



ALUMA CAPITAL (PTY) LTD

PRIVACY POLICY STATEMENT

1. OUR COMMITMENT TO YOUR PRIVACY

Respecting and protecting your personal information is very important to Aluma Capital (Pty) Ltd (“Aluma Capital”, “we”, “us” or “our”), an authorised financial services provider, FSP 46449.

Your privacy is a right protected by the Constitution and by the Protection of Personal Information Act 4 of 2013 (“POPIA”). It is also simply good business practice, and we take it seriously.

This Privacy Policy explains what personal information we collect about you, why we collect it, who we share it with, how we protect it, and what rights you have. A plain-language summary of what “personal information” means is set out in section 2, and the full definition used in POPIA appears in the Annexure to this policy.

In line with the eight conditions for the lawful processing of personal information set out in POPIA, we undertake to:

- take responsibility and accountability for managing and protecting your personal information whenever we provide services and solutions to you;
- collect and process only the personal information that is necessary for the purpose of assisting you, concluding the related agreements, and meeting the legitimate legal interests of everyone concerned;
- collect your personal information directly from you wherever possible, and to collect it from another source only where POPIA permits us to do so – for example where you have consented, where the information is publicly available, or where collecting it from you would prejudice the purpose;
- use your personal information only for the purpose for which it was collected, or for a purpose compatible with it;
- not share or further process your personal information unless this is necessary to provide you with the service you have asked for, or unless the law requires or permits it;
- be open and transparent with you, and to notify you as and when the law requires about why and how your personal information is collected;
- safeguard and protect the personal information in our possession;
- confirm to you, free of charge, what personal information we hold about you, to correct or update it, and to keep it no longer than the law allows or requires; and
- respect your right to withdraw any consent you have given us, on the understanding that this will not affect the lawfulness of processing carried out before you withdrew it, and that we may still be required by law to keep and process certain information.

2. WHAT WE MEAN BY PERSONAL INFORMATION

Personal information is any information that can be used to identify you. It includes obvious things such as your name, identity number, address, email address and telephone number, and also information such as your financial position, your investments, your employment and education history, your banking details, and the opinions others hold about you.

Where you deal with us on behalf of a company, trust or other juristic person, personal information also includes information identifying that entity.

The full definition of personal information, as it appears in POPIA, is set out in the Annexure to this policy.

3. HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect most of your personal information directly from you – for example when you complete an application or mandate, when we conduct a financial needs analysis, when you contact us, or when you use our website.

In some cases we may also collect personal information about you from other sources, where POPIA allows this. These sources may include:

- product providers, administrators, custodians and other financial institutions involved in your investments;
- credit bureaux and identity verification services, where a check is required in order to provide the service you have requested or to comply with the law;
- public registers and publicly available sources;

- your authorised representative, adviser, employer or intermediary, where they act on your behalf; and regulatory and enforcement bodies, where we are required to obtain or verify information.

4. WHY WE PROCESS YOUR PERSONAL INFORMATION

We, and the service providers who assist us, may be required to collect, use or keep your personal information for reasons such as:

- to provide financial planning, intermediary and advisory services to you, and to recommend products and services that suit your needs;
- to administer and manage your investment portfolio, including under any discretionary mandate you have granted to us;
- to administer your interest in Aluma Capital's Private Equity fund products, where applicable;
- to carry out the transactions you have requested, and to maintain our relationship with you;
- to respond to your queries and to handle any complaint you may lodge;
- to confirm and verify your identity, or to verify that you are an authorised user, for security purposes;
- to conduct credit reference or verification checks, where you have authorised this or where it is necessary in order to provide the service you have requested;
- for operational purposes connected with the services you require;
- for audit and record-keeping purposes;
- to comply with our legal and regulatory obligations, including under the Financial Advisory and Intermediary Services Act 37 of 2002 ("FAIS"), the Financial Intelligence Centre Act 38 of 2001 ("FICA") and POPIA; and
- in connection with any lawful requirement of the Information Regulator, the Financial Sector Conduct Authority, another regulator or government agency, or in connection with legal proceedings or a court order.

This list is not exhaustive. Where we need to use your personal information for a purpose that is not compatible with the purpose for which we originally collected it, we will obtain your consent first, unless the law permits us to proceed without it.

5. WHO WE MAY SHARE YOUR PERSONAL INFORMATION WITH

We do not sell your personal information. Depending on the nature of the information and the service you have asked for, we may share your personal information with:

Recipient	Reason for sharing
Product providers, administrators and custodians	To place, administer and maintain the products and investments you have selected
Our operators and service providers	To perform services on our behalf, such as IT hosting, systems support, archiving and secure document destruction, under written agreements that require them to protect your information
Regulators and oversight bodies	Where we are required or permitted by law to provide information, for example to the Financial Sector Conduct Authority, the Financial Intelligence Centre or the Information Regulator
Courts, ombuds and dispute forums	Where information is requested or discovery is required under the applicable rules, including the FAIS Ombud
Auditors and professional advisers	For internal and external audit, accounting and legal purposes
Your authorised representatives	Where you have appointed a person to act on your behalf, or where a brokerage or financial adviser requires the information to provide a service to you

We may also need to enter your personal information into software or online platforms in order to process an application, a claim, or for business management purposes. This will only be done in accordance with POPIA.

