

Privacy Policy

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1. Introduction

Pegasys Capital Partners Proprietary Limited (“PCP”) is committed to protecting your personal data and this policy outlines why and how we collect and use personal data and provides information about your rights in relation to personal data. It relates to personal information provided to us, both by individuals or by others. PCP may use personal data provided to us for any of the purposes we describe in this policy.

2. Why We Collect Personal Information

PCP collects, uses and shares personal information in and through a number of its operational systems and processes for the purposes of supplying goods and services to its clients, and in its dealings with its suppliers, service providers, potential and current business partners, employees and potential employees. PCP respects your rights when we collect and process your personal information, including your right to be reasonably protected against the unlawful collection, retention, sharing and use of your personal information. We rely on any of the following conditions to process personal information:

- ✦ our legitimate interests in the effective delivery of services to you and in the effective and lawful operation of our business and the legitimate interests of PCP, our clients and business (provided that these do not interfere with your rights);
- ✦ our legitimate interests in developing and improving our businesses, services and offerings (provided that these do not interfere with your rights);
- ✦ to satisfy any requirement of law, regulation or professional body of which we are a member;
- ✦ to perform our obligations under a contractual arrangement with you or a client; and
- ✦ where no other processing condition is available, if you have agreed to us processing your personal information for the relevant purpose.

3. What Personal Information We Collect

We collect personal data of our employees, potential employees, clients, suppliers, business contacts, shareholders and if relevant, website users. If the data we collect is not listed in this privacy policy, we will give individuals (when required by law) appropriate notice of which other data will be collected and how it will be used. If you provide us with personal data of another person (for instance, a potential employee/referral), you are responsible for ensuring that such person is made aware of the information contained in this policy and that the person has given you their consent for sharing the information with PCP and that the information is accurate and correct. We may collect and hold the following personal information about an individual or company when you access and use this website, including but not limited to name, date of birth, ID/passport number, business or home address, gender, nationality, education, language skills, qualifications and experience, contact information, financial and legal information and compliance, copies of curriculum vitae, acceptance of mandatory PCP



compliance policies and PCP webpages accessed. Giving us this information is voluntary, however, if you do not give us this information, we obviously will be unable or limited in our ability to provide any services to you.

4. What We Use Personal Information For

The personal information we collect from you may be used in any of the following ways:

- ✚ recruitment and employment opportunities;
- ✚ operating and managing our business operations;
- ✚ managing our contractual and/or employment relationship with you;
- ✚ completing due diligence on potential business partners in terms of assessing risk and creditworthiness;
- ✚ to enter into any contract with you;
- ✚ to comply with our obligations under any law;
- ✚ to perform any contractual obligations we owe to you;
- ✚ undertaking research relating to our services;
- ✚ monitoring your use of our systems (including monitoring the use of our website and any apps and tools you use); and
- ✚ performing our professional services and duties.

Please note that we only collect and process your information for one or more of the above purposes and for no other purpose unless we have obtained your consent beforehand.

5. Sharing of Personal Information

We may transfer or disclose the personal data we collect to our employees, service providers, professional advisors, public and governmental authorities or third parties in connection with a (potential) contract. Such third parties may be located in other countries. Before we do so, we shall take the necessary steps to ensure that your personal data will be given adequate protection as required by relevant data privacy laws and our internal policies. We do not sell, trade, or otherwise transfer your personal information to outside parties without your consent. This does not include trusted third parties who assist us in conducting our business, or providing our services to our clients. Such persons are each bound by a contractual duty to keep your personal information confidential and secure. We may also release your personal information when we believe it is necessary to comply with the law, or protect our rights, property, or safety, or the rights, property or safety of yourself or other persons.



6. Retention of Personal Information

We retain your data as long as we have an ongoing relationship with you (in particular, if you regularly contract with us). After that, we will then delete or destroy it, unless we need to keep it for longer for evidential reasons or to comply with our other legal and contractual obligations. We may keep your personal information for statistical or research purposes. But we will then remove any unique identifiers which can be used to link that information to you. In other words, the information will be anonymous and cannot be used to identify you.

