

Privacy Policy (‘Policy’)

This is the Policy of Regarding Capital Management Proprietary Limited (‘us’, ‘we’, ‘our’)

About this Policy

Protecting your personal information is critically important to us. We are committed to upholding your constitutional right to privacy and this Policy explains our approach.

In this Policy ‘personal information’ may include, but is not limited to, information such as your name, nationality, date of birth, address, identity number, trade mark, employment and financial history.

We may update this Policy from time to time.

Types of personal information

The types of personal information we collect about you may include, but is not limited to:

- A name
- An address – both physical and postal address
- An email address
- A telephone number
- An identity number/passport number
- Date of birth
- Employment information, such as education, occupation, name of employer and designation
- Financial and related information, such as a tax file number, a bank account number, details of investments

Importantly, we collect information that is -

- relevant to,*
- not excessive to; and*
- is lawful for*
the purpose for which it is collected by us. And is relevant to our business activities.

This means that not all of the types of personal information referenced above will always be collected by us.

Why we collect personal information

There are various reasons why we may collect personal information about you.

- To discharge our obligations under South African law, including but not limited to the Financial Intelligence Centre Act and associated anti-money laundering legislation.

- ii. Where our service providers, such as bankers, require us to collect personal information that is necessary for them to discharge their 'know-your-client' legal obligations.
- iii. If we appoint you to provide services to us, such as a director or an employee/contractor.
- iv. If you are a shareholder.

Who we collect personal information from

We may collect information from:

- i. You directly.
- ii. Your representative.
- iii. Other 3rd parties authorized to provide personal information to us.
- iv. Online applications, platforms and other public sources.

We predominantly collect personal information in digital format, but we may also collect a physical record.

What we do with personal information we collect

As is lawful and appropriate, we may:

- i. Store it digitally and/or physically.
- ii. Distribute it to our employees, staff, executives and directors.
- iii. Distribute it our group/associated companies. For example if the group/associate company appoints a common director.
- iv. Distribute it to our service providers, such as our bankers, in order for them to discharge their 'know-your-client' legal obligations.
- v. Distribute it to regulators and other law enforcement agencies who lawfully require us to do so.
- vi. With your involvement, update it.
- vii. Destroy it.

Storage and security of personal information

We store personal information:

- i. In physical files under our control.
- ii. In digital copy stored on our network including our terminal equipment.
- iii. On devices such as cell phones.

We are comfortable that we have security measures in place to protect personal information from theft, misuse and unauthorized access. Physical access to our office is controlled. Within our office, access to physical files is limited to certain staff on a need to know basis and our hardware and software systems are password protected, include firewalls and restricted use. Data is backed up daily, is encrypted and password protected.

Where we delete emails containing personal information, the email is deleted from the user's mailbox, but a copy remains archived on a cloud based platform we utilize for the protect the security of data and business continuity.

How to access your personal information

You can request that we:

- i. Confirm if we hold personal information about you.
- ii. Provide a credible description of the personal information we hold and provide details of who has or has had access to the personal information.
- iii. Correct/update the personal information.
- iv. Return the personal information to you.
- v. Destroy/delete your personal information.

Please contact us using the modes of contact under Corporate Information below, in order for us to assist you. Please note that justifiable circumstances may exist which legally prevent us from carrying out the request.

Our commitment

- i. To uphold the constitutional right to privacy, balancing this right to privacy with unnecessary impediments to the free flow of personal information.
- ii. To collect personal information for lawful purpose.
- iii. To use/distribute/disseminate personal information for lawful purpose.
- iv. To safeguard personal information against unlawfulness.

Our corporate information

Information Officer: Johannes (Jan) van Niekerk

Email: jan.vanniekerk@reem.co.za

For the attention of the Information Officer

Telephone: 021 203 2805

Address: 10th Floor, the Terraces, 34 Bree Street, Cape Town

Postal address: PO Box 44, Greenpoint, Western Cape 8051

Office of the Information Regulator

Email: infoereg@justice.gov.za

Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg 2001

Postal: PO Box 315533, Braamfontein, Johannesburg 2017

This Policy is dated: 1 July 2021

This policy may be amended from time to time without notice