

## Investorsense Privacy Policy

### 1. INTRODUCTION

- 1.1. Investorsense respects your privacy, and we are committed to keeping your personal information secure and confidential.
- 1.2. This privacy policy explains how we process the personal information we collect from you and informs you of your rights in terms of the Protection of Personal Information Act, Act No. 4 of 2013 (“POPIA”). You have the right to be notified that your personal information is being collected, which is why this privacy policy has been brought to your attention and is important to you.
- 1.3. Investorsense may amend the provisions of this privacy policy to comply with any changes in the law, and/or according to any changes to its information processing activities or privacy practices. Such amendments will be published on the website and will become operable from the date of such publication.
- 1.4. This privacy policy, and the interpretation and enforcement thereof, will be governed by the laws of the Republic of South Africa.
- 1.5. The provisions of this privacy policy are, as far as possible, incorporated into any agreement between Investorsense and you.
- 1.6. By accessing and using this website and/or our services, you are providing your express and voluntary consent to the processing of your personal information by Investorsense on the basis set out in this privacy policy. If you do not consent, you must immediately stop accessing and/or using this website and our services.

### 2. RESPONSIBLE PARTY

- 2.1. Investorsense will be the party who will be collecting and processing your personal information and as such is designated as the “responsible party” for this policy.
- 2.2. Investorsense’s contact details are as follows:  
  
Email: [erika@investorsense.co.za](mailto:erika@investorsense.co.za)  
Website address: [www.investorsense.co.za](http://www.investorsense.co.za)
- 2.3. Investorsense may instruct third party operators from time to time to undertake certain processing activities relating to your personal information.

### 3. WHAT PERSONAL INFORMATION DO WE COLLECT?

- 3.1. Personal information is defined in POPIA and means information relating to an identifiable, living natural person, and where it is applicable, an identifiable, existing juristic person. We “process” your personal information if we collect, use, store, make available, destroy, update, disclose, receive or otherwise deal with your personal information.

3.2. The supply of personal information to Investorsense is voluntary and not mandatory. However, if you refuse to supply any personal information, certain consequences may naturally flow from such a refusal, such as preventing Investorsense from concluding or performing any contract with you.

3.3. Depending on the type of business we conduct with you or the relationship you have with us, we may process the following types of personal information:

- name
- designation
- company you represent
- physical work address
- work telephone number
- cell phone number
- email address

4. FOR WHAT PURPOSE DO WE COLLECT PERSONAL INFORMATION?

4.1. Investorsense shall only collect your personal information for a specific, explicitly defined and lawful purpose relating to a function or activity of Investorsense's business.

4.2. Such purposes may include the following:

- 4.2.1. to enter into a contract with you;
- 4.2.2. to perform any obligations under a contract with our clients, for example, we collect your information to keep you informed about invitations and financial results announcements specifically about our clients with whom you have had dealings before;
- 4.2.3. to protect a legitimate interest of yours (unless you have specifically objected in writing to all or some of the processing activities on reasonable grounds);
- 4.2.4. to pursue its legitimate interests or the legitimate interests of a third party who it is sharing the information with (unless you have specifically objected in writing to all or some of the processing activities on reasonable grounds);
- 4.2.5. to customise and display content to you in a way that Investorsense feels may interest you or be most beneficial to them.

4.3. Your information will not be used for any form of marketing or promotion.

5. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

5.1. Directly from you: Some of the personal information we collect, we get directly from you or your company in the form of a written request to be added to the database of a specific client for communication only concerning that client.

5.2. From third party sources: We also collect the personal information we obtain from third party sources. This may include, but is not limited to:

- 5.2.1. Webcast service providers after your participation in a webcast hosted by one of our clients;
- 5.2.2. Conference call service providers after your participation in a conference call hosted by one of our clients;
- 5.2.3. Investor conferences where you attended a presentation or meeting hosted by one of our clients; and

5.2.4. Investor roadshows, hosted by one of our clients

## 6. SHARING OF YOUR PERSONAL INFORMATION

We will only ever share your information with the client on whose behalf we are managing the database. This is the only instance in which sharing your information will be considered unless such information has been permanently de-identified.

## 7. COOKIES

7.1. "Cookies" are small text files transferred by a web server to your hard drive and thereafter stored on your computer. The types of information a Cookie collects includes your username, the date and time of their visits to the website, their browsing history and preferences.

7.2. Investorsense may use Cookies on this website to:

- 7.2.1. distinguish one user from another on the website;
- 7.2.2. remember the user's last session when they return to the website;
- 7.2.3. estimate the website's audience size and usage patterns;
- 7.2.4. store information about the user's preferences, which allows Investorsense to customize the website and content according to your individual preferences; and
- 7.2.5. speed up searches on the website.

7.3. You have the right and ability to either accept or decline the use of Cookies on their computer's web browser, whether you are logged in as a member, or simply casually visiting the website. However, declining the use of Cookies may limit your access to certain features on the website.

## 8. GENERAL CONDITIONS FOR THE PROCESSING OF PERSONAL INFORMATION

- 8.1. Investorsense shall comply with all laws, contracts or regulations when it processes your personal information.
- 8.2. Investorsense shall not act unreasonably when processing your personal information. This means that it will collect and process your personal information in a way that you can reasonably expect, and in a fair way.
- 8.3. Investorsense shall respect your right to privacy at all times. If there is another way in which it can achieve the same goal without posing any risk of harm to your privacy rights, then it will choose that option.
- 8.4. Similarly, if Investorsense needs to process personal information but there are fewer privacy-invasive methods of collecting, using and sharing that information, then it will use those methods.
- 8.5. Investorsense shall ensure that the personal information that is collected and processed is, and remains, relevant to the identified purpose/s for such processing and that such information is, and remains, adequate but not excessive for achieving the identified purpose/s.

