

## Privacy Notice

### Contrarius South Africa

#### Purpose of this document

Contrarius Investment Services (South Africa) (Pty) Ltd ("Contrarius South Africa", "us", "we", or "our") (Registration Number 2009/013634/07) (FSP Number 48937) is a licensed Financial Services Provider with the authority to render discretionary and intermediary financial services to clients in terms of the Financial Advisory and Intermediary Services Act (the Act). We understand that your privacy is important to you. Contrarius South Africa may process your personal data in our capacity as 'data controllers'. We are committed to respecting your privacy and protecting your personal data. This Privacy Notice ("Privacy Notice") describes how Contrarius South Africa collects, uses, discloses and protects your personal data, and your rights in relation to the personal data it holds.

Contrarius South Africa 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.

#### Acceptance

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

- You have read, understood, accepted and agreed to be bound by all of the terms in this Privacy Notice;
- 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;

By accessing and using the Contrarius South Africa website, you are accepting the terms of this Privacy Notice.

You may only send us your personal information or the personal information of another person where you have their permission to do so.

#### 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 South Africa may collect a range of information about you. We may collect this information directly from you, via Cookies, or third-party sources. Information collected 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 South Africa may collect more personal data where it is required.

## Why does Contrarius South Africa process personal information?

We collect and use your personal information 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 your personal information?

Your personal information 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 information 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 information.

Contrarius South Africa will protect your personal information and will not sell, rent or trade your personal information to any person. There will, however, be instances where Contrarius South Africa will have an obligation to share your personal information, which includes the following:

- Should it be requested by any regulatory authority, such as the Financial Sector Conduct Authority, Prudential Authority or Financial Intelligence Centre, exercising its statutory duties;
- Should such disclosure be in the public interest or for a legitimate purpose;
- By an order of court;
- In order to protect the legitimate interests of Contrarius South Africa in exercising its rights or the protection of its reputation and property;
- To fulfil our legal and regulatory obligations in terms of any applicable law;

If it is requested by third parties in terms of the Promotion of Access to Information Act, 2000 ('PAIA') which regulates and sets out the procedure for such a request and under which circumstances such access may be refused. For information on or to access the PAIA manual, as well as the prescribed request form and fees payable should you wish to exercise your right of access to information, please refer to the policies section of our website: [www.contrarius.co.za](http://www.contrarius.co.za).

You further acknowledge that we may disclose your personal information within the Contrarius Group, and you expressly consent to this.

## Transfer of your personal information

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 information that we collect from you may be transferred to, and stored at, a destination outside of the Republic of South Africa. This could include transfers of personal information to Jersey (Channel Islands), Bermuda, Australia, and the United Kingdom. Certain countries may have different data protection standards to those which apply in the Republic of South Africa.

Where we transfer your personal information outside the Republic of South Africa, we will ensure that it is protected in a manner that is consistent with how your personal information will be protected by us in the Republic of South Africa in compliance with data protection law.

## Storage and destruction of your personal information?

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

You have the right to have your personal information processed according to the conditions for lawful processing of personal information as set out in legislation, specifically chapter 3 of the Protection of Personal Information Act, 2013 ("POPIA") and the foreign data protection legislation, which includes the rights of:

- Notification of security compromises;
- Access to your personal information;
- Correction, destruction or deletion of your personal information;
- Objection, on reasonable grounds, to the processing of personal information;
- Not being subject, under certain circumstances, to a decision based solely on the basis of automated processing of your personal information;
- Submission of a complaint to a relevant regulator(s).

- Civil proceedings regarding the alleged interference of the protection of your personal information.

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

You are not obliged to provide us with your personal information where it is requested, but we may be unable to provide, or continue to provide certain products and/or with you if you do not do so. If this is the case, we will inform you.

If you would like further information on how Contrarius South Africa uses your personal information, the exercise of any of the rights listed above or have a complaint, you may contact us at [info@contrarius.co.za](mailto:info@contrarius.co.za).

This Privacy Notice is effective 1 October 2024. If we change it, we will post a new version to our website at [www.contrarius.co.za](http://www.contrarius.co.za).