7. How We Keep Your Information Secure

We implement and maintain a variety of reasonable physical and technical security safeguards to keep any personal information in our possession secure against internal and external risks, but unauthorised access remains a possibility. 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:

- ✚ information security which includes computer and network security;
- ✚ access to and sharing of personal information;
- ✚ retention and disposal of information;
- ✚ acceptable usage of personal information;
- ✚ monitoring access and usage of personal information; and
- ✚ 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. If the security of our systems or our third parties systems is ever breached, and your personal information is leaked or shared with someone who is not authorised to have it, we will notify you as soon as it is reasonably possible in the quickest way possible to help you avoid or reduce any potential risks.

8. Your Rights In Relation to Personal Information

You have the right to ask, free of charge, whether we have a record of any of your personal information and the details of that information. You may also request access to any such record in terms of the procedure set out in our PAIA and POPIA Manual, together with payment of the prescribed fee. While we take reasonably practical steps to make sure our records containing your personal information are always complete, accurate and updated when necessary, you must notify us immediately if you believe any personal information in our possession is inaccurate or out of date. We will then investigate the matter and if any personal information is found to be incorrect, incomplete, inaccurate, irrelevant, excessive, out of date, misleading or was not collected according to the terms of this privacy policy, and will correct, update or delete that information within a reasonable time.



If you notify us that any of the personal information we have about you is not correct or accurate, or needs to be updated, we will immediately stop using that information until we have either corrected or updated it, or we can show that the information is actually correct and up to date. You also have the right, in certain circumstances, to have personal information erased from our records, to restrict the processing of personal information, to object as to how the personal information is being processed, or to have personal information transferred to an individual or to another business. If processing of personal information is based on consent, and individual can withdraw his/her consent at any time by contacting PCP at info@pegasyscapital.com or at the relevant office address or telephone number listed at www.pegasyscapital.com.

You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- ✚ know what information is being kept, how that information is being used and when PCP will disclose that information;
- ✚ correct your details – PCP endeavours to keep your information up to date, however, should any of your details change, please notify us of same so that our records are as accurate as possible; and
- ✚ revoke consent given to us in terms of this privacy policy at any time. Your revocation should be in writing and addressed to the Directors of PCP. Revoked consent is not retroactive and will not affect use of your information already made.

If, despite our commitment and efforts to protect your personal data, you believe that your data privacy rights have been violated, we encourage and welcome individuals to come to PCP first to seek resolution of any complaint. You have the right at all times to register a complaint directly with the relevant authority or to make a claim against PCP with a competent court.

9. Cookies

Cookies are small files that we use on the website which transfers to your computer's hard drive through your web browser (if you allow it) to enable us to recognize your login details, browser and capture and remember certain information about your settings and preferences. We use cookies to make our website and our users' experience more efficient and to help us improve our services.

10. Automated Decisions

PCP does not make decisions based solely on the automated processing of data, which produce legal effects that significantly affect the individuals involved. If automated decisions are made, affected persons will be given an opportunity to question the automated decision and object to it.



11. Complaints

We respect your right to privacy and undertake to only collect and use your personal information when it is necessary and relevant to our business needs and only according to the terms set out in this policy. If you are not happy with anything we do in relation to your personal information, you may lodge an objection or complaint with our information officer at info@pegasyscapital.com or at the relevant office address or telephone number listed at www.pegasyscapital.com. If your objection or complaint is not resolved to your satisfaction, you have the right to lodge a complaint with the Information Regulator.

12. The Information Regulator

The Information Regulator of South Africa will be relocating offices and will then be based at:

- JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- P.O Box 31533, Braamfontein, Johannesburg, 2017
- Complaints email: complaints.IR@justice.gov.za
- General enquiries email: infoereg@justice.gov.za

13. Changes to this Policy

This Privacy Policy may change and you should therefore review it regularly before using our services or products, or when accessing and using our website(s).

REVISION HISTORY

Date Updated	Update Details	Updated By
25/06/2021	New version	Daniel Acres

14. Disclaimer

Pegasys Capital Partners (Pty) Ltd ("PCP") is a limited liability private company, duly incorporated in the Republic of South Africa, with registration number 2020/242170/07. This document contains proprietary confidential information of PCP, the disclosure and use of which is strictly prohibited, without the prior written approval of PCP. The information contained in this document does not constitute advice and PCP does not accept any liability for any damage, loss or expense that may arise from any reliance that is placed on the information herein.