



## **PRIVACY POLICY**

### **Introduction**

This website is owned and operated by Warders Sullen Private Capital Proprietary Limited, Registration number 2024/260888/07, ("Warders Sullen") and will be referred to collectively as "we", "our" and "us".

This Privacy Policy relates to the collection and use of personal information you may supply to us through your conduct on our website. As a trusted guardian of your personal information, Warders Sullen is committed to processing personal information honestly, ethically, with integrity, and always consistent with applicable laws and our privacy commitments.

Your privacy is important to us, just as knowing how we use your information is important to you. If for any reason you think that your personal information is not processed in the correct manner, or that your personal information is being used for a purpose other than that for what it was originally intended, you can contact Warders Sullen's Information Officer.

We respect your privacy and personal information and commit to:

- Obtain and process your information fairly.
- Keep your information only for one or more specified, explicit, and lawful purposes.
- Use and disclose your information only in ways compatible with these purposes.
- Keep your information safe, secure, complete and up to date.
- Ensure that your information is adequate, relevant, and not excessive.
- Retain your information for no longer than is necessary for the intended purpose.
- Provide you with a copy of your personal data on request.

### **Collection of personal information**

The types of personal information we collect:

#### **Personal data**

- While using our website, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

As a website visitor - Cookies and usage data.

As a website user who completes the contact form - First name, last name, email address, contact number, company name, city and cookies and usage data.

### **Usage Data**

- We may also collect information how the website is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages, data queries requested, data downloads or exports requested, notifications received, application personal preferences, unique device identifiers and other diagnostic data.

### **Tracking & Cookies Data**

- We use cookies and similar tracking technologies to track the activity on our website and hold certain information.
- Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.
- You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our website.
- Examples of Cookies we use:
  - Necessary cookies are required to enable the basic features of the website, such as providing secure log-in or adjusting your consent preferences. These cookies do not store any personally identifiable data.
  - Functional cookies help perform certain functionalities like sharing the content of the website on social media platforms, collecting feedback, and other third-party features.
  - Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc.
  - Performance cookies are used to understand and analyze the key performance indexes of the website which helps in delivering a better user experience for the visitors.
  - Advertisement cookies are used to provide visitors with customized advertisements based on the pages you visited previously and to analyze the effectiveness of the ad campaigns.

## **Use of personal information**

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Complying with the obligations contained in the agreement concluded between yourself and Warders Sullen;
- To verify your identity, banking details and tax details (if applicable);
- To administer and provide compliance services to you;
- To notify you of new products and/or services that may be of interest to you;
- To confirm, verify and update your details; and
- To comply with any legal and regulatory requirements.

We will only use (collect, disclose, collate, process and store) your personal information to enable the lawful processing of transactions for which it is required. This extends to our service providers with regards to the protection of personal information.

## **Disclosure and sharing of personal information**

We may disclose your Personal Data in the good faith and belief that such action is necessary:

- To comply with a legal obligation.
- To protect and defend our rights or property.
- To prevent or investigate possible wrongdoing in connection our services.
- To protect the personal safety of users of our services or the public.
- To protect against legal liability.

We may need to share your information with third parties who provide support services that you have requested. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us.

These third parties may include:

- The various regulatory bodies or governmental authorities that Warders Sullen will need to continuously update and adhere to such as the Companies and Intellectual Property Commission, Financial Sector Conduct Authority, South African Revenue Services and the Financial Intelligence Centre;
- The private equity funds that we administer and the managers of those funds;
- The various third party providers that we work with consultants, company secretaries, auditors and/or compliance officers;
- Analytics and search engine providers assisting in the enhancement of our websites;
- Information Technology specialists assisting us with data storage, security, processing, analytics, etc.

## **Security and monitoring of systems**

We do take all reasonable steps to ensure the personal information submitted on our website is secure. We regularly monitor our systems to ensure we have adequate safeguards in place to keep personal information safe from breaches (cyber-attacks that could result in data leaks, loss of data or damage). While we cannot ensure or warrant the security of the personal information you provide us, we will continue to maintain and improve system security measures over time in line with legal and technological developments. Although all reasonable steps have been taken to prevent the occurrence of a breach, we cannot guarantee to never experience a breach.

Should a breach occur, we will inform you timeously of remedial steps taken to minimise the threat to your privacy and how you can help minimise the impact.

However, we will not be held responsible for events arising from unauthorised access to your personal information, where we have adequately implemented sufficient security safeguards and conducted ourselves in good faith not to cause harm or act negligently towards your personal information.

## **Request for personal data**

You have the following rights:

- To be informed about the personal information we have, and what we do with it.
- To ask us what we know about you.
- To ask what information was sent to our suppliers, service providers or any other third party.
- To ask us to update, correct or delete any out-of-date or incorrect personal information we hold about you if it is no longer necessary to provide services to you (we can unfortunately not take responsibility for incorrect or outdated information if we were provided with incorrect information, or you failed to inform us of changes).
- To receive your personal information and to transfer it to another service provider.
- To unsubscribe from any direct marketing communications, we may send you.
- To object to the processing of your personal information.
- To request access to the information we hold about you or correct your personal information by contacting us.
- It can take up to 21 business days to respond to your request, because there are procedures that we need to follow. In certain cases, we may require proof of your identity, and sometimes changes to your information may be subject to additional requirements such as valid proof of residence.

**Information Officer Contact Details**

Shareese Boazak

Email Address: [shareese.boezak@warderssullen.com](mailto:shareese.boezak@warderssullen.com)

**Our details:**

Warders Sullen Private Capital Proprietary Limited

3 Valley Road

Benmore Gardens

Sandton

2196

**The Information Regulator**

If your personal information has not been processed in accordance with POPIA and the principles set out above, you have the right to lodge a complaint with the Information Regulator.

For further information regarding the complaints process, please visit the website of the Information Regulator, as indicated below.

Alternatively, you may contact the Information Regulator for further assistance:

The Information Regulator: Adv Pansy Tlakula

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

Email: [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)

Website: <https://inforegulator.org.za/>

**Updates to this privacy policy**

We reserve the right, at our discretion, to modify or make alterations to this privacy policy at any time and publish accordingly.

**Disclaimer**

All copyright, confidential information, patents, design rights and all other intellectual property rights of whatsoever nature contained herein are and shall remain the sole and exclusive property of WARDERS SULLEN. The information furnished herein is believed to be accurate and reliable. However, no responsibility is assumed by WARDERS SULLEN for its use,

or for any infringements of patents or other rights of third parties resulting from its use. We reserve the right, at our discretion, to modify or remove portions of this Privacy Policy at any time. We do not make any representations about third party websites that may be linked to the website.