

PRIVACY POLICY

for

THEKVEST GROUP (PTY) LTD

in terms of

THE PROTECTION OF PERSONAL INFORMATION ACT

1. OVERVIEW

Thekvest Group is an investment and management consulting company that participates and operates in strategic sectors of the economy to ensure growth and economic inclusion in South Africa.

Given the nature of our business, we are necessarily involved in the collection and processing of personal information.

Ensuring data privacy and the protection of your personal information is important to us. In the event that we use your personal information, we are committed to ensuring that such use is lawful, reasonable and pursuant to the purpose of our business engagements with you, as prescribed by the Protection of Personal Information Act.

This policy sets out what personal information we collect from you when you make use of our services, how we collect your personal information, the purpose for collecting such personal information, and how we use your personal information.

2. WHAT IS PERSONAL INFORMATION AND WHY DO WE COLLECT YOUR PERSONAL INFORMATION

Personal information refers to information relating to an identifiable person (including individuals and organisations). This includes information about your name, contact details, including your phone number and email, address, business information and relevant financial information.

We collect your personal information in order to provide, maintain and improve the performance of our services. This includes collecting information to:

- Establish and verify your identity and business operations, including those processes which may be required from us by law or good industry practice;
- Perform the services that you request of us;
- Accomplish any further purpose that is related to providing our services;

- Communicate with you in the manner in which you prefer, including via email, post, SMS or telephonically;
- Maintain and update our database of clients;
- Update and inform you about our services and any changes to our services;
- Recruitment and related activities;
- To conduct market or client satisfaction research or for statistical analysis;
- For auditing or record keeping purposes;
- Fulfil any contractual or legal obligation that we may have to you or a third party;
- Comply with any law or regulation or legal request from a recognised Authority; and
- Any other activity which may be lawful, reasonable and necessary to our business activities.

3. HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect your information in the four ways.

First, we collect your personal information directly from you or your representatives. We may collect information through electronic communication, telephonically, during meetings, through related documentation and in general interactions with you or your representatives.

Secondly, we collect your personal information from your electronic profiles, including your website and social media platforms. Information received from your online profiles are generally used for general informational purposes and to obtain the information necessary to understand your business, activities and vision.

Thirdly, we collect your personal information from our affiliates and third-party service providers. This information is used for general informational purposes and to supplement information which you have already provided or agreed to provide.

Lastly, we may collect your personal information through IT and electronic networks to determine who is visiting and using our website and other online platforms.

4. HOW LONG WILL WE KEEP YOUR INFORMATION

We may retain your personal information for as long as we continue to provide services to you and for five years thereafter. For purposes of this section, our services will be regarded as being terminated if you no longer access our services for a consecutive period of two years or if our services are expressly terminated.

We may further retain your personal information for a longer period of time if:

- We are required by law or regulation to do so;
- We are required by a contractual obligation with you to do so or you expressly request us to retain such information for a longer period; or
- We are required to keep your personal information for a legitimate purpose related to our services.

5. DISCLOSING YOUR PERSONAL INFORMATION

We will not disclose your personal information unless it is for purposes as set out in this policy or if we have received your permission to do so. We will disclose your personal information:

- To our employees, contractors and agents to the extent that these parties need your personal information in order for us to provide services to you;
- To our affiliates;
- To authorities or governmental agencies in order to comply with any law, regulation or legal process; or
- In order to protect our rights, property or safety or those of our employees, contractors, agents, clients or any other third party.

6. INFORMATION SECURITY

We take care to ensure that your personal information is adequately protected against unauthorised access and use and remains secure.

We may store your personal information at a physical location or by electronic means, including on a cloud-based system. We will take reasonable, appropriate and generally accepted measures to ensure that your personal information is protected against unauthorised and unlawful processing, accidental loss, destruction or damage.

However, we cannot guarantee that the transmission of your personal information, particularly when transmitted electronically, is absolutely secure.

In order to protect your personal information, we undertake to regularly review our security controls and implement appropriate and generally accepted technical and organisational measures to ensure such protection as far as reasonably possible.

We further impose necessary security, privacy and confidentiality obligations on those third parties that we have a contractual relationship with to ensure, as far as reasonably possible, that your personal information remains secure. We also ensure that such third parties agree to treat your personal information with the same standard of care as we are obliged to do.

7. YOUR RIGHTS

You have the following rights as they relate to the collection and processing of your personal information:

- **Access to information:** you have the right to request a copy of the personal information that we hold about you. A request for such information may be subject to an administrative fee permitted by law. We may also require a copy of your identity or registration documentation for verification purposes.
- **Right to the correction of information:** you have the right to request that we update or correct the personal information that we hold about you. We may also require a copy of your identity or registration documentation for verification purposes.

- **Right to the deletion of information:** under certain circumstances, you have the right to request that we delete the personal information that we hold about you. We may also require a copy of your identity or registration documentation for verification purposes.
- **Right to object:** you have the right to object to us processing the personal information that we hold about you if you have not consented to the processing, the processing is not necessary to perform our services, or if the consent is not related to a legal purpose or for the discharge of a legal obligation.
- **Right to lodge a complaint:** you have the right to complain if you are concerned about the way in which we collect or process the personal information that we hold about you.

8. CHANGES TO THIS POLICY

We may update this privacy policy at any time by publishing an updated version on our website. The updated policy will be published on our website. We encourage you to review this policy on a regular basis.