



management  
company

**IP Management Company  
(‘IPMC’ or ‘Manager’)**

Privacy Policy

**CONFIDENTIAL**

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## PRIVACY POLICY

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IPMC takes collecting and processing personal information seriously. IPMC is committed to protecting personal information and to informing you of your rights with respect to your personal information. IPMC aims to set out clearly:

- what your personal information will be used for
- where it will be processed and
- how long it will kept.

You should also familiarize yourself with the sections of this Privacy Policy that inform you how you may control the use of your personal information.

This Privacy Policy applies to all services offered by IPMC and whenever we process your personal information.

### 1. Policy Scope

This Policy applies to anyone (you, your\*) who interacts with us, including identifiable Juristic Persons in South Africa (such as an incorporated company), who enquires about our products and services or who makes use of them, via any media including: electronic media such as email, website, apps, telephone etc.

\*You may be a prospect, client, employee, agent or consultant providing services to IPMC or to whom IPMC is providing services.

### 2. Definition of Personal Information

Personal information is information relating to a living individual that can be used to identify or contact them, and will include an individual's business information such as their business contact details.

### 3. Processing

We process your personal information when we collect, store, use in any way for any purpose or delete your personal information.

### 4. Personal Information Collection

In order for IPMC to provide services to you and discharge regulatory and legal obligations in respect of its processing activities, IPMC will necessarily process your personal information. If we are unable to process your personal information we may not be able to provide our services to you or administer our business.

The personal information we need to collect will depend on the service(s) that we provide to you but we will only process personal information required to enable us to do so. We usually collect personal information about you from you directly but in certain circumstances we may collect personal information on you from other sources such as publicly or privately available records.

IPMC commonly collects personal information as follows:

- Photographic ID and documents to verify both your identity and residential address in order to satisfy anti-money laundering regulations. If you do not provide this personal information to us we will not be able to establish or continue in a business relationship with you or any person acting for you;
- Your contact details, including but not limited to, telephone numbers, location details such as personal or business address and email address in order to communicate with you;
- Criminal background checks as part of our anti-money laundering or counter terrorist financing screening to comply with relevant legislation;
- Proof of age and location, in order to ensure that we may legally provide you with the relevant product or service;
- Bank details where you are required to make payment to us or we are required to remit payment to you;
- Recording, monitoring, storing data from telephone calls in which you participate, in order to comply with regulatory or contractual obligations, and to confirm instructions given to us;
- For Juristic Persons we may also collect documents to establish your identity and existence.
- We will tell you beforehand about any use of your personal information if you have not already consented to such use, or if this use has not previously been disclosed.

You are responsible for ensuring we always have accurate and up-to-date information.

Where you provide us with information about other individuals or Juristic Persons in connection with your dealings with us, you must ensure that they agree to us using their information for the purposes set out in our application forms and or agreements and you will need to inform them of this Policy.

## 5. Use of Personal Information

We process personal information primarily for the purpose of providing contracted services to you but in addition to this we may use your information for the following purposes:

- To meet a legal or regulatory requirement;
- To advise you of changes that may affect you that we feel are in your best interests such as communications about purchases and changes to our terms and conditions, and policies. As this information is important to your interaction with IPMC, you may not opt out of receiving these communications;
- For internal administrative and accounting, auditing, data analysis and research purposes in the normal course of managing our business and to improve IPMC services and customer communications;
- If we believe that we have a legitimate interest or that you have a legitimate interest and to not use your personal information may have a negative impact on you.

## 6. Processing Your Personal Information

IPMC personnel will process your information, however IPMC may also arrange for third party service providers such as:

- IPMC's accountants, your accountants or those appointed by an entity connected to you, our security teams, banks (for instance for making payments), custodians, depositaries, funds, portfolio managers, distributors, regulatory bodies, your advisors or those appointed by an entity connected to you, our advisors, fund advisors, IT service providers, telecommunications providers, third party business processing providers, share personal information with our investors / shareholders or any potential acquiring party, bank or financing institution for IPMC's legitimate business interests and with other parties with whom IPMC contracts to access and process your personal information in order for the relevant services to be provided to you. These third party service providers are variously under duties of client confidentiality covering the storage and disclosure of your personal information in order to safeguard it, prevent unauthorized access and to comply with relevant data protection laws.

