

## PROCESSING OF PERSONAL INFORMATION

### Privacy and Security

ClucasGray Asset Management takes your privacy and the protection of your personal information very seriously. We will only use your personal information in accordance with applicable data protection legislation.

We have implemented reasonable operational measures to keep your personal information secure.

By signing our Application Forms and Mandate, you consent to us processing your personal information.

### Information which we may collect about you

We may collect the following information about you:

- Your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information;
- Information about your beneficial owner and any related parties (if applicable)
- Records of correspondence or enquiries from you or anyone acting on your behalf;
- Details of transactions you carry out with us;
- Details of contracts you carry out with us;

We may require you to provide additional personal and tax-related information, in order for us to meet our legal or regulatory obligations

Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to ClucasGray Asset Management and how their data will be processed.

### Use of Information Collected

We may use, transfer and disclose your personal information for the purposes of:

- Providing you with the services and products you have requested;
- Processing your personal information for ordinary business purposes (this includes opening and maintenance of your investments, and maintaining our overall relations with you).
- Managing your investments;
- Complying with your instructions;
- Complying with Applicable Laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;

### Retention of your information

We will retain your information in accordance with retention periods set out in Applicable Laws, unless we need to retain it for longer for a lawful purpose.

### Access to, correction and deletion of your personal information

You may request details of personal information which we hold about you under the Promotion of Access to Information Act 2 of 2000 ("PAIA").

You may request the correction of personal information we hold about you. Please ensure that the information we hold about you is complete, accurate and up to date.

### Complaints

Should you believe that we have processed your personal information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with us.

If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

Tel: 012 406 4818

Fax: 086 500 3351

Email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)