PROTECTION OF PERSONAL INFORMATION POLICY

Éxito

INVESTMENT MANAGERS

We welcome You

ÉXITO INVESTMENT MANAGERS (PTY) LTD

REG NO 2020/432664/07

FSP NO 51399

1 INTRODUCTION

1.1 Personal information is information that can be related to an identifiable natural person or, to the extent applicable, a juristic person (known as a "data subject") Protection of personal information is enshrined in the Constitution of South Africa, and this policy aims to give effect to this right by regulating the way Éxito Investment Managers processes personal information.

1.2 Processing of personal information refers to any activity concerning personal information including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure, or destruction of information.

1.3 Éxito Investment Managers is an authorised financial services provider whose business activities include fund management services. Éxito Investment Managers may therefore need to collect personal information from its clients to comply with applicable law and/or to render efficient and effective services.

1.4 Éxito Investment Managers, as the responsible party, is committed to principles of accountability, transparency, and consensual and responsible

processing of personal information.

1.5 It is the intention of Éxito Investment Managers that this policy will protect an individual's personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.

2 PURPOSE OF PROCESSING PERSONAL INFORMATION

2.1 Personal information is processed for the following purpose(s):

2.1.1 to establish a legal relationship with a client;

2.1.2 to verify a client`s identity for security and regulatory purposes;

2.1.3 to populate client account information required on onboarding platforms to open a client account;

2.1.4 to generate statements and capture contact information related to a discretionary mandate or account;

2.1.5 to conclude a contract with clients and carry out the obligations in terms of that contract (including managing the account and complying with instructions and requests).

2.2 Any further processing of data must be compatible with the purpose(s) for

which the information was collected.

2.2.1 Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, are stored in archives for record-keeping and backup purposes only.

2.2.2 Éxito Investment Managers will not, without an individual's consent, share information with any other third parties, for any purposes whatsoever, without written consent by the person to whom the personal information relates.

3 OBTAINING PERSONAL INFORMATION

3.1 Personal information is acquired with the consent of the data subject, which consent can be withdrawn at any time by notification to Éxito Investment Managers.

3.2 As far as possible, personal information is collected directly from the data subject.

3.3 Éxito Investment Managers is committed to ensuring the accuracy of the personal information collected and uses the following measures to verify:

3.3.1 direct engagement with clients via email, telephone, or post;

3.3.2 confirmation from third party institution, if relevant;

3.3.3 requesting specific / original verification documentation applicable to the personal information provided.

4 STORAGE AND SECURITY OF PERSONAL INFORMATION

4.1.1 Éxito Investment Managers strives to ensure the security, integrity and privacy of personal information submitted. Éxito Investment Managers will review and update its security measures in accordance with legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, Éxito Investment Managers will endeavour to take all reasonable steps to protect the personal information, which an individual submits to Éxito Investment Managers or to Éxito Investment Managers' online products and services. Éxito Investment Managers will always set the highest standards to ensure the integrity of their systems.

4.2 Éxito Investment Managers may engage with other organisations to provide support services to Éxito Investment Managers. Third Parties are obliged to respect the confidentiality of any personal information held by Éxito Investment Managers. A Service Level agreement is in place with all Third parties to ensure adherence to all Privacy Policies.

4.3 Éxito Investment Managers' employees are obliged to respect the confidentiality of any personal information held by Steen Capital Partners. All employees are required to sign an employment contract which includes a confidentiality clause.

4.4 Éxito Investment Managers will not reveal any personal information to anyone unless:

4.4.1 It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law;

4.4.2 It is in the public interest to prevent financial loss;

4.4.3 The FSP needs to do so to protect their rights

4.5 Éxito Investment Managers endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date;

4.6 Éxito Investment Managers employed the following security measures to ensure the privacy and integrity of the personal information collected -

4.6.1 information is kept on a secure encrypted drive with limited access;

4.6.2 personal information password-protected when shared via email;

4.6.3 physical security and access control to Éxito Investment Managers' premises.

4.6.4 no third-party providers have direct access to clients` personal information unless specifically required by law and to satisfy client due diligence principles.

4.7 If at any time, an individual discovers that information gathered about them is incorrect, they may contact Éxito Investment Managers to have the information corrected. Éxito Investment Managers will not retain and/or store personal information longer than is necessary given the purpose for which the personal information was collected except for historical, statistical and research purposes and then only with suitable safeguards in place to ensure the privacy and integrity of the personal information.

5 BREACH OF SECURITY

5.1 Éxito Investment Managers undertakes to ensure reasonable organisation and technical measures are in place to prevent, insofar as possible, any infringements on the privacy and integrity of personal information.

5.2 In the event of a breach of security Éxito Investment Managers undertakes to notify the Regulator and the data subject in writing as soon as possible of any breach of security.

5.3 Notification to the data subject shall be done via e-mail to the data subject's last known e-mail address or as directed by the Regulator.

6 TRAINING

As part of its commitment to ensuring organisation-wide compliance with this policy, Éxito Investment Managers implements annual training for all staff members of Éxito Investment Managers.

7 INFORMATION OFFICER/CONTACT DETAILS

7.1 Any questions relating to Éxito Investment Managers' privacy policy or the treatment of an individual's personal data should be addressed to the Information Officer, whose contact details are:

Information officer: Walker Naudé

Telephone number: 010 541 1839

Postal address: 2874 Midmar Drive, Waterfall

Country Estate, 1682

Email address: info@exitoim.co.za



Website: www.exitoim.co.za