



External Privacy Policy

Version 3

strate

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1. INTRODUCTION

- 1.1 This Policy sets out how your personal information will be used by Strate and applies to any information, including personal and special personal information, you give to Strate or which Strate may collect from third parties.
- 1.2 Strate 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 Strate.
- 1.4 By submitting any personal information to Strate you provide consent to the processing of your personal information as set out in this External Privacy Policy ("**Policy**"). If you do not consent to the provisions of this Policy, or parts of the Policy, Strate 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. DEFINITIONS

Unless otherwise determined by the context, the words and expressions used in this Policy shall bear the meaning assigned to them below -

- 2.1 "**applicable laws**" means all laws, regulations that Strate is required to comply with;
- 2.2 "**child**" means a natural living person under the age of 18;
- 2.3 "**consent**" means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information;
- 2.4 "**data subject**" for the purpose of this document include all living individuals and juristic persons about whom Strate holds personal information;
- 2.5 "**de-identify**" means to delete any personal information that identifies a data subject, or which can be used by a reasonably foreseeable method to identify, or when linked to other information, that identifies the data subject and the term "de-identified" shall have a corresponding meaning;
- 2.6 "**deputy information officer**" means the person designated as such by the Information Officer in terms of section 56 of POPIA and section 17 of the Promotion of Access to Information Act, 2 of 2000;
- 2.7 "**information officer**" means the person appointed as Strate's chief executive officer, or equivalent officer, or the person who is acting as such;
- 2.8 "**information regulator**" means the information regulator established in terms of section 39 of POPIA;

- 2.9 "**operator**" means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of the responsible party;
- 2.10 "**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 -
- 2.10.1 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;
 - 2.10.2 information relating to the education or the medical, financial, criminal or employment history of the person;
 - 2.10.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 2.10.4 the biometric information of the person;
 - 2.10.5 the personal opinions, views or preferences of the person;
 - 2.10.6 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;
 - 2.10.7 the views or opinions of another individual about the person; and
 - 2.10.8 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 the person;
- 2.11 "**processing / process**" means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including –
- 2.11.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 2.11.2 dissemination by means of transmission, distribution or making available in any other form; or
 - 2.11.3 merging, linking, as well as restriction, degradation, erasure or destruction of information;
- 2.12 "**re-identify**" means, in relation to personal information of a data subject, to resurrect any information that has been de-identified that identifies the data subject, or can be used or manipulated by a reasonably foreseeable method to identify the data subject;
- 2.13 "**responsible party**" means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing of personal information;
- 2.14 "**special personal information**" means personal information relating to: (i) the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or (ii) the criminal behaviour of a data subject

to the extent that such intimation relates to: (a) the alleged commission by a data subject of any offence; or (b) any proceedings in respect of an offence allegedly committed by a data subject or the disposal of such proceedings;

2.15 “**Strate**” or “**we**” or “**us**” means Strate (Pty) Ltd its direct and indirect subsidiaries;

3. RESPONSIBLE PARTY

Strate 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. Strate may instruct operators to undertake certain processing activities relating to your personal information from time to time.

4. PERSONAL INFORMATION WE MAY COLLECT

4.1 You may provide personal information to us either directly or indirectly (through an agent acting on your behalf, or an introducer), by completing an application form for our products and services or requesting further information about our products and services, whether in writing, through our website, over the telephone or any other means.

4.2 We may also collect your personal information from your appointed agent, any regulator, or other third party that may hold such information.

4.3 Information you provide to us

4.3.1 Depending on how you interact with us, Strate may collect the following personal information from you:

- **personal details** such as your name, surname, job title, business partner identity number, agent identity number, entity identification code, client short code, security short code, securities account number, investor code, cash account number, international securities identification number, registration number, passport number and identification number;
- **contact details** such as your email address, postal address, physical address, telephone and cell phone number;
- **account login credentials** such as usernames;
- **account details** such as entity identity number, account name and account number;
- **financial information** such as bank account and payment details, insurance information, financial statements, VAT registration numbers, regulatory filings and fund and investor statements;
- **comments, feedback** and other information you provide to us including search query data, your preferences or interests, your personal views or opinions;
- **transaction information** such as details about payments made to or received from you, settlement instructions, corporate action elections, entitlements or voting and company information, which may consist of financial activity;
- records of correspondence or enquiries from you or anyone acting on your behalf;
- details of contracts and/or transactions you carry out with us;
- date of birth, place of birth, passport number, bank details, details about your employment, tax number and financial information;

- sensitive or special categories of personal information, including biometric information, such as images, fingerprints and voiceprints; and
- personal information that you may provide to us in relation to our services.

4.4 Information from your authorised representative

Strate may obtain your personal information from your authorised representative or an organisation you are affiliated to in order to activate and manage access to and use of the organisation's subscription to our services.

4.5 Information from third-party sources

4.5.1 We may collect personal information from third parties including:

- public databases;
- publicly available and/or accessible sources of information such as company share registers;
- regulatory authorities; and/or
- business partners in connection with Strate's functions and services.

