Definitive

Privacy Notice

1. What Personal Information does the Company require?

1.1. Definitive Capital Management (Pty) Limited ("the Company")'s Personal Information Protection Policy governs the Processing of your Personal Information. You may view the Personal Information Protection Policy by contacting the Information Officer on compliance@definitivecm.com or on 021 674 4167.

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, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

(b) dissemination by means of transmission, distribution or making available in any form; or

(c) merging, linking, as well as restriction, degradation, erasure or destruction of i information;”

1.4. The Company is a Responsible Party in respect of the Personal Information you (Data Subject) provide to the Company. The Company processes the following types of Personal Information from you:

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;

1.4.7. Banking details.

2. Why does the Company require your Personal Information?

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

2.2. The Company 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 Definitive Capital Management (Pty) Ltd, Bank Vontobel AG, VP Bank (Schweiz) AG, FNB Securities (Pty) Ltd, Momentum, Glacier by Sanlam, Ashburton Investments and AIMS.

Storage of your Personal Information takes place at Definitive Capital Management, The Oval, Ground Floor, Fernwood House, 1 Oakdale Road, Newlands, 7700, Cape Town and Metrofile, Boquinar Industrial Area, 7550, Cape Town.

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. Your Personal Information is shared with the Bank Vontobel AG, VP Bank (Schweiz) AG, FNB Securities (Pty) Ltd, Momentum, Glacier by Sanlam, Ashburton Investments and AIMS for account opening purposes.

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

4.1. Under South African law, the Company is required to keep your Personal Information for a five (5) year period following the date of termination of the business relationship according to the Company's Personal Information Retention Policy. After this period, your Personal Information will be irreversibly destroyed. For more information on the Company's Personal Information retention schedule, please refer to our Personal Information Retention Policy which can be requested at compliance@definitivecm.com or on the Company website, www.definitivecm.com.

5. What are your rights?

5.1. Should you believe that any of your Personal Information held by the Company 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 compliance@definitivecm.com should this be required.

5.2. In addition, if you wish to complain about how the Company has handled your Personal Information, please contact the Information Officer on compliance@definitivecm.com. The

Company'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 inforeg@justice.gov.za to file an official complaint.