



Protection of Personal Information Policy

This policy applies to AltInvest (Pty) Ltd trading as AltInvest MultiAsset Fund Management
Registration number: 2006/003340/07
FSP number: 43208
("Altinvest")

Registered office address:
3RD Floor, Letterstedt House, Newlands on Main, Main Road, Newlands 7700, Cape Town

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Document Management

Date	Version	Description	Author
1 September 2014	1.0	First Draft	B Paton
31 July 2015		Application of First Draft	A Kennedy

1 INTRODUCTION

ALTINVEST MULTIASSET FUND MANAGEMENT is a Financial Services Provider and is obliged to comply with The Protection of Personal Information Act ('POPI').

- POPI requires ALTINVEST MULTIASSET FUND MANAGEMENT to inform their clients as to how their Personal Information is used, disclosed and destroyed.
- ALTINVEST MULTIASSET FUND MANAGEMENT guarantees its commitment to protecting their client's privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.
- This Policy sets out how ALTINVEST MULTIASSET FUND MANAGEMENT deals with their client's Personal Information and in addition for what purpose said information is used for.
- This Policy is made available on request at the company's office.
- Section 9 of POPI states that "Personal Information may only be processed if given the purpose for which it is processed, it is adequate, relevant and not excessive."

2 CONTACT DETAILS

Name of body: AltInvest (Pty) Ltd trading as AltInvest MultiAsset Fund Management

Head of body: Anton Turpin (Managing Director)

Information Officer: Anton Turpin

Physical Address: 3rd Floor, Letterstedt House
Newlands on Main
Main Road
Newlands
7700

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Claremont
7735

Telephone Number: +27 21 671 1650

Facsimile Number: +27 86 557 4848

Email address: Anton@MiPlan.co.za

3 THE INFORMATION COLLECTED

We collect and process your personal information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below.

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.

We collect information directly from you where you provide us with your personal details, for example when you purchase a product or services from us or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information.

How we use your information

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

- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For operational purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law (for example to protect ALTIMVEST MULTIASET FUND MANAGEMENT 's interests).

Disclosure of information

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may also disclose your information:

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

Information Security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We may need to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

Your Rights: Access to information

You have the right to request a copy of the personal information we hold about you. To do this, simply send a signed request to our ClientServices team or contact us at the numbers/addresses listed and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

Correction of your information

You have the right to ask us to update, correct or delete your personal information. You may do this by contacting us at the numbers/addresses provided below. We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.

We would appreciate it if you would keep your personal information accurate. Please update your information whenever your details change.

Changes to this Notice

Please note that we may amend this Policy from time to time.

How to contact us

If you have questions about this Notice or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the numbers/addresses provided.

4 APPROVAL

APPROVED BY ANTON TURPIN (DIRECTOR) ON BEHALF OF THE COMPANY ON THE 31st DAY OF JULY 2015.