

TRUSTLINK PRIVACY POLICY

Version 1

trustlink
POWERED BY STRATE

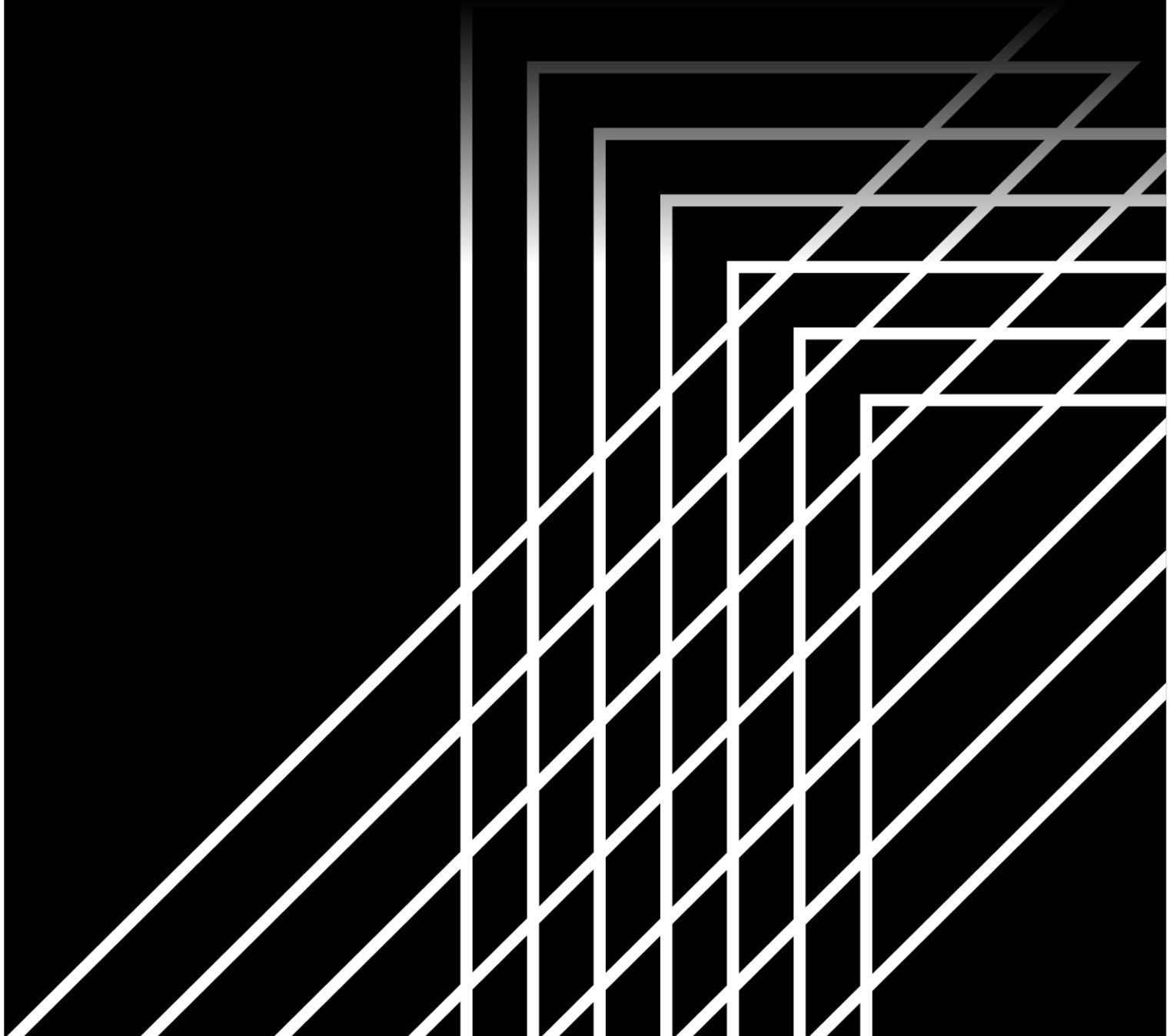


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1. INTRODUCTION

- 1.1 This Policy sets out how your personal information will be used by Trustlink (Pty) Ltd ("Trustlink") and applies to any information, including personal and special personal information, you give to Trustlink or which Trustlink may collect from third parties.
- 1.2 Trustlink acknowledges the need to ensure that Personal Information is handled with care and is committed to ensuring that it complies with the requirements of the Protection of Personal Information Act, 4 of 2013 and any regulations promulgated pursuant thereto ("POPIA" or the "Act").
- 1.3 It is important that you read this Policy carefully to understand our views and practices regarding personal information before submitting any personal information to Trustlink.
- 1.4 By submitting any personal information to Trustlink you agree, and consent to us processing your personal information (including special personal information) as set out in this Privacy Policy ("Policy"). If you do not consent to the provisions of this Policy, or parts of the Policy, Trustlink may not be able to provide its products and services to you.
- 1.5 The provisions of this Policy are subject to mandatory, unalterable provisions of applicable laws.

