

WEBSITE PRIVACY & COOKIE POLICY

This website privacy & cookie policy ("**Policy**") is effective as of 1 July 2021.

PLEASE READ THIS PRIVACY NOTICE CAREFULLY. IF YOU ARE CONCERNED ABOUT ANY ASPECT OF THIS POLICY AS IT RELATES TO YOUR PERSONAL INFORMATION, PLEASE DO NOT CONTINUE TO ENGAGE WITH US, USE OUR WEBSITE OR OUR SERVICES.

This Policy describes how PSG Capital Proprietary Limited ("**PSG Capital**", "**we**" or "**us**") deals with personal information, including why we collect such personal information, what personal information we collect, and what we do (and do not do) with it.

This Policy applies when you visit our website and the PSG Capital client portal, as well as any app, blog or associated microsites which may be launched in future (collectively, "**the/our website**"). Please read this Policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your personal information, collected via our website.

This Policy must be read together with PSG Capital's website terms of use accessible here: <http://www.psgcapital.com/terms-of-use> together with any other documents or agreement between PSG Capital and you.

Who is responsible for processing your personal information?

PSG Capital is the "responsible party" (i.e. the organisation responsible) for all personal information that is collected and used for the purposes of data privacy laws, principles and regulations which may apply to you, including the Protection of Personal Information Act, No. 4 of 2013 ("**POPIA**") and any other data protection laws (collectively, "**Data Privacy Law**").

This Policy does not apply to the processing of personal information by other third parties relating to or by means of other parties' websites, products, or services, such as websites linked to, from or advertised on our website or through our products and services, or sites which link to or advertise our website or our products and services. We are not responsible for the privacy practices of such third parties or third-party websites, or for any claims, loss or damage arising from these.

What personal information do we collect from the people that visit our website?

"**Personal information**" has the meaning given in the Data Privacy Law applicable to you, and, in terms of POPIA, refers to any information about an identifiable living natural person or, where applicable, an identifiable existing juristic person.

You are not required to provide any personal information on the public areas of this website. However, you may choose to do so by accessing our website, accepting the cookies, completing application forms (where relevant) on our website; by contacting us regarding our services or by making contact in respect of any questions you may have about this Policy.

Specifically, we may either directly or indirectly collect the following categories of personal information from you when you visit or make use of our website:

- first and last names, email address and other contact details;
- information you provide about yourself and any preferences;
- communications with us or directed to us via letters, emails, calls, and social media; and
- your location where the IP address of your computer or device is used to determine your geographic location so that we can customise your experience on the website.

Our website and our services are not targeted at children. We will not knowingly process the personal information of people under the age of 18 without express consent from a parent or guardian to do so.

Lawful basis

We will limit the types of personal information we process to only that to which you consent and which is necessary for our legitimate business interests. Through your use of our website, we wish to balance our legitimate business interests and your reasonable expectation of privacy. Accordingly,

we will take appropriate and reasonable technical and organisational steps to prevent unauthorised access to, or disclosure of your personal information. In limited instances, we will request your express consent prior to processing certain categories of personal information.

We may also process your personal information where it is necessary to perform in terms of a contract with you or when it is necessary for us to comply with a legal or regulatory obligation.

How do we use your personal information?

Where applicable, we may use the personal information we collect from you in the following ways:

- To personalise your user experience, for example in respect of the PSG Capital client portal
- To improve our website in order to better serve you
- To allow us to provide better service in responding to client requests
- To send periodic emails regarding services

When and how we collect data

We process your personal information from you when you browse our website, register on our website or enter information on our website.

We also use a tool, called "cookies", that allows us to track users of our website. This tool captures both your IP address, as well as your location (country). Please refer to the section below 'Do we use cookies?' for more information.

How long do we store your personal information?

We will not retain your personal information longer than is necessary to achieve the purpose for which the information was collected and processed, unless we are required to do so by law, there is another lawful purpose to retain your information for a longer period, we reasonably need it for lawful purposes related to the performance of our functions and activities or you agree to us retaining it for a specified further period.

How do we protect your information?

Our website is scanned from time to time for security weaknesses and known vulnerabilities in order to make your visit to our site as safe as possible. We also use regular malware scanning.

Your personal information is held on secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.

Direct marketing

We may process your personal information for the purpose of direct marketing if (i) you have specifically consented (or "opted in") to receive such communication; or (ii) you are an existing client of ours.