4.5.2 Strate may collect the following personal information from third-party sources:

- **financial information**, which includes bank account and payment card details, insurance information, financial statements, VAT registration numbers, information shared with us by regulatory filings, fund information and investor statements;
- **shareholder information**, which includes shareholder account numbers from CSDPs, FSCA approved nominees, brokers and exchanges (if applicable);
- **transaction information**, which includes details about payments made to or received from you, settlement instructions, corporate action elections, entitlements or voting and company information, which may consist of financial activity, company information, trading exposure and regulatory disclosures; and
- **technical information**, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website.

4.6 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.

5. LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

5.1 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 -

- 5.1.1 your consent is obtained (or consent of a competent person where the data subject is a child);
- 5.1.2 processing is necessary to carry out the actions for conclusion of a contract to which you are a party;

- 5.1.3 processing complies with an obligation imposed by law on Strate;
 - 5.1.4 processing protects your legitimate interest(s); or
 - 5.1.5 processing is necessary for pursuing the legitimate interests of Strate or of a third-party to whom the information is supplied.
- 5.2 Strate will only process personal information where at least one of the legal bases referred to in paragraph 5.1 above is present.
- 5.3 Where Strate 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 5.1.2 to 5.1.5 above.
- 5.4 If consent is withdrawn or if there is otherwise a justified objection against the use or the processing of such personal information, Strate 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.

6. USE OF PERSONAL INFORMATION

- 6.1 Strate will only process personal information for a specific, lawful and clear purpose and will ensure that we make data subjects aware of such purpose(s) as far as possible.
- 6.2 At a general level, Strate may use, transfer and disclose personal information for the purpose of:
- 6.2.1 providing you with the services, products or offerings you have requested, and notifying you about important changes to these services, products or offerings;
 - 6.2.2 providing data vendors with the services, products or offerings they have requested, particularly selling the/or aspects of the Beneficial Ownership Register which may reflect your personal information. This will however always be subject to and in line with, guidelines issued by the Financial Sector Conduct Authority;
 - 6.2.3 receiving services or products provided by you to Strate from time to time;
 - 6.2.4 managing your account or relationship and complying with your instructions or requests;
 - 6.2.5 detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
 - 6.2.6 assessing and dealing with complaints and requests;
 - 6.2.7 operational, marketing, auditing, legal and record keeping requirements;
 - 6.2.8 verifying your identity or the identify of your client;
 - 6.2.9 transferring or processing 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;
 - 6.2.10 complying with applicable laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;

- 6.2.11 recording and/or monitoring your telephone calls and electronic communications to/with Strate in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
- 6.2.12 conducting market research and providing you with information about Strate' products or services from time to time via email, telephone or other means (for example, events);
- 6.2.13 where you have unsubscribed from certain direct marketing communications, ensuring that we do not send such direct marketing to you again;
- 6.2.14 disclosing your personal information to third parties for reasons set out in this Policy or where it is not unlawful to do so;
- 6.2.15 monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from Strate or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and Strate;
- 6.2.16 improving, or evaluating the effectiveness of Strate' business or products, services or offerings;
- 6.2.17 prevention and control of any disease;
- 6.2.18 for authentication and account access purposes;
- 6.2.19 to process payments;
- 6.2.20 to update our records and keep contact details up-to-date;
- 6.2.21 for such other purposes to which you may consent to from time to time;
- 6.2.22 to conduct trading and post-trading services; and
- 6.2.23 for such other purposes authorised in terms of applicable law.

7. PERSONAL INFORMATION FOR DIRECT MARKETING PURPOSES

- 7.1 Strate acknowledges that it may use personal information to contact you for purposes of direct marketing from time to time where it is permissible to do so in terms of applicable law.
- 7.2 Strate may use personal information to contact you and/or market Strate's services directly to you if you are one of Strate's existing clients, you requested to receive marketing material from Strate or Strate has your consent to market its services directly to you.
- 7.3 If you are an existing client, Strate will only use your personal information if it had been obtained through the provision of a service to you and only in relation to similar services to the ones previously provided to you.
- 7.4 We may from time to time (and at any time) contact you about services, products and offerings available from Strate which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have unsubscribed from receiving such communications. You can unsubscribe from receiving such communications by sending an email to dataprivacy@strate.co.za

- 7.5 Strate will ensure that a reasonable opportunity is given to you to object to the use of personal information for Strate's direct marketing purposes when collecting the personal information and on the occasion of each communication to you for the purposes of direct marketing.
- 7.6 Strate will not use your information to send you marketing material if you have requested not to receive such material. If you request Strate to stop processing your personal information for marketing purposes, we will do so.

8. STORAGE OF PERSONAL INFORMATION

- 8.1 Strate has taken appropriate, contractual, reasonable technical and organisational measures to safeguard your personal information to prevent loss or theft, unauthorised access, disclosure, copying, use or modification of your personal information.
- 8.2 Strate may store your personal information using Strate's own secure servers or other internally hosted technology. Your personal information may also be stored by third parties, via cloud services or other technology, with whom Strate has contracted, to support Strate's business operations.
- 8.3 Strate will ensure that such third-party service providers will process the personal information in accordance with the provisions of this Policy, all other relevant internal policies and procedures, and POPIA.

