



GOVERNANCE & COMPLIANCE · LEGAL NOTICE

Privacy Notice

Effective April 2026

Incl. Appendix A — California Consumer Privacy Statement

Confidential — for use by intended recipients only

GONEKE INVESTMENT GROUP

GONEKE INVESTMENT GROUP · WWW.GONEKE.COM



Privacy Notice

How Goneke Investment Group processes personal data collected through our Sites, our premises, and our business relationships.

01 SCOPE

We at Goneke Investment Group Proprietary Limited ("GIG") respect your concerns about privacy. This notice describes how we process Personal Data:

- that we collect on goneke.com, or any pages accessible through goneke.com, and other websites or applications that link to this notice (the "Sites");
- where you visit our premises;
- where you are a contact at one of our suppliers or other business partners; and
- through other data collection points or notices that reference this notice.

We provide information on the types of Personal Data we collect, how we use it, with whom we may share it, and the choices available to you, and describe the measures we take to protect the security of that information.

"Personal Data" has the meaning given to it under applicable data protection laws, including the Protection of Personal Information Act 4 of 2013 ("POPIA") and, where applicable, the EU General Data Protection Regulation ("GDPR"). It includes any information that relates to, describes, identifies or can be used, directly or indirectly, to identify an individual, such as name, address, date of birth, personal identification numbers, sensitive personal information, and economic information.

02 INFORMATION WE OBTAIN

The types of information we collect concerning individuals include:

- Business and personal contact information (name, postal and e-mail addresses, telephone number);
- Demographic information, such as age, race, gender, and citizenship;
- Account information, including login credentials for our Investor Portal and career site;
- Financial and other information provided in connection with our Investor Portal, such as date of birth, banking information, account numbers, taxpayer ID number, jurisdiction of tax residence, and investment-related information;
- Government-issued identifiers and other information required to identify you and complete necessary security and safety checks;
- CCTV footage on our premises, for the safeguarding of customers, employees, facilities, and property;
- Content of your electronic communications with us or our service providers;



- Professional details and employment data in connection with job inquiries or applications, such as resume/CV, employment history, performance-related information, talent management information, and work authorisation status;
- Voluntary information provided in connection with job applications, including diversity-related information such as gender, race/ethnicity, veteran status, and disability status;
- Information from third-party data providers and publicly available sources for AML compliance, background screening, and to otherwise protect our business and comply with legal obligations;
- Information relating to our charitable foundation and your involvement with our philanthropic causes;
- Information relating to your participation in our programmes, events, or workshops;
- Information from organisations that you represent and with which we have a business relationship; and
- Other information you provide to us, such as by registering for e-mail alerts or filling in forms.

If you provide information to us about another person, you should ensure that you provide that person with this notice and comply with any legal obligations that may apply to your provision of that information to us.

03 INFORMATION WE OBTAIN BY AUTOMATED MEANS

When you visit our Sites or open our e-mails, we may collect certain information by automated means, such as cookies, web server logs, web beacons, and JavaScript, including your IP address, network location, browser and device characteristics, operating system, referring URLs, actions taken on our Sites, and dates and times of website visits.

Please see our Cookie Notice for information about how we use cookies and similar technology. We also may use these technologies in e-mails we send you, to collect information such as whether you opened or clicked links in our e-mails.

We may use third-party web analytics services, such as Google Analytics, to help us analyse how visitors use the Sites. The information processed for this purpose — including your IP address and other information collected by automated means — may be disclosed to or collected directly by these service providers.

Our Sites are not designed to respond to “do not track” signals received from browsers.

04 LAWFUL BASIS FOR PROCESSING

In accordance with POPIA and, where applicable, the GDPR, we process your Personal Data only where we have a lawful basis to do so, including:

- **Consent** — where you have given clear consent for a specific purpose;
- **Contract** — where processing is necessary for the performance of a contract with you, or to take steps at your request before entering into one;
- **Legal obligation** — where processing is necessary for compliance with a legal or regulatory obligation;



- **Legitimate interests** — where processing is necessary for our legitimate interests or those of a third party, except where overridden by your interests or fundamental rights and freedoms; and
- **Public interest** — where processing is necessary for a task carried out in the public interest or exercise of official authority vested in us.

