



**Protection of Personal
Information Act –
Client Privacy Notice**

Introduction

RealFin Capital Partners (Pty) Ltd (“RealCap”) will comply with your constitutional right to privacy and data protection when we process your personal information. This Privacy Notice explains how we use and disclose your personal information, as is required by the Protection of Personal Information Act No. 4 of 2013 (“POPI”).

RealCap and its employees respect your privacy and the protection of your personal information is of the utmost importance to us. We are committed to ensuring that your personal information is collected and used appropriately, transparently and according to applicable law.

Who we are

RealCap was founded in 2012 under the umbrella of the RealFin Group.

Since its inception in August 2003, the RealFin Group has earned a widely acknowledged reputation as a market leader in alternative asset management, advisory and structured financial solutions to the institutional market (pension funds, life companies, asset managers and stock brokers).

By listening to our clients, we took a strategic decision to broaden our alternative asset management service with the sole purpose of making a financial difference in the lives of our investors and formed RealCap.

Although based in Cape Town, South Africa, our client base and product offering is global. Through our counterparties in Switzerland, RealCap offers specialist, global investment management services and products to our high-net worth investors with a focus on sectors and countries where we believe our unique skill set provides us with positive information asymmetry. We also offer confidential and personalised Multi-Family Office services to assist our South African investor families in making informed and educated decisions that will best suit present as well as future family generations. RealCap currently manages assets in excess of ZAR630 million.

Transparency and security form the foundation of RealCap and together with a driven, passionate and committed team of people who are obsessed with perfection and innovation; we are able to offer our investors a truly unique investment management service.

RealCap is an authorised financial services provider – License No. 43784.

What information we collect

We collect and process your personal information mainly to provide you with access to our services and products, to service your account, to improve our services to you, and to inform you of additional services or products that may be of interest to you as well as financial details that may be of interest to you in form of news snippets/ newsletters.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose. Where possible, we will inform you what information you are required to provide to us and what information is optional.

We may collect the following information;

- name
- **contact details:** email, telephone, address etc.
- **demographic information:** birth date, identification number, marital status , nationality etc.
- **history:** employment, financial, educational etc.
- bank account details
- tax identification numbers

Our appointed custodians, FNB Securities (onshore) and Credit Suisse (offshore) may also require additional information from you and they will be subject to the same/ similar privacy regulations as we are subject to.

What we do with the information we gather

We will collect, store, use, disclose and transfer your personal information only for the purposes for which it was collected or agreed with you, for example:

- To provide our services and products to you and to carry out the transaction you requested and to maintain our relationship;
- For identification and verification requirements in terms of the Financial Intelligence Centre Act No. 38 of 2001;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To confirm and verify your identity or to verify that you are the authorised individual to transact on the applicable account for security purposes;
- To our designated custodians in so far as this is necessary in order to service your account, to improve our services to you and to provide you with products you have requested. You acknowledge and agree that you consent to the collection, use and disclosure of such personal information for such purpose. When personal information is so transferred, we will use contractual or other means to ensure that such third party service providers provide privacy protection that is comparable to the protection we provide in accordance with our privacy and security policy;
- We may disclose your personal information to service providers who are involved in the delivery of investment products or services to you from time to time;
- For operational purposes;
- For audit and record keeping purposes;
- In connection with legal proceedings;
- to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us; and
- when it is allowed in accordance with the provisions of POPI..

Ongoing financial services

Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other financial products and services which may be of particular interest to you as well as financial details in form of news snippets/ newsletters.

You may opt out at any time if you don't want to receive any further communications of this nature.

Disclosure of information

We may disclose your personal information to service providers you elect to use as well as our appointed custodians who are involved in the delivery of services or products to you. When personal information is so transferred, we will use contractual or other means to ensure that such third party service providers provide privacy protection that is comparable to the protection we provide in accordance with our privacy and security policy

We may also disclose your information:

- Where we have a duty or a right to disclose it in terms of law, industry codes or public interest;
- Where we believe it is necessary to protect our rights.

Information security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or use of your personal information, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect from you.

We will continuously review our security controls and processes to ensure that your personal information is secure.

Your rights to access and correction of your personal information

You have the right to access the personal information we hold about you. You also have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before providing details of your personal information or making changes to personal information.

You can contact us at the numbers or addresses provided below, and request the information you would like:

Information officer:	Kerry Booth
Telephone number:	+27 21 761 1458
Postal address:	Suite 762, Private Bag X16, Constantia, 7848, Cape Town
Physical address:	Milton's Way, 11 Bell Crescent, Westlake Business Park, Westlake, 7945
Email address:	kbooth@realcap.co.za
Website:	www.realcap.co.za

Definition of personal information

The POPI Act defines personal information as follows;

“personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to-

- (a) Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- (b) Information relating to the education or the medical, financial, criminal or employment history of the person;
- (c) Any identifying number, symbol, email-address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (d) The biometric information of the person;
- (e) the personal opinions, views or preferences of the person;
- (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- (g) the views or opinions of another individual about the person; and
- (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about that person;

Changes to this notice

This privacy policy may be amended from time to time without any notice to you when improvement is required and/or as privacy legislation changes. Please check our website periodically to inform yourself of any changes.

CONTACT US

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