

Perpetua Investment Managers

Privacy Policy

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1. Introduction

Perpetua Investment Managers (Pty) Limited (“Perpetua”) respects your right to privacy and is committed to keeping the information that you supply to Perpetua confidential.

Because we gather certain types of information about you, we feel you should fully understand our policy and the terms and conditions surrounding the capture and use of that information. This Privacy Policy sets forth the policies for the collection, use, storage, sharing, disclosure (collectively, “processing”) and protection of personal data relating to current, prospective and former investors in the Perpetua products.

This Privacy Policy is being provided in accordance with the requirements of the Protection of Personal Information Act, No.4 of 2013 (“POPIA”).

Our Information Officer is Logan Govender who is contactable via logan@perpetua.co.za

We have registered our Information Officer with the Information Regulator. We are a deemed Responsible Party under POPIA and operate under registration number 2006/014297/07.

Please read our detailed privacy policy below to learn more about how we process your personal data. This privacy notice aims at providing in brief some information about why we collect, use and store your data.

2. What personal information is collected?

The categories of personal data we may collect include names, email address, residential address, date of birth, telephone number, signature, nationality, tax number, copies of identity documents, bank account details, source of funds or other sensitive information required to conduct business. We may also collect details about your visits to our website for marketing stats and in order to improve our services.

3. How we collect personal information

We collect information about individuals in variety of ways including but not limited to:

- a. Information provided directly from you or another person on your behalf
- b. Information obtained from transactions between you and Perpetua
- c. Information obtained from third parties, publicly accessible databases, governmental agencies or other publicly accessible sources.

We use the information primarily to provide you with a personalized experience that delivers the information, resources, and services that are most relevant and helpful to you.

4. How we use your personal information

Across our business practices we ensure that your data is processed fairly and lawfully. We make sure that your data is processed for the purposes it was originally collected, kept up to date, relevant and not excessive, not kept longer than necessary and kept secure by adopting best industry practices. We require your personal data in order for us to:

- a. provide services as requested by you under the contract entered into with you
- b. communicate information about your investments (periodic statements, report backs)
- c. comply with regulatory and legal requirements (AML, KYC, fraud prevention)
- d. comply with audit requests
- e. carry out other business activities in the legitimate interest of Perpetua where your rights to privacy do not override our business interest such as for the purpose of direct marketing.

Your personal information will be processed in accordance with the requirements of POPIA. We do not share with others any of the information you provide, unless we say so in this Privacy Policy, or when we believe in good faith that the law requires it.

5. How we may share your personal data

Perpetua does not sell, rent or trade your personal information. Perpetua will disclose your personal information in the following instances:

- a. specifically agreed with you
- b. required by a court order
- c. required by regulatory authority (Financial Sector Conduct Authority)
- d. in order to comply with legal and regulatory obligations (KYC, AML, fraud prevention)
- e. in the ordinary course of business to the relevant fund administrator, broker, custodian (or other third party processors contracted to Perpetua) in order to facilitate transactions
- f. the information is already publicly available

6. Who has access to the personal information?

Perpetua will not sell, rent, or lease mailing lists or other customer data to others, and we will not make your personal information available to any unaffiliated parties, except our approved agents, suppliers and contractors, or as otherwise described in this Privacy Policy.

7. How is your personal information protected?

As a responsible FSP authorised and regulated by the FSCA, we ensure our business practices and data processing activities are in compliance with the regulations and our data processing staff well-trained in processing your information. Our partners and third-party processors are all bound by strict data protection obligations through data processing contracts. Furthermore, we have adopted sound technical and compliance procedures to avoid loss, destruction, unauthorised access or omission to your data.

8. Record retention

Perpetua will not retain personal data for longer than is necessary in relation to the purpose for which it is collected, subject to the requirements of POPIA and other relevant legislation.

Information may be retained only to serve the purpose of collecting the information and will be deleted/destroyed (to the extent technically practicable) once the purpose has been fulfilled, subject to other regulatory requirements where Information is to be kept for a specific prescribed period.

Information and records of a personal nature of Clients and/or Employees will be stored for a period of 5 years before being deleted/destroyed (to the extent technically practicable).

9. Your Rights

Perpetua respects your right to privacy and all other rights as set forth in the data protection law. If we process data about you, you have the right to request or access information we hold about you. In order to access your information you may reach out in the following ways:

Email: clients@perpetua.co.za

Website: www.perpetua.co.za

Where your data is shared with a third-party, we shall contact them for deletion.

10. Complaints

If you have any queries with regards to how we handle your information, require access to your personal information or in case you have complaints, please write to our Information Security Team at

clients@perpetua.co.za

Details of the Regulator

The Information Regulator (South Africa)

33 Hoofd Street

Forum III, 3rd Floor Braampark

P.O Box 31533

Braamfontein, Johannesburg, 2017

Mr Marks Thibela

Chief Executive Officer

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Complaints email: complaints.IR@justice.gov.za

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