



TRT INVESTMENTS LIMITED PRIVACY POLICY

TRT Investments Limited (“TRT”) is an independent portfolio and funds management Company, whose core business is to provide investment solutions. In conducting our business, it is crucial for TRT to process certain personal information.

At TRT, we are committed to ensuring that we process your personal information lawfully and in accordance with the Protection of Personal Information Act (2013) (“**POPI**”) and, more importantly, to maintaining your confidence and trust. With your privacy in mind, this Privacy Policy outlines the way we process your data.

Note that, this Privacy Policy applies to TRT and all its subsidiaries, including subsidiaries to be formed, as well as its operators, which it shall appoint, from time to time.

What personal information do we collect about you?

We process different kinds of information about you, depending on the manner in which we are required to engage with you.

In general, the personal information we process includes:

- Identity data: name and registration number of your company or entity if you are a legal person, first name and surname and identity number if you are a natural person or the representative of a legal person
- Contact data: address, email address, contact number
- Financial data: bank account and card details, credit history
- Medical and biometric data: medical history, biometric data, and related information
- Education and employment data: related to your education and employment history
- Preference data: personal opinions, views or preferences for *inter alia* products and services
- Transaction data: details about payments and products/services you have purchased from us
- Historic information: information about your previous residences, employment history, and related information
- Technical data: includes 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 this Website. As well as information about your visit, including the full URLs, clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page

- Profile data: username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses
- Usage data: information about how you use our Website, products and services.
- Marketing and communications data: your preferences in receiving marketing from us and our third parties and your communication preferences
- Correspondence: all data exchanged when you correspond with us
- Special Personal Information: relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth

For TRT employees, we process certain additional personal information, including special personal information as defined under POPI, for employment record-keeping and human resource purposes. If you are a TRT employee and should you require further detail on this, please contact the Information Officer directly.

How do we collect your personal information?

- Direct interactions: by way of filling in forms, contracts, email or telephone correspondence, purchasing or subscribing to products/services, and via our Website.
 - Automated technologies or interactions: we automatically collect technical data about your equipment, browsing actions and patterns as you use our Website. We collect this personal information by using cookies and other similar technologies.
 - Third parties or publicly available sources: example, business partners, sub-contractors or credit reference agencies.
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Why do we use your personal information?

TRT will only use your personal information when the law allows us to. This will include processing your personal information in order to:

- provide services to you
- verify your identity
- register you as a customer
- assess your credit worthiness in respect of the services for which you're engaging us
- conduct market research and analysis, include data analytics for our website
- send marketing material to you, in which we believe you will have an interest and in respect of which you may unsubscribe using this link info@trt.company
- send updates on investments
- for general commercial purposes related to our legitimate interests
- to comply with legal or regulatory obligations

We will only ever use your personal information for the purposes for which we collected it, unless there is a lawful and justifiable reason to do otherwise. Our conduct, in this regard, will be dictated by the provisions of POPI and South African law.

Marketing

We will provide you with choices regarding certain personal information uses, particularly around marketing and advertising. You will receive marketing communications from us if you have requested information from us or purchased services from us. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or where you opt out of receiving these marketing messages, this will not apply to personal information provided to us as a result of a product/service purchase, product/service experience or other transactions.

You may set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Website may become inaccessible or not function properly.

Will we share your personal information?

We may share your personal information with:

- our service providers, such as cloud-storage companies and technical support
 - your legal providers, and legal providers of the parties who are party to any transaction with you
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- parties you have instructed us to share your details with
- parties with whom we are required to share your details in order to provide you with the services for which you've contracted us
- governmental bodies and other such entities, as required under law
- with credit bureaus to report account information, as permitted by law
- with social media platforms when you use tools or functionality on our Website provided by those platforms (such as "recommend" or "share" buttons)
- with marketing partners where you register for events or other related events
- for business transactions like a merger, or sale of our assets, or as part of the due diligence for such contemplated transactions. If a corporate transaction occurs, we will provide notification of any changes to control of your personal information, as well as choices you may have.

How secure is our data?

We process and protect your personal information in accordance with industry standards.

While we have taken all reasonably practicable steps to protect your personal information, we cannot guarantee that it will not be subject to a security compromise. In such cases, however, we have put in place procedures to deal with any suspected personal information breach and will notify the Information Regulator and, subject to the provisions of POPI, you of any security compromise where we are legally required to do so.

How long will we use your personal information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Queries, complaints and objections

Should you have any queries, complaints and objections about the manner in which your information is processed, or should you wish to access or correct your personal information



with us, please send an email to our Information Officer Blessing Mlambo, at blessing.mlambo@trt.company.

Note that you are also entitled to direct any such queries, complaints or objections to the Information Regulator at complaints.IR@justice.gov.za.