2. RESPONSIBLE PARTY

Trustlink (Pty) Ltd (registration number: 2003/011462/07) ("Trustlink ", "we", "us" or "our") will be the party who will be collecting and processing your personal information and as such is designated as the responsible party for the purposes of this Policy. Trustlink will instruct operators to undertake certain processing activities relating to your personal information from time to time.

3. PERSONAL INFORMATION WE COLLECT AND RECEIVE

We collect and receive information about you in the following ways:

- 3.1 Information you provide to us
 - 3.1.1 This includes any information that you provide to us directly:
 - when you utilise our services;
 - by filling in Trustlink forms on websites, or those provided to you;
 - when you make a payment in settlement of any fees or invoices;
 - by posting comments or content on our social media pages;
 - when you contact us or we contact you and you provide information directly to us; and
 - information we infer about you based on your interaction with us.

3.2 Information we collect

3.2.1 When you make a payment or are required to be onboarded as a client, you may be required to provide us with the following information –

- title, name and surname;
- physical or registered address;
- contact details and email address;
- identity / passport / registration number;
- company/organisation details;
- constitutional documents;
- information about the relevant shares or bonds;
- information related to your broker or CSD Participant;
- power of attorney;
- SARS registration and compliance status; and
- financial statements or other financial information;

3.3 Information from third-party sources

We may receive additional information about you that is publicly or commercially available and combine that with the information we have collected or received about you in other ways.

3.4 Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. We will process their personal information in accordance with this Policy.

4. LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

4.1 In terms of POPIA, we can only process your personal information where a legitimate basis recognised by POPIA is present. The legitimate bases recognised by POPIA are where -

- 4.1.1 your consent is obtained (or consent of a competent person where the data subject is a child);
- 4.1.2 processing is necessary to carry out the actions for conclusion of a contract to which you are a party;
- 4.1.3 processing complies with an obligation imposed by law on Trustlink;
- 4.1.4 processing protects your legitimate interest(s); or
- 4.1.5 processing is necessary for pursuing the legitimate interests of Trustlink or of a third-party to whom the information is supplied.

4.2 Trustlink will only process personal information where at least one of the legal bases referred to in paragraph 4.1 above is present.

4.3 Where Trustlink is relying on your consent as the legal basis for processing personal information, you have the right to withdraw your consent, and where we rely on legitimate interests, you have the right to object to our processing of personal information at any time. This will not affect the lawfulness of any processing done prior to the withdrawal of consent or any processing justified by a legal ground set out in paragraphs 4.1.2 to 4.1.5 above.

- 4.4 If consent is withdrawn or if there is otherwise a justified objection against the use or the processing of such personal information, Trustlink will use its best commercial endeavours to ensure that personal information is no longer processed. We may, however, not be able to provide products or services to you if access to personal information is limited.

5. USE OF PERSONAL INFORMATION

- 5.1 We use the information we collect and receive for the following general purposes:
- 5.1.1 to provide you with information or services you request from us;
 - 5.1.2 to onboard you onto our internal systems as clients and formulate fee invoices and statements;
 - 5.1.3 to process your settlement of our invoices;
 - 5.1.4 to keep a record of your relationship with us and for administrative purposes (such as our accounting and record-keeping);
 - 5.1.5 in order to refer you to our payment service providers;
 - 5.1.6 to communicate with you;
 - 5.1.7 to conduct sanctions or other due diligence screening in terms of any sanctions and other lists which we may in our sole discretion determine;
 - 5.1.8 to provide you with support;
 - 5.1.9 to verify your identity or the identity of the organisations you represent;
 - 5.1.10 to transfer or process your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use of any of our websites;
 - 5.1.11 to comply with applicable laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
 - 5.1.12 dealing with complaints, procurement purposes, records management, security, employment and related matters; and
 - 5.1.13 for such other purposes authorised in terms of applicable law.

