

CUSTOMER PRIVACY POLICY

A. INTRODUCTION

The purpose of this policy is to explain how we obtain, use and disclose personal information, as is required by the Protection of Personal Information Act, 4 of 2013 (“PPI”).

At Protea Capital Management we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

This policy sets out:

- What information we collect;
- How we use your information;
- To whom we disclose your information;
- How we safeguard your information;
- Your rights to access and correction of information;
- Changes to this policy; and
- How to contact us.

B. THE INFORMATION WE COLLECT

We collect and process your personal information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

Customer Privacy Policy

Should we require your personal details, for example when you purchase a product from us or when you submit enquiries to us or contact us, we will ensure that such information is collected directly from you or your appointed intermediary. Where possible, we will inform you what information you are required to provide to us and what information is optional.

Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information. Your IP address details may be captured for administrative and demographic research purposes.

Hyperlinks included on our website to other locations or websites on the internet, outside the company, are for information purposes only and Protea Capital Management will not be responsible for the content and privacy policies of any externally linked websites or webpages.

C. HOW WE USE YOUR INFORMATION

Your personal information will only be used for the purpose for which it was collected, or as otherwise agreed with you, for example:

- To provide our products or services to you, to carry out a transaction you requested or to maintain our relationship;
- To confirm and verify your identity or to verify that you are an authorized user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;
- To conduct administrative and demographic research;
- For audit and record keeping purposes; or
- In connection with legal proceedings.

We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law (for example to protect Protea Capital Management’s interests).

D. DISCLOSURE OF INFORMATION

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

Customer Privacy Policy

We may share your personal information with, and obtain information about you from:

- Third parties for the purposes listed above, for example credit references, fraud prevention agencies and law enforcement agencies; or
- Other third parties from whom you have chosen to receive marketing information.

We may also disclose your information:

- Where we have a duty or a right to disclose information in terms of law or industry codes; or
- Where we believe it is necessary to protect our rights.

E. INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access to and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

When we contract with third parties, we review their security, privacy and confidentiality measures to ensure that personal information that we remain responsible for, is kept secure.

We may need to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

F. YOUR RIGHTS: ACCESS TO INFORMATION

You have the right to request a copy of your personal information that we hold on record. To do this, contact us at the address or telephone number listed below and specify what information you would like to receive. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Subject to our record-keeping obligations in terms of law, you have the right to contact us at the address or telephone number listed below, and request that your personal information we hold on record be removed from our data basis.

Customer Privacy Policy

Please note that any such access request may be subject to payment of a legally allowable fee.

G. CORRECTION OF YOUR INFORMATION

Should any of your personal information change, please contact us at the address or telephone number listed below in order to update, correct or delete your personal information.

We will take all reasonable steps to confirm your identity before making any changes to your personal information.

H. CHANGES TO THIS POLICY

Please note that this policy may be reviewed and amended from time to time.

I. HOW TO CONTACT US

If you have any questions about this policy or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the following address or telephone number:

Protea Capital Management Proprietary Limited

7 Northridge Avenue
Sunnyridge, Germiston
Gauteng
1401
Tel.: +11 822 2154

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