

NAVIGARE SECURITIES

(hereafter also known as “Navigare” or “NVG” or “the Company”)

PRIVACY STATEMENT (FOR USE ON WEBSITES)



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Privacy Statement

Navigare Securities (Pty) Ltd is committed to maintaining the confidentiality, integrity, and security of personal information of our current and prospective clients. We understand that privacy is important to every client, and we hereby provide understanding as to how we protect your privacy when we collect personal information about you. This privacy notice is provided to enable you to make an informed decision as to whether you would like to use this website, our products and/or our services.

In terms of the Protection of Personal Information Act (POPIA), a “Responsible Party” (in this case being the Company) has a legal duty to process a “Data Subject’s” personal information (in this case being your personal information and related details) in a lawful, legitimate, and responsible manner. In order to discharge this duty, the Company requires your express and informed permission to process your personal information.

In the event of refusal to give the required consent, the Company will still have the right, in terms of POPIA, to process your information without your consent under any of the following circumstances:

- where such processing and use of your personal information is necessary to give effect to a **contractual relationship** as between you, or your company and Navigare, for
- products and services either sold or purchased;
- where such processing is **required in terms of a law**, such as without limiting the generality thereof, Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS), the Financial Intelligence Centre Act 38 of 2001 (FICA), SA Tax laws, Companies Act of 2008, to name but a few. *For a detailed list refer to the PAIA manual which is available on our website (www.navigare.co.za);*
- where such processing is necessary to protect the **legitimate**
- **interests** of Navigare or a third party; or
- where such processing is necessary to protect your legitimate interest.

Navigare Securities is committed to protecting personal information that it collects and uses regarding clients, suppliers, website users and other respective parties. We are also committed to keeping your personal information confidential, preventing any unauthorised access, and storing only as long as is required in terms of applicable regulations.

How to contact us

Name of Organisation/Company	Navigare Securities (Pty) Ltd
Company email	Compliance@navigare.co.za
Company Tel number	011 853 8700
Company Address	51 West Street, Houghton, JHB, 2041



For more information about our privacy practices, if you have questions, or if you would like to lodge a complaint, please contact us by e-mail [compliance@navigare.co.za] or by mail using the address details provided above.

Information we collect

The types of Personal Information we collect depends on our interaction with the data subject such as:

- in relation to the services or products that you purchase or are using from us.
- agents or operators acting under instruction of Navigare; and
- suppliers or service providers who provide products or services to Navigare.

The information may include some or all of the following:

- Contact information - such as name, alias, address, phone number, social media user ID, IP address, email address, and similar contact data.
- Bank account details from all suppliers to Navigare
- Company details – CIPC information, VAT number, billing and postal address, contact information, shareholding structure, Directors' information, representatives of the company that will interact with Navigare to meet contractual obligations.
- Client/User content – feedback, improvements, suggestions, queries or any other information, that you provide to us when you contact us.
- Identity, information – ID number, Company registration number or Trust Number
- Refer to the table below under the heading "Processing of Personal Information" to view the Personal Information we collect for the various categories of data subjects.

Mandatory

We bring to your attention that we require your personal information to:

- In the case of a client:
 - conclude a contract with you to provide trading services; or
 - research services where requested
 - comply with various applicable Rules, Directives and Legislation
 - report to related authorities (JSE , FIC, FSCA, Information regulator etc) & government and keep records with those applicable Acts, tax and financial legislation
- In the case of operators, suppliers and service providers:
 - Company registration information
 - VAT number
 - Banking details
 - Billing address and contact persons



All Personal Information which is provided to the Company will only be used for the purposes for which it is collected.

Consequences of Withholding Consent or Personal Information

Should you refuse to provide the Company with the required consent and/ or information, the Company will be unable to assist you with one of the following:

- provide you with the Company's offered products or services
- conclude any transaction or
- procure products and services from you and make payment for such products and services

Accuracy of information

POPIA requires that all your personal information and related details supplied are complete, accurate and up to date. Whilst Navigare will always use its best endeavours to ensure that your personal information is reliable, it will be your responsibility to advise us of any changes to your personal information, as and when these may occur.