9. RETENTION OF PERSONAL INFORMATION

- 9.1 Strate 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.
- 9.2 Strate may retain personal information for longer periods for statistical, historical or research purposes, and should this occur, Strate 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.
- 9.3 Once the purpose for which the personal information was initially collected and processed no longer applies or becomes obsolete, Strate will ensure that the personal information is deleted, destroyed or de-identified sufficiently so that a person cannot re-identify such personal information.
- 9.4 In instances where Strate anonymises your personal information for research or statistical purposes (i.e. the information has been de-identified), Strate may use such anonymised information indefinitely without further notice to you.

10. PROVISION OF PERSONAL INFORMATION TO THIRD PARTIES

- 10.1 Strate may, in the course of providing any content or services or for purposes listed in paragraph 6.2 above, share certain personal information with third parties who perform certain processing activities on Strate's behalf. For example, service providers may be used, *inter alia*, to provide

telephone support when registering on systems, help us administer and improve Strate's systems, and/or for data storage.

- 10.2 We may share your personal information with the following categories of third parties:
- 10.2.1 service providers who provide Strate with legal assistance, auditing services, IT services and other third-party service providers or experts engaged in the course of the services we provide to our clients;
 - 10.2.2 we may disclose your personal information to the government and regulatory or law enforcement agencies in connection with enquiries, proceedings or investigations, as applicable;
 - 10.2.3 any regulator supervisory authority, including those in foreign jurisdictions, if Strate is required to do so in terms of applicable laws;
 - 10.2.4 third parties and/or our business partners who we have agreements in place with to share your information, including issuers, media houses and data vendors.
 - 10.2.5 your agent or any other person acting on your behalf, an or an introducer.
- 10.3 If we disclose your personal information to an operator, we will enter into written agreements with such third-party service providers to ensure that they process any personal information in accordance with the provisions of this Policy and POPIA.
- 10.4 We require that our service providers and third parties with whom we share your personal information take appropriate, reasonable technical and organisational measures to keep your personal information secure.
- 10.5 If you do not want us to disclose this information to third parties, please contact us at the contact details set out below. We may, however, not be able to provide products or services to you if such disclosure is necessary.

11. CROSS BORDER TRANSFERS OF PERSONAL INFORMATION

- 11.1 Our products and services may be provided using resources and servers located in various countries around the world. Therefore, Strate may send and store personal information to a foreign jurisdiction outside of the Republic of South Africa. We will ensure that there is a legitimate basis for such transfer and take reasonable organisational and contractual measures to ensure that required levels of protection are implemented by third-party service providers to safeguard your personal information.
- 11.2 You should also take note that the processing of personal information in a foreign jurisdiction may be subject to the laws of the country in which the personal information is held, and may be subject to disclosure to the governments, courts of law, enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

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

- 12.1 Strate will take reasonable steps to ensure that all personal information is kept accurate, complete and up to date. Kindly notify Strate, in writing, of any updates required in respect of your personal information.
- 12.2 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.
- 12.3 To protect your privacy and security, Strate 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.
- 12.4 Kindly contact Strate's information officer by sending an email to dataprivacy@strate.co.za to request access to your personal information or the correction or deletion of your personal information.

13. COSTS TO ACCESS PERSONAL INFORMATION

The prescribed fees to be paid for copies of your personal information are listed in Strate's PAIA Manual.

14. PRIVACY AND INDEMNITY

- 14.1 Strate takes your privacy and the protection of your personal information very seriously, and we will only use your personal information in accordance with this Policy and applicable data protection legislation. It is important that you take all necessary and appropriate steps to protect your personal information yourself (for example, by ensuring that all passwords and access codes are kept secure).
- 14.2 We have implemented reasonable technical and operational measures to keep your personal information secure.
- 14.3 You hereby indemnify and hold Strate harmless from any loss, damages or injury that you may incur as a result of any unintentional disclosures of your personal information to unauthorised persons or resulting from your acts or omission during the provision of incorrect or incomplete personal information to Strate.

15. CHANGES TO THIS POLICY

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

16. CONTACT US

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

Information Officer

Tel: +27 11 759 5300

Email: dataprivacy@strate.co.za

Postal Address: Postal Address: PO BOX 78608, Sandton, 2146

Physical Address: 5th Floor, Tower 1, The MARC, 129 Rivonia Road, Sandown, Sandton.

- 16.2 If you are unsatisfied with the manner in which we address any complaint with regarding Strate'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/inforeg/>

Tel: 012 406 4818

Fax: 086 500 3351

Email: inforeg@justice.gov.za

17. GOVERNING LAW

This Policy, and the interpretation and enforcement thereof, will be governed by the laws of the Republic of South Africa and any legal action instituted in connection with this Policy must be instituted in the Republic of South Africa.