If you complete any "contact us" field on our website, you agree to receive marketing communication from us. You can, at any time, opt-out or reject such communication.

Do we use 'cookies'?

Yes. We use session cookies, persistent cookies and third-party cookies.

What are cookies?

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you allow it).

Session cookies, which are used in connection with our general website (i.e. excluding the PSG Capital client portal) allow you to be recognised when you browse our website. Session cookies are

not stored on your hard drive, but are rather kept in active memory. Session cookies are temporary and are deleted when your session closes, or after a period of inactivity.

We use persistent (localised) cookies in connection with the PSG Capital client portal. These cookies are used to identify you over multiple independent sessions typically if you have agreed for the website to "Remember Me" or "Keep Me Logged In".

Third party cookies are not created by the PSG Capital website, but are created by other third parties. These types of cookies are used for advertising, retargeting and tracking purposes.

Why do we use cookies?

It enables the site or service provider's systems to recognise your browser and capture and remember certain information. For instance, cookies are used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. Where applicable, we use cookies to:

- Understand a user's preferences
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf

How can you manage cookie preferences?

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You can do this through your browser (like Internet Explorer, Chrome or Firefox) settings. Each browser is somewhat different, so look at your browser's help menu to learn the correct way to modify your cookies.

If you turn cookies off, some features will be disabled and some of our services may not function properly.

Third-party links

We do not include or offer third-party products or services on our website.

Third-party disclosure: sharing personal information

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information unless we provide you with advance notice. We may, however, disclose your personal information to the following third parties:

- group companies of PSG Capital;
- website hosting partners and other third parties who assist us in operating our website, conducting our business, or servicing you;
- our professional advisors;
- judicial, regulatory and law enforcement bodies (when required by law to do so);
- any third party (and the third party's advisors) that has approached us and expressed an interest in or will acquire all or part of our assets or shares, or that succeeds us in carrying on all or part of our business, whether by merger, acquisition, restructure or otherwise.

We will ensure that all the above-mentioned third parties agree to keep your personal information confidential.

We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect our or others' rights, property, or safety.

Non-personally identifiable visitor information (or 'de-identified' information) may be provided to other parties for marketing, advertising, or other uses.

Your Rights in respect of your personal information

In terms of Data Privacy Laws, you have certain rights including, without limitation:

- **Access rights:** You have the right to request a copy of any record of your personal information held by us.
- **Right to rectification:** You can require us to have inaccurate personal information corrected.
- **Right to object:** You have the right to object to the processing of your personal information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law.
- **Right to erasure:** You can require us to erase personal information in certain circumstances where there is no lawful basis for us to retain such personal information. Please note, however, that in some instances we must retain your personal information for certain periods of time as required by law.
- **Right to restrict:** You can require us to restrict our processing of your personal information in certain circumstances.
- **Right to withdraw consent:** You can withdraw any consents to processing that you have given us and prevent further processing if there is no other legitimate ground upon which we can process your personal information.
- **Right to complain:** You can raise a complaint about our processing with the data protection regulator in your jurisdiction, or with our Information Officer.
- **Reject cookies:** You can reject the use of cookies by changing your browser settings or clicking "reject" when you first enter our website.

You also have a duty to inform us of changes to your personal information: It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Right to lodge a complaint

You have the right to complain to the relevant regulator, if you believe that the processing of your personal information by PSG Capital is in breach of the applicable Data Privacy Laws, with the contact information of the South African Information Regulator being provided below:

- JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- <https://inforegulator.org.za/>
- POPIAComplaints@inforegulator.org.za

Responsible Party

The responsible party for the data collection in terms of this Policy is:

PSG Capital Proprietary Limited

Registration number: 2006/015817/07

Address:

1st Floor, Ou Kollege Building, 35 Kerk Street, Stellenbosch, 7600

(PO Box 7403, Stellenbosch, 7599)

and

Suite 1105, 11th Floor, Sandton Eye Building, 126 West Street, Sandton, 2196

(PO Box 650957, Benmore, 2010)

Email: informationofficer@psgcapital.com

Contacting us

If there are any questions regarding this Policy, you may contact us using the information above.

Changes to this Policy

We reserve the right to amend and update this Policy from time to time and in our sole discretion, without notice, provided that when we do so we will post the revised version of this Policy on our website. If you continue to engage with us or access or use our website after the amendments are

made to the Policy and displayed on our website, you will be deemed to have accepted the revised Policy.