Sources of information

We collect information directly from you, from authorised persons appointed by yourself or the company, from certain 3rd parties or other publicly available sources:

Directly from you when you do any of the following:

- Sign a contract to subscribe to our products and services (incl. Trading / Research)
- Interact with us
- Register for or attend any of our events i.e., corporate access events, workshops, training etc
- When you communicate with us via email, phone, chat, in person or otherwise
- When you complete a questionnaire or support query

Automatically

- Access, use or download content from us.
- Open emails or click on links in emails or advertisements from us.
- Otherwise interact or communicate with us (such as when you attend one of our events or locations, when support is requested or information is sent, or when you mention or post to our social media accounts).

We may also collect information about you from 3rd parties such as:

- Service providers and business partners who work with us in relation to our Services and that we may use to deliver certain content, products or services or to enhance your experience.
- Sales generation services or business partners.
- Credit bureaus and other similar agencies.
- Government agencies and others who release or publish public records.



- Other publicly or generally available sources, such as social media sites, public and online websites, open databases, and data in the public domain.

How we use the information

First, some laws require us to explain the lawful basis upon which we process your personal information. With respect to these laws, we process personal information about you for one or more of the following legal bases (as provided for in the Protection of Personal Information Act (POPIA)):

- **To Perform a Contract.** Where the processing is necessary for the performance of contract.
- **Legitimate Interests.** Where the processing is necessary for legitimate interests pursued by Navigare or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal information.
- **Your Consent.** Where you have given us consent to process your personal information for specified purposes, such as to provide our Products and Services and other items requested by you.
- **Comply with Legislation, Rules & Directives and applicable Acts.** Where the processing is necessary for compliance with a legal obligation, such as Tax law, B-BBEE Laws, etc. This includes Navigare's obligations to comply with Trading & Settlement Rules (Exchange rules) as well as all requirements under acts like the FIC Act, FATCA, FAIS etc.



Processing of Personal Information

We process your personal information in connection with our Products and Services and for other business purposes, including below:

Category of Data Subjects	Type of PI we collect, process and store	Type of Processing
Clients (Individuals)	Full Names & Surname; Contact details (Email & Telephone numbers); Physical and Postal addresses; DOB; ID# / Passport; Tax related info (Tax reference number); Bank account details	<ul style="list-style-type: none"> • to provide products and services to clients, • to transact on behalf of the client and manage its account with Navigare • to administer and manage accounts in line with applicable legislation (FMA, FAIS, FICA, Exchange Rules and Regulations); • to communicate with the client and provide technical support where required; • to maintain transaction and service records,
Clients (Juristic entities)	<p>Full Entity Name , registration number , SARS VAT number, physical address of operation, Bank account details, ownership details (who owners are and Voting rights %) , Contact details (Telephone & Email).</p> <p>For Trusts, we collect the following: Trust registration number, Beneficiaries, Trustees & Donor- Names and Surnames & Identity details</p>	<ul style="list-style-type: none"> • to perform credit checks, • to verify clients' authority or identity, • to verify the identity and authority of persons acting on behalf of other persons or entities; • to detect and prevent fraud, crime, cybercrime and security breaches, identify market breaches, respond to legal notices, or institute or participate in legal proceedings, and • to comply with legal or regulatory requirements under which Navigare operate or which otherwise apply to Navigare. • Comply with your instructions or to fulfil other, specified purposes for which you have given your consent. • Contact and communicate with you in connection with our Products and Services or other notifications, programs, events, or updates that you may have registered for; • assess risk; • in terms of Financial Intelligence Centre Act 38 of 2001 ("FICA") Navigare is required to identify, verify and conduct due diligence of the Client before entering into a business relationship or concluding a single transaction with the Client. In order to achieve this, the Client is required to provide certain information to Navigare. The information required from the Client must ensure full compliance with the requisite legislation. The Client undertakes to provide verification of identity and due diligence updated whenever this is required by Navigare. The Client further undertakes to inform Navigare of any changes to the information provided and to provide any additional information or verification of information that may become necessary due to any legislative changes.



