

Privacy Notice

This Privacy Statement describes how the Sampada Group collects, uses, discloses, retains, and protects your personal information, in accordance with the Protection of Personal Information Act (POPIA) and other relevant laws. The Privacy Statement applies to any website, application, form, document, product or service which references this Privacy Statement. It also supplements any other privacy notices which may apply in respect of a Sampada Group entities' processing of personal information.

Your privacy is important to the Sampada Group. Personal information transmitted to Sampada will be treated in accordance with Sampada's Privacy Policy which can be requested from info@sampada.co.za.

POPIA defines personal information as “information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person”. This includes, but is not limited to, your name, sex, gender, address, contact details, identity number and medical or health information.

Who we are

In this Privacy Statement, any reference to “Sampada Private Equity”, “Sampada”, “the Sampada Group” or “we” refers to Sampada Limited and all other Group Companies comprising the Sampada Group, operating in South Africa.

How we collect information

We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either:

- Directly from you when you complete a product or service application form, electronically, telephonically or by way of a hard copy;
- Indirectly from you when you interact with us electronically by way of our website, apps, or social media channels, which may include the collection of metadata (data about data);
- From employers and other contracted entities in the context of group policies; and
- Where relevant, from third party sources, such as other entities within the Sampada Group, financial intermediaries that are representatives of the Sampada Group entities or have intermediary agreements with Sampada Group entities, public databases, data aggregators, other financial institutions, credit bureaus, and fraud prevention agencies.

Collection of information by third parties

Owners or information system administrators of third-party websites that have links to the Sampada website, may collect personal information about you when you use these links. Sampada does not control the collection or use of personal information by third parties and this Privacy Statement does not apply to third parties. The Sampada Group does not accept any responsibility or liability for third party policies or your use of a third-party app, platform or service.

The Sampada Group also uses certain social networking services such as Facebook, WhatsApp, Instagram and Twitter to communicate with the public and Sampada Group clients. When you communicate with the Sampada Group through these services, that social networking service may collect your personal information for its own purposes. These services may track your use of our digital channels on those pages where the links are displayed. If you are logged into those services (including any Google service) while using our digital channels, their tracking will be associated with your profile with those service providers. These services have their own privacy policies which are independent of the Sampada Group's privacy policies and practices. Please ensure that you fully acquaint yourself with the terms of any such third-party privacy policies and practices.

What information we collect

Your relationship with the Sampada Group determines the exact nature of the personal information the Sampada Group processes, and the purpose for which such personal information is collected and used. The personal information we may process includes the following:

- Contact information – in some cases, for example, we may receive your email, address, phone number and postal address.
- Online information – for example cookies and IP address (your computer's internet address), if you use our websites, apps and/or social media channels.
- Contractual information – for example details about the insurance policies you hold and with whom you hold them.

In certain instances, we may need consent to process your personal information. If you give us your consent for a specific context, you are free to withdraw this consent at any time. Please note that where you have withdrawn your consent, this will not affect the processing that took place prior to such withdrawal and it will not affect the processing of your personal information where consent is not required.

The supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory.

How we use your information

We have regulatory obligations, including compliance with anti-money laundering legislation, to process your personal information. This includes verifying your identity or the identity of your beneficial owner and/or controlling persons. We are also required by various laws to maintain a record of our dealings with clients.

To the extent permissible under applicable laws, the Sampada Group may use your information:

- To comply with legislative and regulatory requirements, including codes of conduct and requirements, or requests of our regulators (including but not limited to the Financial Sector Conduct Authority and Prudential Authority);
- For the detection and prevention of unlawful activity, fraud, money-laundering and loss, including as part of party due diligence required under applicable laws and in terms of Sampada Group policies;
- For purposes of online login and authorisation;
- To execute the Sampada Group's strategic initiatives;
- Perform any risk analysis or for purposes of providing risk management services to you or our business in general;
- For purposes of proof and/or use in legal proceedings;
- To enhance your experience when interacting with the Sampada Group and to help us improve our offerings to you;
- Conduct market research
- Process your marketing preferences (where you have unsubscribed from certain direct marketing communications, keeping a record of your information and request to ensure that we do not send such direct marketing to you again);

Sharing your information

The Sampada Group will not sell, rent, or trade your personal information to any third party. The Sampada Group may share information about you with advisers that are Sampada Group representatives or have intermediary agreements with the Sampada Group subject to

obtaining your consent. Sampada may also share information within the Sampada Group where it is in Sampada's legitimate interest to do so.

The Sampada Group will disclose information when lawfully required to do so:

- To comply with any relevant legislation;
- To comply with any legal process; and
- By any regulatory authority (for example, the Financial Sector Conduct Authority or Prudential Authority).

