

AllInvest (PTY) Ltd Privacy Policy in terms of the Protection of Personal Information Act, No. 4 2013 (South Africa)	
Introduction	
Purpose of policy	<p>The purpose of this policy is to enable AllInvest (PTY) Ltd to:</p> <ul style="list-style-type: none"> • comply with the law in respect of the data it holds • protect AllInvest (PTY) Ltd 's staff and other individuals • protect the organisation from the consequences of breach of its responsibilities.
Personal Information	<p>This policy applies to information relating to identifiable individuals, in terms of the Protection of Personal Information Act, 2013 (hereinafter POPI Act).</p>
Policy Statement	<p>AllInvest (PTY) Ltd will:</p> <ul style="list-style-type: none"> • comply with both the law and good practice • respect individuals' rights • be open and honest with individuals whose data is held • provide training and support for staff who handle personal data, so that they can act confidently and consistently AllInvest (PTY) Ltd recognises that its first priority under the POPI Act is to avoid causing harm to individuals. <p>AllInvest (PTY) Ltd will give individuals as much choice as is possible and reasonable over what data is held and how it is used.</p>
Key Risks	<p>AllInvest (PTY) Ltd has identified the following potential key risks, which this policy is designed to address:</p> <ul style="list-style-type: none"> • Breach of confidentiality • Data Subjects not being sufficiently informed • Failure to offer choice about data use when appropriate • Breach of security by allowing unauthorised access • Information up to date
Information Officer Responsibilities	
Scope	<p>The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 1 and Chapter 5, Part B.</p>

Information Officer Responsibilities	<p>The Information Officer has the following responsibilities:</p> <ul style="list-style-type: none"> • Developing, publishing and maintaining a POPI Policy which addresses all relevant provisions of the POPI Act, including but not limited to the following: • Reviewing the POPI Act and periodic updates as published • Ensuring that POPI Act induction training takes place for all staff • Ensuring that periodic communication awareness on POPI Act responsibilities takes place • Ensuring that Privacy Notices for internal and external purposes are developed and published • Handling data subject access requests • Approving unusual or controversial disclosures of personal data • Approving contracts with Data Operators • Ensuring that appropriate policies and controls are in place for ensuring the Information Quality of personal information • Ensuring that appropriate Security Safeguards in line with the POPI Act for personal information are in place • Handling all aspects of relationship with the Regulator as foreseen in the POPI Act • Provide direction to the Deputy Information Officer
Appointment	Anton Turpin has been appointed as the Information Officer with Mark Flagg the deputy information officer.
Processing Limitation	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 2.
Processing Limitation	AltInvest (PTY) Ltd undertakes to comply with the POPI Act, Conditions 2 in terms of processing limitation, sections 9 to 12, subject to the following stipulation (Forms of Consent).
Forms of Consent	AltInvest (PTY) Ltd has various forms of confirming consent at various places of interaction with data subjects. These are set out in detail on www.multiasset.co.za/ disclosures

Nature of Personal Information	AltInvest (PTY) has performed an information audit which will be reviewed periodically for completeness.
Purpose of Specification	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 3.
Purpose Specification	AltInvest (PTY) Ltd undertakes to comply with the POPI Act, Conditions 2 in terms of processing limitation, sections 13 and 14, subject to the following stipulation (Retention periods).
Retention Periods	<p>AltInvest (PTY) Ltd will establish retention periods for at least the following categories of data:</p> <ul style="list-style-type: none"> • Directors • Staff • Investors FAIS & FICA • Suppliers • Service providers <p>Detailed coverage of the relevant retention periods will be documented in line with the Act and any other applicable laws.</p>
Further Processing Limitation	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 4.
Further Processing Limitation	AltInvest (PTY) Ltd undertakes to comply with the POPI Act, Conditions 2 in terms of processing limitation, section 15.
Information Quality	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 5. AltInvest (PTY) Ltd will comply with all of the aspects of Condition 5, section 16.
Accuracy	<p>AltInvest (PTY) Ltd will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:</p> <ul style="list-style-type: none"> • Loading at entry of accurate data. • Data on any individual will be held in as few places as necessary, • updated information about any individual changes are captured or may be updated by the client.