6. SENDING YOUR PERSONAL INFORMATION OUTSIDE SOUTH AFRICA

Some of the systems and service providers we use may store or process personal information on servers located outside the Republic of South Africa.

Where we transfer your personal information outside South Africa, we will do so only in accordance with section 72 of POPIA – which means the recipient must be subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection, or you must have consented to the transfer, or the transfer must be necessary to perform a contract with you.

7. HOW WE PROTECT YOUR PERSONAL INFORMATION

We take appropriate, reasonable technical and organisational measures to keep your personal information confidential and secure, and to protect it against loss, damage, and unauthorised or unlawful access or processing. These measures include:

- technical safeguards such as encryption, firewalls, intrusion detection, strong password requirements and multi-factor authentication;
- physical safeguards controlling access to our premises and to the places where records are stored;
- organisational safeguards such as internal policies, staff training and confidentiality obligations in our employment contracts; and
- contractual safeguards requiring the operators and service providers who process personal information on our behalf to maintain equivalent standards of protection.

If we have reasonable grounds to believe that your personal information has been accessed or acquired by an unauthorised person, we will notify you and the Information Regulator as required by section 22 of POPIA.

8. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We keep your personal information only for as long as we need it for the purpose for which it was collected, or for as long as the law requires us to keep it – whichever is longer.

As a financial services provider, we are required to retain certain records for at least five years, including under FAIS and FICA. Records relating to a complaint are retained for at least five years from the date the complaint is resolved.

Once we no longer need your personal information, and no legal obligation requires us to keep it, we will destroy or delete it, or de-identify it, in a secure manner.

9. YOUR RIGHTS

POPIA gives you the following rights in relation to your personal information:

Your right	What it means
To be informed	To be told that we are collecting your personal information, and to be notified if it has been accessed by an unauthorised person
To access	To ask us to confirm, free of charge, whether we hold personal information about you, and to request a copy or description of it
To correction or deletion	To ask us to correct or update information that is inaccurate or out of date, or to delete information we are no longer entitled to keep
To object	To object, on reasonable grounds, to our processing of your personal information
To object to direct marketing	To ask us to stop sending you unsolicited direct marketing communications
Not to be subject to automated decisions	Not to be subject to a decision with legal or substantial consequences for you that is based solely on automated processing intended to profile you, subject to the exceptions in POPIA
To complain	To lodge a complaint with us, and with the Information Regulator

To exercise any of these rights, please contact our Information Officer using the details in section 12. We may ask you for proof of identity before acting on your request. Certain requests may need to be made on the form prescribed under the Promotion of Access to Information Act 2 of 2000 (“PAIA”), and our PAIA Manual, available on our website, explains how to do this.

10. DIRECT MARKETING

We may contact you about new products or developments that may be of interest to you, where the law permits us to do so.

You may tell us at any time that you do not want to receive marketing communications from us. Every electronic marketing communication we send will include a way to unsubscribe, and you may also contact our Information Officer directly. Withdrawing consent to marketing will not affect the services we provide to you.

11. COOKIES

Our website, and the websites of the companies whose products we distribute, may use “cookies” – small files placed on your device that allow the website to recognise you on a return visit. Cookies help us improve your experience of the site.

Most browsers allow you to refuse or delete cookies through your browser settings. Please note that disabling cookies may affect how parts of the website function.

12. HOW TO CONTACT US, AND HOW TO COMPLAIN

If you have any question or concern about how we handle your personal information, please contact our Information Officer first – we would prefer the opportunity to resolve it with you directly.

12.1 Our Information

Telephone	012 012 5291
Email	info@aluma.co.za

Our Protection of Personal Information Policy sets out our internal complaints procedure in full. In summary, we will acknowledge your complaint in writing within 2 working days and revert to you with a proposed resolution within 7 working days of receiving it.

12.2 The Information Regulator

If you are not satisfied with how we have dealt with your concern, you have the right to complain to the Information Regulator, which may be contacted at:

The Information Regulator (South Africa)

Physical Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Toll-free: 0800 017 160

General enquiries: enquiries@inforegulator.org.za

POPIA complaints: POPIAComplaints@inforegulator.org.za

Website: www.inforegulator.org.za

13. CHANGES TO THIS POLICY

We review this Privacy Policy at least once a year, and we may amend it from time to time to reflect changes in our business or in the law. The current version is always available on our website, and the version and review dates are shown on the cover page of this document.

ANNEXURE: DEFINITION OF PERSONAL INFORMATION

Section 1 of the Protection of Personal Information Act 4 of 2013 defines personal information as follows:

“‘personal information’ means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;*
- information relating to the education or the medical, financial, criminal or employment history of the person;*
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;*
- the biometric information of the person;*
- the personal opinions, views or preferences of the person;*
- 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;*
- the views or opinions of another individual about the person; and*
- 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.”*