## 7. Storing and deleting your personal information

The personal information that we hold may be retained and stored for a period after our relationship has ended. The length of the storage period is determined by relevant local data protection law and regulations. We will delete or obfuscate your personal information once it is no longer required for the processing purposes. This will be done as soon as possible subject to administrative practicalities.

Where regulatory requirements require us to keep your personal information for a longer period we will have to do so. Once the regulatory retention period has expired we will securely destroy or obfuscate all of your personal information, except where it is required in litigation, or has been requested by a Supervisory Authority or other law enforcement agency, or where you have requested that it be retained (and have paid an appropriate fee to do so).

## 8. Cookies and other technologies

IPMC's websites, online services, interactive applications, email messages, and advertisements may use cookies and other technologies.

Cookie technology consists of small pieces of data or a small text file, which is given to your browser by our webserver when you visit our website. This data is stored on your browser. The cookie is sent back to our webserver each time you visit our website. Cookies are not computer programs and do not run on a computer like programs do. They cannot gather information or function on their own. They cannot collect any personal information about you or your machine and cannot gather data or information about what you do on the internet. Cookies merely enable us to provide a more valuable online experience to you. The only information we have about your identity is the information you explicitly provide to us through submission forms on our website. We do not sell any personal information to any third parties. We do analyse user behaviour in order to better serve you and other visitors. Tracking your activity through our site (what you click on, how long you stay) helps us make better decisions about content and design."

While you can set up your internet browser to disable cookie technology, we do not recommend that you do as you may experience reduced functionality while browsing this website.

Our website may contain links to or from other sites: While we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the content or the security or privacy practices employed by other websites. We recommend that you always read the privacy and security statements on such websites. This includes any social media organisations who may collect data from you should you choose to use any social media sharing buttons on our website.

Own risk: IPMC cannot guarantee the security of any information you transmit to it online and you do so at your own risk.

Right to amend this privacy and security statement: We reserve the right to amend this Privacy Policy and supporting documents at any time. Amendments will be posted on our website where required. Unless otherwise stated, the current version shall supersede and replace all previous versions. It is your responsibility to check for changes each time you visit our website. If you use the website after any changes to this privacy notice have been made, we will assume that you agree to all of the changes.

These technologies help us better understand user behaviour, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. However, as Internet Protocol (IP) addresses or similar identifiers are generally considered personal information by some local laws, we also treat IP as personal information. We may make use of third parties to collect and process your personal information in order to provide products and services to you.

Please also refer to the terms and conditions associated with the use of our **Secure Portal**.

## 9. Personal Information for Marketing

We may use your personal information for reasonable marketing purposes about our products and services and, topical news and information, if you have given your permission for us to do this.

You may unsubscribe from marketing communications at any time by clicking the unsubscribe link at the bottom of each email. IPMC will continue to contact you in regard to your account but unsubscribe you from marketing communications.

Communications sent with regard to your investment including but not limited to welcome letters, statements, tax certificates, distribution statements, ballot letters, minimum disclosure documents, fact sheets and general correspondence regarding fees and portfolio changes are not regarded as being for marketing purposes in this context and there is no option to unsubscribe.

## 10. Electronic Communications Policy

By visiting our website or communicating with us by electronic means, you consent to receiving communications electronically and agree that all agreements, notices, disclosures and all other communications transmitted by electronic means (or under disclosures on our website satisfies any legal requirement, including but not limited to the requirement that such communication should be "in writing". Should you inform IPMC that you do not want us to use your personal information as a basis for further contact with you or for any other purpose, we will not do so.