Archiving	Archived electronic records of AltInvest (PTY) Ltd are stored securely. Paper record archiving takes place in AltInvest (PTY) Ltd.'s offices (stored in secure cabinets)
Transparency	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 6.
Transparency	In line with Conditions 6 and 8 of the Act, AltInvest (PTY) Ltd is committed to ensuring that in principle Data Subjects are aware that their data is being processed and <ul style="list-style-type: none"> • for what purpose it is being processed; • what types of disclosure are likely; and • how to exercise their rights in relation to the data.
Procedure	Data Subjects will generally be informed in the following ways: <ul style="list-style-type: none"> • Staff: through this policy • Investors and other interested parties: through various means: www.AltInvest.co.za/ disclosures. • On all application forms • When logging into various electronic communication including the website and software applications, e mails etc
Security Safeguard	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 7, section 19 to 22.
Specific Risks	AltInvest (PTY) Ltd has identified the following risks: <ul style="list-style-type: none"> • Staff with access to personal information could misuse it. • Staff may be tricked into giving away information, either about investors / suppliers or colleagues.
Setting Security Levels	Access to information on the main AltInvest (PTY) Ltd computer system will be controlled by function and data silos set up to limit use. AltInvest (PTY) Ltd will identify security levels required for each record held which contains Personal Information and place additional controls where necessary.
Security Measures	AltInvest (PTY) Ltd will ensure that these controls are in place in terms of access to personal information.
Business Continuity	AltInvest (PTY) Ltd will ensure that adequate steps are taken to provide business continuity in the event of

	an emergency.
Information Security	AltInvest (PTY) Ltd has an Information Security Policy

Data Subject Participation	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 8, sections 23 to 25.
Responsibility	Any subject access requests will be handled by the POPI Act Information Officer in terms of Condition 8.
Procedure for Making Requests	Subject access requests must be in writing. All staff are required to pass on anything which might be a subject access request to the POPI Act Information Officer. Requests for access to personal information will be handled in compliance with the POPI Act and in compliance with the Promotion of Access to Information Act (PAIA).
Provision for Verifying Identity	Where the individual making a subject access, request is not person known to the POPI Act Information Officer their identity will be verified before handing over any information.
Charging	Fees for access to personal information will be handled in compliance with the PAIA Act.
Procedure for Granting Access	Procedures for access to personal information will be handled in compliance with the PAIA Act
Processing of Special Personal Information	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Part B, sections 26 to 33.
Processing of Special Personal Information	AltInvest (PTY) Ltd has the policy of adhering to the process of Special Personal Information which relates to the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life orbiometric information of a data subject. Special personal information includes criminal behaviour relating to alleged offences or proceedings dealing with alleged offences. Unless a general authorisation, alternatively a specific authorisation relating to the different types of special personal information applies, a responsible party is prohibited from processing special personal information.

Prior Authorisation	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Part C, sections 34 and 35.
Prior Authorisation	<p>AllInvest (PTY) Ltd has the policy of adhering to the process of Special Personal Information of children. This applies to individuals under 18 years of age, General authorisation concerning personal information of children only applies where individuals under 18 years of age are involved.</p> <p>AllInvest (PTY) Ltd identify any records held which contain Personal</p>

Direct Marketing, Directories and Automated Decision Making	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Chapter 8.
Direct Marketing	AllInvest (PTY) Ltd undertakes to comply with the POPI Act Chapter 8, sections 69 to 71.
Opting in	Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opportunity to opt in.
Sharing	<p>AllInvest (PTY) Ltd has the policy of sharing s (or carrying out joint or reciprocal mailings) only on an occasional and tightly- controlled basis. Details will only be used for any of these purposes where the Data Subject has been informed of this possibility, along with an option to opt out, and has not exercised this option.</p> <p>AllInvest (PTY) Ltd undertakes to obtain external lists only where it can be guaranteed that the list is up to date and those on the list have been given an opportunity to opt out.</p>
Electronic Contact	Whenever e-mail addresses are collected, any future use for marketing will be identified. Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opportunity to opt in.
Trans-border Information Flows	

Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Chapter 8.
Trans-border Information Flows	AltInvest (PTY) Ltd will ensure that the POPI Act Chapter 9, section 72 is fully complied with. dithiepane (PTY) Ltd will identify Trans border flows which contain Personal Information. Compliance with section 72 will be achieved through the use of the necessary contractual confirmations from the relevant third parties.

Staff Training & Acceptance of Responsibilities

Scope	The scope of this aspect of the policy is written in support of the provisions of the POPI Act, Chapter 5, Part B.
Documentation	Information for staff is contained in this policy document and other materials made available by Information portal MiGateway or staff folder .
Training	AltInvest (PTY) Ltd will ensure that all staff who have access to any kind of personal information will have access to all policies and training material as well as their responsibilities
Ongoing Training	AltInvest (PTY) Ltd will provide staff with POPI issues through training, policies, process and other information.
Procedure for Staff signing acceptance of policies and training	AltInvest (PTY) Ltd will ensure that all staff sign acceptance of policies and training confirmations

Policy Review

Responsibility	The AltInvest (PTY) Ltd Information Officer is responsible for the review of this policy
Procedure	The AltInvest (PTY) Ltd Information Officer will ensure relevant stakeholders are consulted.