

NOTICE: PROTECTION OF PERSONAL INFORMATION

Rezco comprises of a group of companies incorporated to carry on business in the South African financial services industry. Rezco Asset Management (Pty) Ltd (RAM), the holding company, is the sole shareholder of two operating subsidiary companies, namely:

- Rezco Investment Counsel (Pty) Ltd, a financial service provider registered in terms of Financial Advisory and Intermediary Services Act 37 of 2002; and
- Rezco Collective Investments Ltd, a collective investment scheme registered in terms of Collective Investment Schemes Control Act 45 of 2002.

In the course of carrying on its business and rendering services to the South African public Rezco processes personal information, either in terms of applicable laws or another legitimate basis.

Rezco is committed to ensuring the protection and security of personal information garnered in the course of it carrying on business. To provide an overview of Rezco's policy on the protection and processing of personal information, we have set out this Notice to provide you with information about:

- Purpose of processing personal information;
- How personal information is used;
- Who is personal information shared with;
- How long is personal information kept;
- Security of personal information; and
- Your rights in respect of your personal information.

By using this site, you agree to the terms of this Notice, and consent to the collection, processing, further process and storage of your personal data processed through use of this website. Please note that any personal information acquired from you in the use of this website will be protected and secured in accordance with Rezco policy on protecting and processing personal information.

Purpose of processing

Rezco collects and processes personal data:

- In compliance with legal obligations in terms of the Financial Intelligence Centre Act 38 of 2001 as amended, Foreign Account Tax Compliance Act and Common Reporting Standards;
- For purposes of complying with our duties and exercising our rights under the terms of investment management agreements with clients and/or their representatives;
- In pursuit of legitimate interests, which include:
 - sending relevant/legally required communications/materials to clients or interested parties;
 - marketing of Rezco's funds and investment philosophy to parties to have requested/are required to be kept updated in respect of Rezco's products and investment decisions;
 - understanding behaviour, preferences, and needs of clients, potential investors or other interested parties who access our website;
 - complying with legal and regulatory obligations in terms of applicable laws and industry requirements;
 - preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
 - handling queries, complaints or disputes;
 - managing relationships clients and/or their representatives;
 - managing any claims or enforcement actions taken against Rezco;
- Managing subscriptions to Rezco newsletters and marketing material as well as other data dissemination arrangements.

Rezco does not, nor does it intend to, collect or process special personal information i.e. religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information. Any information that incidentally become apparent to Rezco in the course of collecting and processing the information in relation to the uses above will be treated in accordance with Rezco's personal information protection framework and applicable legal prescripts.

How Rezco uses personal information

Rezco does not use personal information for any reason other than as required for purposes of compliance with the law or the pursuit of legitimate interests, subject to the legitimacy of processing being scrutinized and, where relevant, consent being obtained. In general, Rezco uses personal information:

- to comply with anti-money laundering and counter terrorist financing monitoring and reporting obligations;
- to comply with regulatory and/or reporting obligations in terms of applicable laws;
- to comply with audit requirements;
- to manage and record interactions with clients, potential investors and other interested parties via “live chat”, email or telephone for quality assurance purposes and the protection of its rights;
- for further processing in accordance with agreements with service providers contracted to render services.
- verify investor details/identity for crime and fraud prevention, detection and related purposes;
- to manage investor accounts and relationships with “key decision makers” of flows into the funds;
- to manage relationships with service providers and their representatives;
- for historical, statistical and research purposes.

All personal information, in addition to being processed in accordance with Rezco’s policy, is treated with the strictest confidence. Maintenance of confidentiality and compliance with Rezco’s policy are conditions of employment for all staff. Rezco will not sell personal information, nor will it exchange or process personal information with/to any third party for any purpose other than as provided for in Rezco’s policy on processing personal information.

Sharing personal information

Rezco may share your personal information in accordance with legal requirements to facilitate the carrying on of its business, which includes making relevant personal information available to third party service providers. We ensure our service providers are only provided with the personal information to the extent of the services they have been contracted to render. Additionally, Rezco imposes contractual obligations relating to the protection of personal

information shared to the extent that the data can only be used to provide services to Rezco in accordance with the service agreement.

Other third parties with whom Rezco may share personal information are governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so:

- to comply with our legal obligations;
- to exercise/protect our legal rights; and
- for the prevention, detection, investigation of crime or prosecution of offenders.

How long is personal information kept

Personal information will be retained for the applicable period having regard for:

- legislative/regulatory requirements;
- reporting/accounting obligations;
- the purposes for which the personal information was collected;
- in order to establish or defend legal rights or obligations; and/or
- as required by data protection laws.

Security of personal information

The security measures employed by Rezco to ensure the protection of personal information pertain to:

- regular assessments of all the levels of protection provided by Rezco's IT and cybersecurity service provides and the adequacy thereof in respect of threats detected;
- penetration testing of systems;
- security controls which protect the Rezco's infrastructure from external attack and unauthorised access; and
- internal policies setting out our data security approach and training for employees;
- restriction of access to the types of data in Rezco's filing system to ensure that staff is restricted to the personal information they require access to towards carrying out their duties only; and
- the encryption of data;

Your rights in respect of your personal information

Any person, in respect of his/her/its personal information, has the right:

- to obtain, free of charge, confirmation from Rezco whether it holds any personal information about the person;
- to instruct the transmission of personal information held by Rezco to another designated party;
- to request from Rezco a record/copy of the personal information, in a readable format, held by Rezco, including information and identity of all third parties/category of third parties who had access to their personal information, subject to the provisions of Promotion of Access to Information Act 2 of 2000;
- in certain circumstances, to object to the processing of personal information;
- in certain circumstances, correct or delete any personal information in Rezco's possession or under its control; and
- in certain circumstances, destroy or delete a record of personal information.

Complaints

Any person who feels their rights in respect of their personal information has been infringed may submit a complaint to the Information Regulator.

For more information

For more information, please email us at info@rezco.co.za