

## PROTECTION OF PERSONAL INFORMATION ACT PRIVACY STATEMENT

Bateleur Capital (Pty) Ltd ("Bateleur") as an authorised discretionary financial services provider is obliged to comply with the provisions as set out in the Protection of Person Information Act, 4 of 2013 ("POPIA").

Bateleur is committed to ensuring that all personal information, as defined, will be collected, processed and distributed in accordance with the data protection requirements as stipulated in the POPIA.

#### PERSONAL INFORMATION

The type of information we will collect from our clients will only be the information required for the fulfilment of rendering our services to that client. Any statistical, general, anonymous or any other information collected that on its own cannot identify a specific individual is not considered as personal information as defined in POPIA.

Any updates of personal information or requests to view personal information can be sent to <a href="mailto:legal@bateleurcapital.com">legal@bateleurcapital.com</a>

For access to Bateleur PAIA manual please click here <a href="https://bateleurcapital.com/wp-content/uploads/2021/05/PAIA-Manual\_December-2020.pdf">https://bateleurcapital.com/wp-content/uploads/2021/05/PAIA-Manual\_December-2020.pdf</a>

#### CONSENT

Bateleur will only process your personal information where you have provided us with your express consent or where it is required or permitted by law or regulation.

Personal information will be collected by Bateleur either directly from the data subject or from a third party or a publicly accessible source.

## PROCESSING OF INFORMATION

Bateleur processes personal information in the normal course of business and for lawful purposes to provide investment management services as agreed in terms of lawfully executed investment mandates.

Personal information will only be used for the identified purpose for which it was collected.

Personal information collected and retained by Bateleur is done in accordance with our POPIA policy and in compliance with POPIA.

#### **INFORMATION SECURITY**

Bateleur has taken all reasonable measures, in compliance with POPIA, to secure and maintain the confidentiality of all personal information, which includes the implementation of IT policies dealing with the methods of securing and maintaining the confidentiality of personal information.

# **SERVICE PROVIDERS**

Bateleur makes use of specific service providers for the purpose and completion of the investment management services provided and the continuity of its business operations. To this end we will endeavour to have agreed upon security controls in place when we are required to distribute any or all personal information.

## **CONTACT**

You may contact the information officer at: Tel: (+27) 21 681 5060 or Email: <a href="legal@bateleurcapital.com">legal@bateleurcapital.com</a> if you have any questions or queries regarding the POPIA policy or this statement.