Suppliers and other contracted service providers	Juristic entity's name, Reg #, SARS Tax or VAT#, Billing address, Banking details and a contact person's name, contact number and email address	to pay the entity fees due to suppliers, to contact the entity as it relates to the services it provides and to meet tax law obligations as they pertain to invoices and payments
Research Providers	Juristic entity's name, Reg #, VAT#, Billing address, Banking details and a contact person's name, contact number and email address	Research Provider is aware that in respect of each transaction notified to Navigare by the Client as a transaction for which the commission shall be shared with the Research Provider, that Navigare have agreed with the Client to pay the research provider such amount as may be agreed from time to time between Navigare and the Client representing a proportion of the commission received by in relation to such transaction.
Public and Visitors	Full Names; Surname; ID / Passport Number; Contact details (Telephone -home & cell & email)	For the purposes of security to company personnel and buildings, COVID-19 management, OHS Act compliance (in cases of emergency such as fire, flood, etc)

Automated Decision Making

Automated decision making refers to the use of software to create a profile of a client. Navigare does not use make use of automated decision-making in the processing of its data subjects.

Other forms of processing that may occur:

- The performance of Due Diligence in order to detect and prevent fraud and abuse to ensure the security and protection of all customers and others, as well as to identify and authenticate your access to our Products and Service or to identify and authenticate a client before we provide you with certain information.
- Exercising of our rights and to protect our and others' rights and/or property, including to take action against those that seek to violate or abuse our Products and Services.
- Comply with the law and our legal obligations, including to respond to a request or order from a court, regulator, or authority, as well as to fulfil our contractual obligations with our customers when they arrange access to our Products and Services for you.

How we share information

As a rule we do not share your personal information with anyone for any reason other than where we do so for the purposes set out in this Privacy Statement as set out below:

- Copies of all NVGs client mandates & FICA documents are shared with our outsourced verification and payments processing provider who is a financial services provider, regulated by the FSCA and bound by the rules regarding the Protection of Personal information Act (POPIA).



- Other Third Party Service Providers. We may share your personal information with our third party service providers to perform tasks on our behalf and to assist us in offering, providing, delivering, analysing, administering, improving, and personalising our Products and Services.
- In the Event of Merger, Sale, or Change of Control. We may transfer this Privacy Statement and your personal information to a third party entity that acquires or is merged with us as part of a merger, acquisition, sale, or other change of control (such as the result of a business rescue proceeding).
- Other Disclosures. We may disclose your personal information to third parties if we reasonably believe that disclosure of such information is helpful, to enforce our terms and conditions or other rights (including investigations of potential violations of our rights), to detect, prevent, or address fraud or security issues, or to protect against harm to the rights, property, or safety of the organisation, our users, or the public.
- Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

Cross border flows

We do not transfer any personal information outside South Africa, however if we were required to do so, we will ensure that the information is transferred in accordance with this Privacy Statement and as permitted by applicable data protection laws that require the recipient entity in a foreign country to at least meet the minimum requirements as set out in POPIA.

Security of information

The security of your personal information is important to us. Taking into account the nature, scope, context, and purposes of processing personal information, as well as the risks to individuals of varying likelihood and severity, we have implemented technical and organisational measures designed to protect the security of personal information.

All Personal Information which you provide to the Company will be held and/ or stored securely for the purpose as stated above. Client information is kept safe in a storeroom to which only authorised NVG staff have access to. Storage will be secure and monitored regarding the safety and the security of the information.

Where we transfer personal information to an Operator or 3rd party service provider, we request that they treat your personal information as confidential and only be used for the purpose in terms of the agreement signed between NVG and the operator or 3rd party service provider. We also request that they have technical and organisational measures designed to protect the security of personal information.



Where data is stored electronically outside the borders of South Africa, such is done only in countries that have similar privacy laws to our own or where such facilities are bound contractually to no lesser regulations than those imposed by POPIA.

However, please note that no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable measures designed to protect personal information, we cannot guarantee its absolute security.

Our security procedures also means that we may request proof of identity before we disclose personal information to you or before we process certain requests.

In the event of a data breach, where personal information of data subjects has been compromised and it is envisaged that some harm could be caused to you, Navigare shall promptly inform the data subject should the personal information be unlawfully accessed, disclosed, destroyed and processed and shall report the breach to the affected individual(s) and the Information Regulator. Navigare will, where reasonably practical and applicable provide the affected data subjects with details of the breach, when it occurred, the measures employed to identify the source of the breach and to prevent further breach.

Retention of information

We calculate retention periods based upon and reserve the right to retain personal information for the periods that the personal information is needed to:

- fulfil the purposes described in this Privacy Statement,
- meet the timelines determined or recommended by regulators, professional bodies, or associations,
- comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and
- comply with client requests.