Where we rely on legitimate interests, we do so only where we have concluded that our processing does not prejudice you or your privacy in a way that would override those interests.

05 HOW WE USE THE INFORMATION WE OBTAIN

We may use, disclose, or otherwise handle the information described in this notice to:

- Operate, evaluate, develop, promote, and improve our business, including managing our communications, premises, and internal accounting and auditing functions;
- Create and manage your account, and manage your investments;
- Comply with and enforce applicable legal requirements, industry standards, and our policies;
- Protect against, identify, and prevent fraud, money-laundering, breach of confidence, cyberattack, theft of proprietary materials, and other unlawful activity;
- Provide our products and services, such as market commentary and e-mail alerts;
- Send promotional materials, newsletters, and other communications;
- Administer your participation in events, programmes, promotions, offers, surveys, and market research;
- Respond to your enquiries; manage employment applications and assess qualifications; verify your information;
- Perform data analyses, including market and consumer research, demographic analyses, and anonymisation and aggregation of information;
- Operate, schedule, and facilitate online meetings, webinars, and video conferences;
- Record and monitor electronic interactions with us or our service providers, to the extent permitted by law; and
- Record audio and video content of in-person or online events, training, and meetings, where permitted by law.

CCTV operates in some of our buildings for security and safety purposes in accordance with applicable data protection law. We will only process your Personal Data as necessary to pursue the purposes described above.

06 AUTOMATED DECISION-MAKING AND ARTIFICIAL INTELLIGENCE

We may use automated processing and, in limited circumstances, AI tools and algorithms to assist in the analysis of data and delivery of our services. Where automated processing produces decisions that significantly affect you, we will:

- Inform you that such automated decision-making is taking place;
- Explain the logic involved and the significance and envisaged consequences for you;
- Provide you with the right to request human review of the decision; and



- Refrain from using your sensitive personal information for automated profiling without your explicit consent.

We do not use automated decision-making in a way that produces legal effects, or similarly significant effects on individuals, without appropriate human oversight.

07 ONLINE TRACKING AND INTEREST-BASED ADVERTISING

We and third parties acting on our behalf, such as LinkedIn, may collect information about your online activities over time and across third-party websites to provide advertising tailored to your interests. Where required by applicable law, we will obtain your consent for the processing of your Personal Data for direct marketing purposes.

If you receive direct marketing communications from us, you may opt out by clicking the unsubscribe link in the relevant communication or by e-mailing info@goneke.com.

08 INFORMATION WE DISCLOSE TO OTHERS

We do not disclose Personal Data we obtain about you except as described in this notice. We may share your Personal Data with our affiliates and subsidiaries, and depending on the nature of our relationship with you, also with:

- Service providers who perform services on our behalf, including cloud services;
- Financial and transaction counterparties;
- Philanthropic, charitable, and advocacy partners;
- Our professional advisors, including auditors, legal counsel, and accountants; and
- Your agents and representatives.

We do not authorise these persons to use or disclose the information except as necessary for the purposes for which it is provided or to comply with legal requirements.

We also may disclose information about you if required by law or legal process; to law enforcement, regulators, or government entities pursuant to a lawful disclosure request; or where we believe disclosure is necessary to prevent harm or financial loss, or in connection with an investigation of suspected fraudulent or illegal activity. We reserve the right to transfer Personal Data in the event we sell or transfer all or a portion of our business or assets.

09 DATA BREACH NOTIFICATION

In accordance with POPIA and applicable data protection laws, in the event we become aware of a security compromise involving your Personal Data, we will:

- Notify the South African Information Regulator as soon as we are reasonably certain that a compromise has occurred, without undue delay;
 - Notify affected data subjects in a manner that allows them to take protective measures, unless the Information Regulator agrees that notification is not required; and
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- Document all security compromises, including those that do not result in notification, for accountability and audit purposes.

