



# Privacy notice

May 2022

## 1. What Personal Information does the Company require?

- 1.1 REdimension Capital (Pty) Ltd ("REdimension" or the "Company") Data Protection & Privacy Policy governs the Processing of your Personal Information.

You may view the Data Protection & Privacy Policy by contacting the Information Officer on [Compliance@REdimensionCapital.com](mailto:Compliance@REdimensionCapital.com)

- 1.2 "Personal Information" is defined in the Protection of Personal Information Act (Act no. 4 of 2013) ("POPIA") as follows:

"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, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal, or the employment history of the person;
- any identifying number, symbol, email 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."

- 1.3 "Processing" is defined in POPIA as follows:

"any operation or activity or any set of operations, whether or not by automatic means, 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 form; or

- merging, linking, as well as restriction, degradation, erasure or destruction of information;”

1.4 The Company is a Responsible Party in respect of the Personal Information on you (the “Data Subject”) provide to the Company. The Company processes the following types of Personal Information:

- Identification document;
- Proof of residential/business operating address;
- South African Income Tax registration number;
- South African VAT registration number (if applicable per individual/legal entity);
- Contact numbers;
- E-mail addresses;
- Banking details;
- CIPC documents;
- Company Organogram/Details of Beneficial ownership (Person/Legal entity) greater than 25%
- Details of PEP (Political Exposed Person)
- Fund/portfolio related investment information, including holdings, transaction data, performance and attribution data.

## 2. Why does the Company require your Personal Information?

2.1 This Personal Information is required in terms of the Financial Intelligence Centre Act, 38 of 2001 and the Company’s risk management policies. The Personal Information forms part of the Company’s requirements when, amongst other things, an investment is made into any fund to which the Company is the appointed Investment Advisor (“Fund” or “Funds”) or to facilitate the relevant business activities.

2.2 The Company needs your Personal Information to provide you with the following services:

- Responding to your queries posted on our website or emailed to us;
- Providing you with our services;
- Referring you to other service providers with your consent;

- Improving our website and services by analysing certain information collected, including cookies and other related information;
- sending you information (in the form of our Communication) and inviting you to events; and/or complying with our regulatory or other obligations;
- To populate client information required on the various on-boarding platforms to verify you and administer any investment in a Fund;
- To generate statements and capture contact information related to any investment in a Fund;
- To provide portfolio reporting to data subjects, industry surveys and newsletters, consultants and new business enquiries; and
- To record and administer all supplier related statements and payments.

### 3. How is your Personal Information Processed?

- 3.1 No third-party providers have direct access to your Personal Information unless specifically required by law and to satisfy client due diligence principles.
- 3.2 Personal Information is processed only for the purposes for which the Personal Information is intended and for REdimension to perform its responsibilities in terms of any agreement, and not for other purposes.
- 3.3 Your Personal Information is shared with the Prescient Fund Services (Pty) Ltd, for investment administration purposes.
- 3.4 As required for REdimension to perform its responsibilities in terms of any Investment Advisory Agreement signed between REdimension and the Funds to which it is mandated.

### 4. How long does the Company keep your Personal Information?

- 4.1 Under South African law, the Company is required to keep Personal Information for a five (5) year period following the date of termination of the business relationship. After this period, Personal Information will be kept for so long as it is required to honour REdimension's contractual relationships or as long as is legally necessary for the Company to do so.

### 5. What are your rights?

- 5.1 Should you believe that any of your Personal Information held by the Company is incorrect or incomplete, you have the right to request to view this information, rectify it or have it deleted. Please contact the Company's Information Officer on [Compliance@REdimensioncapital.com](mailto:Compliance@REdimensioncapital.com) should this be required.

- 5.2 In addition, if you wish to complain about how the Company has handled your Personal Information, please contact the Information Officer on [Compliance@REdimensioncapital.com](mailto:Compliance@REdimensioncapital.com). The Company's Compliance Department will investigate your complaint and contact you within two (2) business days of the complaint being lodged and work with you to resolve the matter.
- 5.3 If your query relating to your Personal Information is not, in your opinion, adequately dealt with, you can contact the Information Regulator on 012 406 4818 or [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za) to file an official complaint.