6. PROVISION OF PERSONAL INFORMATION TO THIRD PARTIES

- 6.1 Trustlink may, in the course of providing any services or for purposes listed in paragraph 5.1 above, share certain personal information with third parties who perform certain processing activities on Trustlink's behalf. For example, our holding company Strate (Pty) Ltd ("Strate") for management and administration of our financial obligations and accounting records.
- 6.2 We may share your personal information with the following categories of third parties:
- 6.2.1 our holding company as mentioned in 6.1 above and affiliates;

- 6.2.2 our employees / personnel or directors;
- 6.2.3 third party service providers;
- 6.2.4 business partners;
- 6.2.5 vendors or suppliers; and
- 6.2.5 other parties in response to legal process or when necessary to conduct or protect our legal rights.

7. RETENTION OF PERSONAL INFORMATION

- 7.1 Trustlink will retain personal information for as long as necessary to fulfil the purposes for which that personal information was collected and/or as permitted or required by applicable law.
- 7.2 Trustlink may retain personal information for longer periods for statistical, historical or research purposes, and should this occur, Trustlink will ensure that appropriate safeguards have been put in place to ensure that all recorded personal information will continue to be processed in accordance with this Policy and the applicable laws.
- 7.3 Once the purpose for which the personal information was initially collected and processed no longer applies or becomes obsolete, Trustlink will ensure that the personal information is deleted, destroyed or de-identified sufficiently so that a person cannot re-identify such personal information.
- 7.4 In instances where Trustlink anonymises your personal information for research or statistical purposes (i.e. the information has been de-identified), Trustlink may use such anonymised information indefinitely without further notice to you.

8. HOW TO ACCESS, UPDATE AND DELETE YOUR PERSONAL INFORMATION

- 8.1 Trustlink will take reasonable steps to ensure that all personal information is kept accurate, complete and up to date. Kindly notify Trustlink, in writing, of any updates required in respect of your personal information.
- 8.2 You can request access to your personal information that is held by us at any time. You may also request us to correct your personal information if it is inaccurate or delete the personal information if we are no longer required to retain it by law or for a legitimate purpose.
- 8.3 To protect your privacy and security, Trustlink may request you to provide sufficient identification to permit access to, or provide information regarding the existence, use or disclosure of your personal information. Any such identifying information will only be used for the purpose of verifying your identity before facilitating access to any personal information that we hold about you.
- 8.4 Kindly contact Trustlink's information officer by sending an email to info@strate.co.za to request access to your personal information or the correction or deletion of your personal information.

9. OUR COMMITMENT TO SECURITY

The security of your data is important to us. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. However, we do employ a number of safeguards intended to mitigate the risk of unauthorised access or disclosure of your information. We will use reasonable efforts to protect your personal information and we will use up to date technology that will help us to do this. We will at all times comply with our obligations under applicable law.

10. CROSS BORDER TRANSFERS OF PERSONAL INFORMATION

- 10.1 We are based in and operate from South Africa. Your information, including personal information, may be transferred to and maintained on servers located outside of your country of residence, where the data privacy laws, regulations and standards, may not be equivalent to the laws in your country of residence.
- 10.2 We might transfer your personal information to places outside of South Africa and store it there, where our suppliers might process it. If that happens, your personal information will only be transferred in accordance with applicable laws.
- 10.3 Your use of our services, followed by your submission of information to us, represents your consent to such transfer.
- 10.4 We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.

11. CHANGES TO THIS POLICY

Trustlink will update this Policy from time to time. Any such amendment will come into effect and become part of any agreement you have with Trustlink when notice is given to you of the change by publication on the website of Trustlink at www.trustlink.co.za. We therefore encourage you to review Trustlink's website regularly so that you are aware of any amendments.

12. CONTACT US

- 12.1 All comments, questions, concerns or complaints regarding your personal information or this Policy, should be forwarded to us as follows —

Information Officer

Tel: 011 759 5300

Email: info@strate.co.za

Postal Address: Po Box 78608 Sandton,
Gauteng, 2196

Physical Address: 5th Floor, The Marc Tower 1,
129 Rivonia Road,

Sandown Sandton,

Gauteng, 2196

16.2 If you are unsatisfied with the manner in which we address any complaint regarding Trustlink's processing of personal information, you can contact the office of the Regulator, the details of which are set out below –

Website address: <http://justice.gov.za/infoereg/>

Tel: 012 406 4818

Fax: 086 500 3351

Email: infoereg@justice.gov.za