On occasion, the Sampada Group may – for legitimate purposes - share aggregated information with its stakeholders and business partners (for example, demographic data) in a manner that does not identify the persons to whom the information applies. However, the Sampada Group will not disclose your personal information to third parties unless there is valid processing ground as set out in section 11 of POPIA.

Transfer across borders

Some of the persons to whom we disclose your personal information may be situated outside of the Republic of South Africa (RSA) in jurisdictions that may not have similar data protection laws to the RSA. In this regard, we may send your personal information to service providers outside of the RSA for storage or processing on the Sampada Group's behalf. We will not send your information to a country that does not have information protection legislation similar to that of the RSA, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with POPIA

Security and storage of information

The Sampada Group intends to protect the integrity and confidentiality of your personal information. The Sampada Group has implemented appropriate technical and organisational information security measures to keep your information secure, accurate, current, and complete. However, we cannot guarantee the security of any information you transmit to us online and you do so at your own risk.

Where third parties are required to process your personal information in relation to the purposes set out in this notice and for other lawful requirements, we ensure that they are contractually bound to apply the appropriate security practices.

Your personal information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Right of access to information

The Promotion of Access to Information Act (PAIA) coupled with POPIA offer a data subject the right to access information held by a public or private body in certain instances. This right can be exercised in accordance with the Sampada PAIA manual which be requested from info@sampada.co.za.

Correction of your information

In accordance with POPIA, you have a right to correct any of your personal information held by the Sampada Group. This right should be exercised in accordance with the procedure outlined in the PAIA manual.

Objection to processing of your information

In accordance with POPIA, you may object to our processing of your personal information on reasonable grounds relating to your particular situation, unless legislation provides for such processing.

Marketing

Where you provide your personal information to a Sampada Group entity in the context of a sale of one of our products or services, you agree to such Sampada Group entity sending you information on news, trends, services, events and promotions for our own similar products and or services, always subject to your right to opt-out of receiving such marketing at the time your information is collected and on each subsequent marketing communication thereafter. You may object to receiving direct marketing from the Sampada Group at any time by contacting the Sampada at info@sampada.co.za.

Where you choose to exercise your right to opt-out of direct marketing, please allow up to 21 days for the Sampada Group to effect that change.

Clickstream data

In the interests of better customer service, the Sampada Group may collect anonymous information from visitors to its websites. For example, the Sampada Group keeps track of the domains from which people visit its website and also measures visitor activity on its website. In the process, the Sampada Group ensures the information cannot be used to identify you. This information is sometimes known as "clickstream data". The Sampada Group or its analytics vendors (including Google Analytics) may use this data to analyse trends and statistics and to provide better customer service.

The information, referred to as traffic data, which may be collected includes:

- Your IP address;

- The search terms you have used;
- The pages accessed on the website and the links you've clicked on;
- The date and time you visited the website;
- The referring website (if any) through which you clicked through to our website; and
- The type of website browser you use.

As mentioned, the traffic data is aggregated and not personally identifiable and our website analysis will also respect any 'do not track' setting you might have on your web browser.

Cookies

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when you access a website. It allows the website to recognize your device and store some information about your preferences or past actions.

What cookies do we use?

Some cookies which we use are essential to the functioning of our website. Some cookies help us with the performance and design of our website. This allows us to measure how many times a page has been visited, whether a page has been visited on the website through an advertisement or by other means. Other cookies help us to remember your settings which you may have selected or assist with other functionality when you browse and use our website. This helps us to remember what you have selected, so on your return visit - we remember your preferences. On certain pages of the website, we use cookies to help us understand your interests as you browse the internet, so we can tailor and render to you more personalised content and services in the future. This assists us in delivering relevant advertising to you during various advertising campaigns we may run from time to time through participating third-party sites.

In addition, we also use cookies on certain pages of our website to communicate with third-party data suppliers in order to extrapolate your digital behaviour. This helps us to understand and target more relevant advertising in the future. The information we receive is all aggregate and anonymous, but will include statistics such as demographics, online behaviour, product interests and lifestyle.

How do I disable cookies?

If you do not want to receive a cookie from the website, you have the option of setting your browser to notify you when you receive a cookie, so that you may determine whether to accept

it or not. However, please be aware that if you do turn off 'cookies' in your browser, you will not be able to fully experience some of the features of the website.

Updates

This privacy statement was last updated in June 2021. This section will be updated whenever the privacy statement is materially changed. Please check the website regularly to ensure that you are aware of the latest version of this Privacy Statement.

Questions or complaints regarding this statement

Questions, comments and requests regarding this statement may be directed to info@Sampada.co.za for clarification.