

Privacy Statement

This website is owned and operated by Grovest (Pty) Ltd ("Grovest") and will be referred to as "we", "our" and "us" in this Privacy Statement. By using this website, you agree to the Privacy Statement of this website ("the website"), which is set out herein. The Privacy Statement relates to the collection and use of personal information you may supply to us through your conduct on our website.

We reserve the right, at our discretion, to modify or remove portions of this Privacy Statement at any time. We do not make any representations about third party websites that may be linked to the website.

As a trusted guardian of your personal information, Grovest is committed to processing personal information honestly, ethically, with integrity, and always consistent with applicable laws and our privacy commitments.

Your privacy is important to us, just as knowing how we use your information is important to you. We enclose herein a [link to Grovest's Protection of Personal Information Act \("POPIA"\) - POPI Policy](#) which offers visibility of how we collect, use, share and protect your personal information based on your interactions with Grovest, our products and services that you use or subscribe to and how you make use of these products and services.

If for any reason you think that your personal information is not processed in the correct manner, or that your personal information is being used for a purpose other than that for what it was originally intended, you can contact Grovest's Information Officer. You can request access to the information we hold about you through the process outlined in paragraph 6 below at any time and if you think that we have outdated information, request that we update it or correct it accordingly.

Our Information Officer's Contact Details	
Name	Jeffrey Miller
Contact Number	+2711 262 6433
Email Address:	popia@grovest.co.za

Our details:

Grovest (Pty) Ltd
Pinmill Office Park, Building 2
164 Katherine Street
Sandton
2196

1. The source of collection of your personal information

We collect personal information from the following data subjects:

- Prospective clients who enquire about our products and/or services;
- Personal information is collected from you through the completion of a mandate and application form, online forms or questionnaires etc. These forms are completed either electronically or in hard copy. You may also be requested to provide your personal information during your meetings with the respective Representative/s, Key Individual/s and/or Fund Manager/s;
- We may also collect information about you from other sources such as third parties and from cookies on our website.

2. The purpose for processing of Personal Information

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Complying with the obligations contained in the agreement concluded between yourself and Grovest;
- To verify your identity, banking details and tax details (if applicable);
- To administer and provide compliance services to you;
- To notify you of new products and/or services that may be of interest to you;
- To confirm, verify and update your details; and
- To comply with any legal and regulatory requirements.

Some of your information that we hold may include, your first and last name, e-mail address, a home, postal or other physical address, other contact information, your title, birth date, tax number, gender, race, your investments into the various funds that we administer and/or manage, and your banking details.

Failing to provide compulsory information may lead to Grovest's inability to carry out the functions necessary to perform their services to act as an investment opportunity, administrator and/or compliance officer.

3. Legislation authorising or requiring collecting of the personal information:

We are obligated in terms of the following legislation to collect your personal information insofar as it relates to the rendering of the relevant Administration and Compliance services to you:

- Promotion of Access to Information Act 2 of 2000;
- Financial Intelligence Centre Act 38 of 2001;
- Financial Advisory and Intermediaries Services Act 37 of 2002;
- Prevention of Organised Crime Act 121 of 1998;
- Companies Act 71 of 2008;
- Skills Development Act 97 of 1998;
- Protection of Personal Information Act 4 of 2013;
- Income Tax Act 58 of 1962;
- Basic Conditions of Employment Act 75 of 1997;
- Compensation of Occupational Injuries & Diseases Act 130 of 1993;
- Consumer Protection Act 68 of 2008;
- Value Added Tax 89 of 1991;
- Employment Equity Act 55 of 1998;
- Labour Relations Act 66 of 1995;
- Unemployment Insurance Act 63 of 2001;
- Occupational Health and Safety Act 85 of 1993;
- Trademarks Act 194 of 1993;
- Copyright Act 98 of 1978;
- Prevention and Combatting of Corrupt Activities Act 12 of 2004;
- Electronic Communications and Transactions Act 25 of 2002; and
- Electronic Communications Act 36 of 2005.

4. Third parties and your personal information

We may need to share your information to third parties who provide support services that you have requested. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us.

These third parties may include:

- The various regulatory bodies or governmental authorities that Grovest will need to continuously update and adhere to the Companies and Intellectual Property Commission, Financial Sector Conduct Authority, South African Revenue Services and the Financial Intelligence Centre;
- The various third party providers that we work with consultants, company secretaries, auditors and/or compliance officers;
- Analytics and search engine providers assisting in the enhancement of our websites; and

- Information Technology specialists assisting us with data storage, security, processing, analytics, etc.

5. The Transfer of your personal information outside of the Republic of South Africa

Your information may be hosted on servers managed by a third-party service provider, which may be located outside of South Africa. When this happens, we will take all precautions to ensure that the third party will treat your information at a minimum with the same level of protection as required by the POPI Act.

6. Complaints and objections

You have the right to –

- Request that we confirm, free of charge, whether or not we hold personal information about you;
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed, Link to **Annexure A**;
- Request that we consider your objections to the processing of your personal information Link to **Annexure B**); and
- Lodge a complaint with the Information Regulator, Link to **Annexure B**;

7. The Information Regulator

In the event that your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information Regulator. For further information regarding the complaints process, please visit the website of the Information Regulator, as indicated below.

Alternatively, you may contact the Information Regulator for further assistance:

The Information Regulator: Adv Pansy Tlakula

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Email: complaints.IR@justice.gov.za

Website: <https://www.justice.gov.za/inforeg/index.html>

8. Subscription

Subscription to the Grovest newsletter is completely optional. Subscription may include submitting your name, surname and email address, for the option to receive updates and promotional material and other information. You further may elect to unsubscribe at any time.

9. Disclosure

Apart from where you have consented or disclosure is necessary to achieve the purpose for which it was submitted, personal information may be disclosed in special situations where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring, or interfering (intentionally or unintentionally) with our rights or property, users, or anyone else who could be harmed by such activities. Also, we may disclose personal information when we believe in good faith that the law requires disclosure.

We may engage third parties to provide you with services on our behalf. In that circumstance, we may disclose your personal information to those third parties in order to meet your request for these services.

10. Security

We strive to ensure the security, integrity and privacy of personal information submitted to our website, and we review and update our security measures in light of current technologies.

Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure.

However, we will endeavour to take all reasonable steps to protect the personal information you may transmit to us or from our online products and/or services. Once we do receive your transmission, we will also endeavour to ensure its security on our systems.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us. However, we

will not be held responsible for events arising from unauthorised access to your personal information, where we have adequately implemented sufficient security safeguards and conducted ourselves in good faith not to cause harm or act negligently towards your personal information.

11. Collecting Information for Users and Marketing to Users

Link

12. Cookies and Applets

We use cookies to provide you with a better experience. These Cookies and Applets allow us to increase your security by storing your session ID and are a way of monitoring single user access. This aggregate, non-personal information is collated and provided to us to assist in analysing the usage of the website. Kindly look at link set out in clause 11 above.

13. Links to other websites

We provide links to websites outside of our websites, as well as to third party websites. These linked websites are not under our control, and we cannot accept responsibility for the conduct of companies linked to our website. Before disclosing your personal information on any other website, we advise you to examine the terms and conditions of using that Website and the other websites privacy statement. Kindly look at link set out in clause 11 above.

14. Problems or questions

If we become aware of any ongoing concerns or problems with our websites, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our Privacy Statement, or you have a problem or complaint, please [contact us](#).