## 11. Right to Access and Correct Personal Information

You have a right to have a copy of your personal information that we hold by contacting us at [clientservices@ipmc.co.za](mailto:clientservices@ipmc.co.za). You also have a right to require that any inaccurate personal information is corrected. For further information on your rights please see the section below headed: **Information Officer**.

## 12. Sharing and transferring Personal Information

We will never sell your personal information. We may share your personal information within the IPMC group of companies, if applicable, and with third party service providers to IPMC and regulatory or legal authorities only for the purpose of providing our contracted service(s) to you or as required by regulations or law.

IPMC operates primarily in South Africa but has dealings with international entities in the normal course of business. In addition, by the very nature of the provision of some services and the associated technology utilised, some data may be stored and or transferred internationally.

IPMC uses a number of service providers who may have access to your personal information as set out above. IPMC has made arrangements with these providers so that your personal information may be moved safely to and from their offices and personnel.

## 13. Changes to this Policy

We will place any updates to this Policy (or any other policies referred to in this Policy) from time to time on our website.

## 14. Consent

The Data Subject hereby:

- acknowledges that IP Management Company (RF) Pty Ltd (the 'Manager') is obliged, in terms of and in accordance with South African law, including but not limited to the Financial Intelligence Centre Act, 2001 (Act No. 38 of 2001), as amended ("**FIC Act**"), the Collective Investment Schemes Control Act, 2002 (Act No. 45 of 2002), as amended, the Protection of Personal Information Act, 2013 (Act No. 4 of 2013), as amended ("**PoPI Act**"), the Consumer Protection Act, 2008 (Act No. 68 of 2008), as amended, the Electronic Communications and Transactions Act, 2002

(Act No. 25 of 2002), as amended, the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000), as amended, and the Income Tax Act, 1962 (Act No. 58 of 1962), as amended, to -

- collect, procure, obtain and receive, directly and/or indirectly, from the Data Subject or another third party, information of, amongst others, a personal and/or confidential nature; and
  - process and/or outsource such information electronically and/or otherwise; and
  - store and retain, where applicable, such information; and
  - share or disclose, where required or obliged, such information; and
- consents to the Manager collecting, procuring, obtaining, receiving, processing, outsourcing, storing, retaining, sharing and disclosing, as the case may be, such information in accordance with the laws prevailing from time to time and the Manager's prevailing Privacy Policy from time to time, which policy -
- is incorporated herein by reference; and
  - can be accessed on the Manager's website; and
  - may be updated from time to time, with such updated version automatically superseding and replacing the previous version, with the Company hereby undertaking to keep himself/herself or itself up to date with any and all such changes or updates by regularly viewing the applicable page on the Manager's website
- undertakes to:
- acquaint himself/herself or itself with the Manager's prevailing Privacy Policy from time to time with particular reference to the notification provisions provided for in Section 18 of the PoPI Act and the FIC Act requirements; and
  - provide the Manager with such information and documentation as may be required, from time to time, by law or to enable the Manager to carry out its mandate or perform its duties and undertake its responsibilities.

the Manager hereby notifies the Data Subject, in terms of Section 18 of the PoPI Act, with such details incorporated herein by reference. Should the Data Subject Company not have access to the internet, a copy of the Manager's prevailing Privacy Policy can be obtained by requesting a copy by emailing the Manager at [riskandcompliance@ipmc.co.za](mailto:riskandcompliance@ipmc.co.za).

## 15. Information Officer

We have appointed an Information Officer who is responsible for ensuring that IPMC is compliant with relevant data protection laws. If you have any questions or concerns about personal information or our Policy or you wish to make a complaint about how we have processed your personal information, or you wish to exercise any of your rights as a data subject please contact our Information Officer at:

[complaints@ipmc.co.za](mailto:complaints@ipmc.co.za)

You may also contact us by post at the following address:

Information Officer  
IP Management Company (RF) Pty Ltd  
PO Box 23271  
Claremont  
7735

The contact details for the Information Regulator (South Africa) can be found at <https://www.justice.gov.za/inforeg/contact.html>