- 8.6. If there are any alternative ways to achieve the identified purpose/s without processing personal information, Investorsense shall not process that personal information.
- 8.7. Investorsense shall ensure that the processing activities it chooses to apply are proportionate to achieving the identified purpose/s and that no less privacy-invasive measures are available to achieve the same purpose/s.
- 8.8. Investorsense shall ensure that, regardless of the stated purpose/s for processing personal information, your rights and interests will not be unnecessarily prejudiced or infringed, unless it cannot be avoided, and then in such cases, it shall ensure that its rights and/or interests justify such prejudice or infringement taking place.
- 8.9. If Investorsense no longer needs to process personal information to achieve the purpose originally specified, it will stop using that information.

## 9. YOUR RIGHTS AS A DATA SUBJECT

- 9.1. You have the right to have your personal information processed under the conditions for the lawful processing of personal information as set out in POPIA. You also have the rights as set out below which we need to make you aware of.

### Right of Access

- 9.2. In terms of section 23 of POPIA, you are entitled to request us to:
  - 9.2.1. confirm whether we hold personal information about you,
  - 9.2.2. provide a record or a description of the personal information we hold, including information about the identity of all the third parties, or categories of third parties who have or have had, access to the personal information.

### Right to request correction or deletion

- 9.3. You may request us, in terms of section 24 of POPIA, to correct or delete personal information in our possession or under our control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully. You may also request us to destroy or delete a record of personal information about you that we are no longer authorised to retain.
- 9.4. We will as soon as reasonably practicable correct, destroy or delete, as the case may be.

### Right to object to processing

- 9.5. You may object at any time to the processing of your personal information through unsolicited electronic communication.
- 9.6. You may lodge a complaint with the Information Regulator (<https://justice.gov.za/inforeg/>).

## 10. HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?

- 10.1. We will only keep your personal information on our records for as long as we need it to communicate to you on behalf of our client. If it is no longer necessary for the purpose for which it was shared, it will be destroyed.

## 11. SECURITY SAFEGUARDS

- 11.1. Investorsense is committed to protecting the personal information in its custody against any loss of, damage to or unauthorised destruction of that information, and to prevent any unauthorised parties from accessing that information.
- 11.2. Investorsense takes steps to continually identify and document any risks to the personal information it has in its possession or under its control and that appropriate security safeguards are in place against those risks.
- 11.3. Investorsense shall ensure that any contracts entered into with third party operators who process personal information on Investorsense's behalf, include the following obligations:
  - 11.3.1. the operator shall not process any personal information without Investorsense's knowledge and authority;
  - 11.3.2. the operator shall treat all personal information given to it as confidential and shall not disclose it to any unauthorised third parties;
  - 11.3.3. the operator shall establish and maintain adequate security measures which are the same or offer similar protection over the personal information as that employed by Investorsense;
  - 11.3.4. the operator shall notify Investorsense immediately where there are reasonable grounds to believe that any personal information has been leaked to or accessed by any unauthorised person;
  - 11.3.5. if the operator is situated in another country, it must comply with the data protection laws in that country and be able to verify that it is so compliant;
  - 11.3.6. if an operator is legally obliged to disclose any personal information processed by them on Investorsense's behalf to other parties, it must notify Investorsense beforehand to enable Investorsense and/or individual Users to protect their rights if necessary.

## 12. SECURITY BREACHES

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Your information is stored in an internet-based platform where it is password protected. In the event of a security compromise where your personal information has been accessed or acquired by an unauthorised person, we will notify you directly as soon as possible, as provided for in POPIA. Investorsense shall provide sufficient information to allow you to take the necessary protective measures against the potential consequences of the compromise or shall advise you of the steps to be taken by them and the possible consequences that may ensue from the breach for them.

## 13. RETURNING, DESTROYING OR DELETING PERSONAL INFORMATION

- 13.1. Where Investorsense is no longer authorised to retain a record of any personal information, it shall either:
  - 13.1.1. ensure that the information is permanently destroyed or deleted as soon as reasonably practicable; or
  - 13.1.2. return the information to the User or transfer it to a third party, if requested by you in writing to do so.

## 14. CONSENT

- 14.1. You hereby consent to the processing of your personal information in terms of the provisions of this privacy policy.
- 14.2. You acknowledge and agree that such consent has been given voluntarily after you have read and understood the provisions of this privacy policy, in particular, regarding the following:

- 14.2.1. the types of personal information to be processed;
  - 14.2.2. the specific processing activities to be undertaken;
  - 14.2.3. the specific purpose/s for such processing; and
  - 14.2.4. the possible consequences for the User that may arise from such processing.
- 14.3. Should you wish to withdraw any consent previously given, you must notify Investorsense's information officer in writing.

15. GENERAL

As the first point of contact if you have any concerns with regards to the contents of this policy or any personal information shared with us, please contact our Principal Information Officer, Erika Venter at [erika@investorsense.co.za](mailto:erika@investorsense.co.za), who will assist and investigate any request or complaint you make about these issues.