acting on your behalf;
- details of transactions you carry out or interactions you have with us;
- details of contracts, sales or leases you carry out with us;
- sensitive or special categories of personal information, including biometric information, such as images, fingerprints and voiceprints.

Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. We will process their personal information in accordance with this Statement.

You may refuse to provide us with your personal information in which case we may not be able to provide you with a relevant service or would have to terminate our business relationship. The supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory.

#### **4. How we use your information**

We may use, transfer and disclose your personal information for the purposes of:

- providing you with the assistance you have requested, or considering your application to provide services and products to us and notifying you about important changes to these services, products or offerings;
- managing your account or relationship and complying with your instructions or requests;
- detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
- assessing and dealing with complaints and requests;
- operational, marketing, auditing, legal and record keeping requirements;
- verifying your identity or the identify of your beneficial owner;
- transferring or processing your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use of any of

our website;

- complying with applicable laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
- disclosing your personal information to third parties for reasons set out in this Statement or where it is not unlawful to do so;
- monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from the Sabvest Group or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and the Sabvest Group;
- improving or evaluating the effectiveness of the Sabvest Group business, services or offerings; and
- prevention and control of any disease.

Please note that the Sabvest Group will not be responsible for any loss, damage or injury that you may incur as a result of any unintentional disclosures of your personal information to unauthorised persons or the provision of incorrect or incomplete personal information to the Sabvest Group.

## **5. Sharing your information**

Your personal information may be shared with the Sabvest Group affiliates, our agents and sub-contractors, and selected third parties who process the information on our behalf.

We may also disclose your personal information to third parties in the following circumstances:

- to any other of the Sabvest Group's affiliates, business partners or other third parties to –
  - assess and monitor your interactions with us in respect of products or services;
  - determine which products and services required by or offered by Sabvest Group may be of interest to you and/or to send you information/requests about such products and services, unless you object or choose not to receive such communications;
  - have a better understanding of your circumstances and capability to provide

and improve offerings to you;

- to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime;
- to any regulator or supervisory authority, including those in foreign jurisdictions, if Sabvest Group is required to do so in terms of applicable laws;
- to a prospective investor, buyer or seller of any of our businesses or assets;
- to any person if we are under a duty to disclose or share your personal information in order to comply with any applicable laws, or to protect the rights, property or safety of Sabvest Group, other clients or other third parties; and/or
- to your agent or any other person acting on your behalf, or an introducer.

We may transfer your information to another of Sabvest Group' affiliates, an agent, sub-contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of South Africa. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the same level of protection as if we were dealing with it.

If you do not wish us to disclose this information to third parties, please contact us at the contact details set out below. We may, however, not be able to provide services to you if such disclosure is necessary.

We may retain your personal information indefinitely, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of applicable laws. However, as a general rule, we will retain your information in accordance with retention periods set out in applicable laws, unless we need to retain it for longer for a lawful purpose. (For example, for the purposes of complaints handling, legal processes and proceedings.)

## **6. Access to, correction and deletion of your personal information**

You may request details of personal information which we hold about you under the Promotion of Access to Information Act, 2000 ("PAIA"). Fees to obtain a copy or a description of personal information held about you are prescribed in terms of PAIA. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal

information held by the Sabvest Group, please review our PAIA Manual located at [www.sabvestcapital.com](http://www.sabvestcapital.com) and/or contact us via email on [ho@sabvest.com](mailto:ho@sabvest.com).

You may request the correction of personal information the Sabvest Group holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. Please note that you are responsible for informing the Sabvest Group if your information changes.

You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details set out above.

You have a right to object on reasonable grounds to the processing of your personal information where the processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such processing.

## **7. Complaints**

Should you believe that the Sabvest Group has utilised your personal information contrary to applicable laws, we ask that you undertake to first attempt to resolve any concerns with the Sabvest Group.

## **8. Updates**

This privacy statement was last updated on 30 June 2021. A notice will be posted on the Sabvest website home page whenever the Privacy Statement is materially changed. Please check the website regularly to ensure that you are aware of the latest version of this Privacy Statement.

## **9. Contact Us**

If you have any comments, questions, complaints or require personal information to be updated please contact the Sabvest Group via email at [ho@sabvest.com](mailto:ho@sabvest.com).

Our head office's registered address is 39 Rivonia Road, Commerce Square, Building 4, Sandton, JHB.

## **10. The Information Regulator**

Whereas we would appreciate the opportunity to first address any complaints regarding our processing of your personal information, you have the right to complain to the Information Regulator, whose contact details are:

The Information Regulator (South Africa) JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 P.O. Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

General enquiries email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)