Our incident response plan is reviewed annually and tested to ensure it remains effective.

10 DATA TRANSFERS

We may transfer the Personal Data we collect about you to recipients in countries other than the country in which the information was originally collected, including transfers outside South Africa, the UK, or the EU where those territories impose data transfer restrictions.

Where we transfer Personal Data outside of the relevant territory, we will ensure that appropriate safeguards are in place, including:

- Data transfer agreements incorporating standard contractual clauses approved by the relevant authority;
 - Binding corporate rules where applicable; or
 - Any other mechanism recognised as providing an adequate level of protection under applicable law.
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11 RETENTION AND DELETION OF YOUR INFORMATION

We intend to keep your Personal Data accurate and up to date, and will delete information that we hold when we no longer need it. We retain your Personal Data for as long as required for our legitimate purposes, to perform our contractual obligations, or such longer period as required or permitted by law.

- Data is retained no longer than necessary for the purpose for which it was collected (POPIA's storage limitation principle);
 - Retention schedules are documented and reviewed annually; and
 - Upon expiry of the applicable retention period, data is securely deleted or anonymised.
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12 YOUR RIGHTS AND CHOICES

To the extent provided by the law of your jurisdiction, you have the following rights in connection with your Personal Data:

- **Right of access** — confirm whether we hold Personal Data about you and, if so, obtain a copy;
 - **Right to correction** — correct inaccurate or incomplete Personal Data;
 - **Right to deletion** — request deletion, subject to applicable legal obligations;
 - **Right to object** — object to processing for direct marketing at any time, and in certain other circumstances;
 - **Right to data portability** — request transfer of your Personal Data in a structured, machine-readable format;
 - **Right to opt out of automated decision-making** — request human review where automated processing produces significant effects; and
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- **Right to withdraw consent** — at any time, without affecting the lawfulness of processing carried out prior to withdrawal.

If you are dissatisfied with our response, you may lodge a complaint with the relevant supervisory authority: the Information Regulator in South Africa (justice.gov.za/infoereg); your local data protection authority in the EU; or the Information Commissioner's Office in the UK (ico.org.uk).

13 HOW WE PROTECT PERSONAL DATA

We maintain administrative, technical, and physical safeguards designed to protect the Personal Data we obtain against accidental, unlawful, or unauthorised destruction, loss, alteration, access, disclosure, or use, including:

- Encryption of Personal Data in transit and at rest;
 - Access controls and authentication mechanisms limiting access to authorised personnel;
 - Regular security assessments, penetration testing, and vulnerability management;
 - Staff training on data privacy and security obligations; and
 - Third-party processor due diligence and contractual data processing agreements.
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14 INFORMATION OFFICER

In accordance with POPIA, GIG has appointed an Information Officer responsible for ensuring compliance with POPIA and this notice. Our Information Officer is registered with the South African Information Regulator.

Any queries relating to the processing of your Personal Data, requests to exercise your rights, or concerns about our privacy practices should be directed to our Information Officer.

15 LINKS TO OTHER WEBSITES

Our Sites may provide links to other websites for your convenience and information. These websites may operate independently from us and may have their own privacy notices, which we strongly suggest you review. We are not responsible for the content, use, or privacy practices of websites not owned or controlled by us.

16 UPDATES TO THIS NOTICE

This notice may be updated periodically and without prior notice to reflect changes in our Personal Data practices or applicable law. We will post the updated version on the Sites and indicate at the top when it was most recently updated. Where changes are material, we will take reasonable steps to notify you directly, such as by e-mail or a prominent notice on our Sites.



17 HOW TO CONTACT US

If you have any questions or comments about this notice, or would like us to update information we hold about you, please contact us:

Email info@goneke.com

Web form goneke.com

Goneke Investment Group South Africa Proprietary Limited

Attn: Information Officer / Legal & Compliance

70 Melville Road, Illovo

Johannesburg, Gauteng, 2196 · South Africa

Individuals in the UK and EU may write to:

Goneke Investment Group Europe LLP

Attn: Legal & Compliance

17 Rickfield

Crawley, RH10 8EF · United Kingdom

Please also contact us via any of the above methods if you require this notice in an alternative format.



