

PRIVACY POLICY

1. *What Personal Information does the Company require?*

1.1. Balondolozhi Investment Services (“Balondolozhi”) has a Personal Information Protection Policy in place, which governs the Processing of your Personal Information. You may view the Personal Information Protection Policy by contacting the Information Officer on the following email address: nobuhle@balondolozhi.co.za or on the following telephone number: 011 484 9023.

1.2. “Personal Information” is defined in the Protection of Personal Information Act (Act no. 4 of 2013) (“POPIA”) as follows:

“Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;

- (b) information relating to the education or the medical, financial, criminal, or the employment history of the person;
- (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (d) the biometric information of the person;
- (e) the personal opinions, views or preferences of the person;
- (f) correspondence sent by the person, that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- (g) the views or opinions of another individual about the person; and
- (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.”

1.3. “Processing” is defined in POPIA as follows:

“any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—

- (a) the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- (a) dissemination by means of transmission, distribution or making available in any form; or
- (b) merging, linking, as well as restriction, degradation, erasure or destruction of information;”

1.4 Balondolozzi is a Responsible Party in respect of the Personal Information provided by Clients (Data Subjects). Balondolozzi processes the following types of Personal Information collected from Clients:

- 1.4.1. Identification document;
- 1.4.2. Proof of residential/business operating address;
- 1.4.3. South African Income Tax registration number;
- 1.4.4. South African VAT registration number (if applicable per individual/legal entity);
- 1.4.5. Contact numbers;
- 1.4.6. E-mail addresses; and
- 1.4.7. Banking details.

2. Why does Balondolozzi require your Personal Information?

2.1. This Personal Information is required in terms of the Financial Intelligence Centre Act, 38 of 2001 and Balondolozzi’s Risk Management and Compliance Programme. The said Personal Information forms part of Balondolozzi’s requirements when obtaining a discretionary mandate from Clients or opening an account to facilitate the relevant business activities.

2.2 Balondolozzi needs your Personal Information to provide you with the following services:

- 2.2.1. To establish a legal relationship with you;
- 2.2.2 To populate the Client account information required on the various on-boarding platforms to open your account; and
- 2.2.3. To generate statements and capture contact information related to this discretionary mandate or account.

3. How is your Personal Information Processed?

- 3.1. Your Personal Information is Processed at 1st Floor Building 1, Glenhove Square, 71 4th Street, Houghton Estate, 2198. Client Personal Information is stored at an offsite data centre.
- 3.2. No third-party providers have direct access to your Personal Information unless specifically required by law and to satisfy client due diligence principles.
- 3.3. Client Personal Information is shared with the custodian, for account opening purposes.

4. How long does the Company keep your Personal Information?

In terms of South African law and the Company’s Data Retention Schedule, Balondolozzi is required to keep your Personal Information for a five (5) year period following the date of termination of the business relationship. After this period, your Personal Information will be irreversibly destroyed. For more information on Balondolozzi’s Data Retention Schedule, please refer to our Data Retention Schedule which can be accessed by contacting the Information Officer.

5. What are your rights?

5.1. Should you believe that any of your Personal Information held by Balondolozzi is incorrect or incomplete, you have the right to request to view this



information, rectify it or have it deleted. Please contact the Company's Information Officer on the following email address: nobuhle@balondoloji.co.za, should this be required.

5.2. In addition, if you wish to complain about how Balondoloji has handled your Personal Information, please contact the Information Officer at this email address: nobuhle@balondoloji.co.za. Balondoloji's Compliance Department will investigate your complaint and contact you within two (2) business days of the complaint being lodged and work with you to resolve the matter.

5.3. If your query relating to your Personal Information is not, in your opinion, adequately dealt with, you can contact the Information Regulator on 012 406 4818 or infoereg@justice.gov.za to file an official complaint.