

# Privacy Notice

## Contrarius

The Contrarius Group Companies ("Contrarius", "us" or "we"), understand that your privacy is important to you. Contrarius may process your personal data in their capacity as 'data controllers'. We are committed to respecting your privacy and protecting your personal data. This Privacy Notice ("Privacy Notice") describes how Contrarius collects, uses, discloses and protects your personal data, and your rights in relation to the personal data it holds.

The funds for which CIML is the appointed investment manager may have their own privacy notices, which set out how each fund and its delegates and their affiliates collect, use, disclose and protect the personal data of investors and potential investors in the fund. The relevant funds' privacy notice can be accessed on the Contrarius website.

Contrarius will process your personal data in accordance with this Privacy Notice, unless such processing conflicts with the requirements of applicable law, in which case, applicable law will prevail. We may amend this Privacy Notice from time to time, to reflect any changes in the way that we process your personal data. This Privacy Notice supersedes any previous version of it which you may have had sight of.

By submitting your personal data to us, you acknowledge that:

- You have read and understood this Privacy Notice and agree to the use of your personal data as set out herein.
- Your personal data may be transferred and processed worldwide, including countries that may not be deemed to provide the same level of data protection as your home country, for the purposes and in the manner specified in this Privacy Notice.
- All of your representations made when agreeing to the terms of use of the website to establish a user profile for the website are true and correct to the best of your knowledge and belief.

### What information do we collect?

You are not required to provide any personal information on the public areas of the website; however, you may choose to do so in order to register a user profile to obtain access to certain parts of the website or when contacting us.

Contrarius may collect a range of information about you. This could include:

- Contact information including first name, last name, telephone and fax numbers, e-mail address;
- Personal characteristics such as date of birth and country of birth;
- Government-issued Identification such as passports, national identity cards or tax identification numbers;
- Where you have been granted access to protected parts of our website, your log in information;
- In addition to the information you knowingly provide, we may collect certain technical information, including your Internet Protocol (IP) address used to connect your computer to our website. An IP address is an assigned number similar to a telephone number, which allows your computer to communicate over the internet.
- Data from third parties during the investment process. This may include fraud and anti-money laundering ("AML") checks, know your customer ("KYC") screening and checks required due to sanctions and anti-terrorism laws.

This list is not exhaustive and Contrarius may collect more personal data where it is required.

Sensitive personal data is a subset of personal data and includes ethnicity, health, trade union membership, philosophical beliefs, sexual orientation, as well as other categories as prescribed by law. We do not seek to obtain such data unless permitted to do so by applicable laws.

### Why does Contrarius process personal data?

We collect and use your data in order to provide our services to you, to communicate with you about them, to comply with our legal obligations or when necessary for the purposes of our legitimate interests in effectively managing our business operations.

### Who has access to data?

Your personal data may be shared within the Contrarius Group or with certain third parties for the purposes set out above. We maintain processes designed to ensure that any processing of personal data by the Contrarius Group entities or third party

service providers is consistent with this Privacy Notice and protects the confidentiality, availability, and integrity of your personal data.

In addition, Contrarius and/or the third parties may be required to disclose your personal data to the extent required by relevant regulatory, tax or foreign exchange authorities or law enforcement officials.

We will not sell your personal information or share it with third parties for use in marketing their products and services.

### **We may transfer your personal data outside the European Economic Area**

Contrarius maintains physical, electronic and procedural safeguards to protect your non-public personal information. Even though we have taken significant steps to ensure that your personal information is not misused, you should know that we cannot fully eliminate security risks associated with personal information. The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be processed by individuals operating outside of the EEA who work for the Contrarius Group. This could include transfers of personal data to Jersey, Bermuda, Australia, South Africa, the UK and the USA. Certain countries may have different data protection standards to those which apply in the EEA. Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA in compliance with data protection law.

### **How does Contrarius protect data?**

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

### **For how long does Contrarius keep data?**

The retention period will be determined by the purpose for which we are using your personal data and any laws or regulation that may set a minimum or maximum period for which we have to keep your personal data.

### **Your rights**

As a data subject, you have a number of rights.

You can:

- access and obtain a copy of your personal data on request;
- require Contrarius to change incorrect or incomplete data;
- require Contrarius to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

You can find out more about your rights under data protection legislation at <https://jerseyoic.org/>.

If you would like further information on how Contrarius uses your personal data, the exercise of any of the rights listed above or have a complaint, you may contact [privacy@contrarius.com](mailto:privacy@contrarius.com).

This updated Privacy Notice is effective 30 June 2025. If we change it, we will post a new version to: <https://www.contrarius.com/InvestWithUs/Policies>

## **Cookies Policy**

### **What are cookies?**

A cookie is a small piece of data (file of letters and numbers) that a website asks a visiting user to store on their device in order to remember information about them. Cookies contain information that is transferred to your computer's hard drive when you first visit a site or page. We use the term "cookies" in this policy to refer to all files that collect information in this way.

### **Why do we use cookies?**

We use cookies on our website to:

- ensure our website functions correctly;
- improve how our website performs;
- tailor our website's functionality based on your device type; and,
- understand our audience to deliver content most relevant to each user.

## What cookies do we use?

The cookies used on our website are based on the following categories:

- Strictly Necessary cookies: These cookies are essential for our website to function and to allow you access to secure areas of our website. They also allow our website to remember choices you make (such as your selected investor country or investor type) to provide enhanced, more personal features.
- Performance cookies: These cookies collect aggregated, anonymous data about how visitors interact with our website. This helps us improve functionality—for example, by ensuring users find content easily. These cookies are only set with your consent. If you do not allow these cookies we will not know when you have visited our website, and will not be able to monitor its performance.

## Third Party Analytics

From time to time, we may use third-party web analytics tools to help us understand user interactions with our website. Third party cookies, such as those from Google Analytics, are used in these instances, which allows us to recognise, measure, and track users of our website. These tools use cookies to track user behaviors such as: pages visited, navigation patterns, interaction data, and device and browser information. These analytics help us improve the design, content, and functionality of our website.

You can read more about how data is used by our third-party providers here:

- Google: <https://policies.google.com/technologies/partner-sites>

## Managing your Cookie Preferences

When you visit our website, you will be presented with a cookie consent banner. You may choose to:

- Accept all cookies; or,
- Allow necessary cookies only.

You can update your choices at any time by clicking on the 'Cookie Setting' link at the bottom of our website pages.

You can also choose to accept or decline the usage of cookies by adjusting your browser settings. Cookie settings typically are found in the 'Options' or 'Preferences' menu of your browser. If you decline the use or prevent the usage of cookies on your browser, you may encounter problems accessing all or parts of our website.

For more information about cookies, including how to set your internet browser up to reject cookies, please visit: <https://www.allaboutcookies.org/>

This Cookie Policy applies to our website, mobile applications and emails, and forms part of our Privacy Notice.

We reserve the right to update this Cookie Policy. Any changes will be posted within this page and become effective immediately. Continued use of our website constitutes your agreement to all such updates. If you require any further information about Contrarius' use of cookies, please contact us at [clientservice@contrarius.com](mailto:clientservice@contrarius.com).