APPENDIX A

California Consumer Privacy Statement

This California Consumer Privacy Statement ("Statement") supplements the Privacy Notice. It applies solely to California consumers, including visitors to our premises and public-facing websites and mobile apps, GIG job applicants, and representatives of our suppliers and business partners.

This Statement does not apply to: (1) GIG personnel, their emergency contacts, or relatives for whom we administer benefits; or (2) information collected, processed, or disclosed in connection with financial products or services under the Gramm-Leach-Bliley Act or the California Financial Information Privacy Act.

This Statement uses terms defined in the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act of 2020 ("CPRA"), and its implementing regulations, including the 2025 regulations on automated decision-making technology ("ADMT"), privacy risk assessments, and cybersecurity audits.

A COLLECTION AND USE OF PERSONAL INFORMATION

We may collect, and may have collected during the 12-month period prior to the effective date of this Statement, the following categories of personal information:

- **Identifiers** — name, postal address, unique personal identifier, online identifier, IP address, e-mail address, account name, Social Security number, driver's licence number, passport number, and similar identifiers;
- **Additional data subject to Cal. Civ. Code § 1798.80** — signature, state identification card number, education, and financial information;
- **Protected classifications** — race, colour, national origin, age, sex, gender, sexual orientation, medical condition, citizenship status, and military and veteran status;
- **Commercial information** — records of products or services purchased, obtained, or considered;
- **Online activity** — internet and electronic network activity, including browsing and search history, and interaction with websites, applications, or advertisements;
- **Sensory information** — audio, electronic, visual, and similar information;
- **Employment information** — professional or employment-related information; and
- **Inferences** — drawn from the above to create a profile reflecting your preferences, characteristics, and aptitudes.

B AUTOMATED DECISION-MAKING TECHNOLOGY (ADMT)

In accordance with the 2025 CPPA regulations on ADMT, where we use automated decision-making technology that produces decisions that significantly affect you, we will provide a Pre-Use Notice disclosing the purpose, the categories of Personal Data used, and your right to opt out. You may exercise your right to opt out of ADMT by contacting us at privacyqueries@goneke.com.



C SALE OR SHARING OF PERSONAL INFORMATION

We do not sell your personal information in exchange for monetary compensation. We may disclose your personal information by allowing certain third parties, such as online advertising services, to collect personal information via automated technologies on our websites for cross-context behavioural advertising purposes. Under California law, these disclosures may be considered a “sale” or “sharing.” You have the right to opt out.

We do not have actual knowledge that we sell or share the personal information of minors under 16 years of age.

D CALIFORNIA CONSUMER PRIVACY RIGHTS

- **Access** — request, twice in a 12-month period, disclosure of the personal information we have collected, used, disclosed, and sold about you during the past 12 months;
 - **Correction** — request correction of inaccurate personal information;
 - **Deletion** — request deletion of certain personal information;
 - **Opt-out of sale or sharing** — opt out of sale or cross-context behavioural advertising sharing;
 - **Opt-out of ADMT** — opt out of automated decision-making technology producing significant decisions about you; and
 - **Non-discrimination** — no discriminatory treatment for exercising any privacy right.
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E HOW TO SUBMIT A REQUEST

To submit an access, correction, or deletion request, use our online form at goneke.com or call 1-800-262-8408. You may opt out of the sale or sharing of your personal information using the “Do Not Sell or Share My Personal Information” link on our Sites, or the Global Privacy Control signal. To submit a request as an authorised agent on behalf of a consumer, contact privacyqueries@goneke.com.

F VERIFYING REQUESTS

To help protect your privacy and maintain security, we will take steps to verify your identity before granting access to your personal information or complying with your request. We may require you to verify your e-mail address or provide certain information in our records. To the extent permitted by law, we may charge a reasonable fee to comply with your request.