Once this information is no longer required, since the client no longer requires Navigare to perform its obligations in terms of the agreed mandate, such personal information will be safely and securely archived for a period of at least 5 years, or longer, as this is the minimum period required by most legislation applicable in South Africa. Thereafter, all your Personal information will be permanently destroyed.

Children's privacy

Our Products and Services are intended for professionals and/or individuals over eighteen (18) years of age.

We do not target children and do not knowingly collect any personal information from children under the age of thirteen (13).

In the case where an account is opened for children under 18 (minors), we ensure that a competent person provides the necessary consent on behalf of the minor.



Direct Marketing

Navigare does not currently engage in any direct marketing practices.

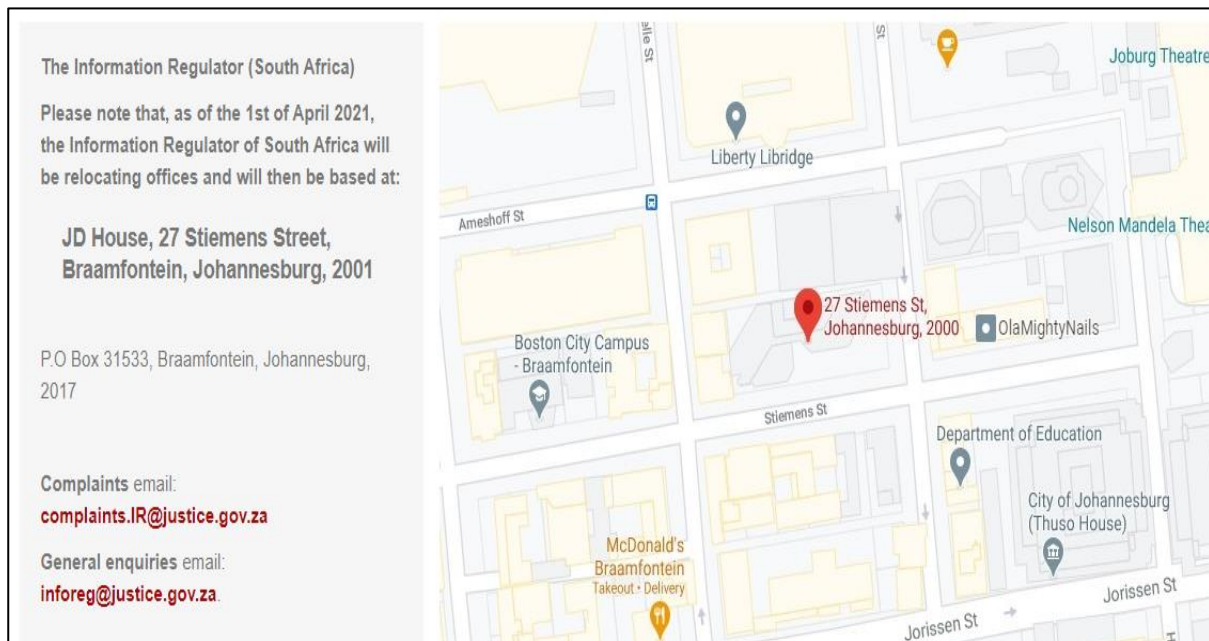
Your Rights concerning your personal information

What rights may be available to me?

- **Access to Personal Information.** You have the right to obtain confirmation from us that we process your personal information and, if so, you may have the right to request access to your personal information. Please note that, to the extent permitted by law, we may charge a reasonable fee based on administrative costs for the first or further copies of your personal information requested by you.
- **Correction.** You have the right to request that we correct inaccurate personal information concerning you and, depending on the purposes of the processing, you may have the right to have incomplete personal information completed.
- **Deletion/Destruction.** You have the right to require us to destroy some or all of the personal information concerning you.
- **Restriction of Processing.** You have the right to require us to restrict the further processing of your personal information. In such cases, the respective information will be marked as restricted and may only be processed by us for certain purposes.
- **Object.** You have the right to object in the prescribed manner to the Company, on grounds relating to your situation to the processing of your personal information by us, and we may be required to no longer process some or all of your personal information. On receipt of your objection the Company will place a hold on any further processing until the cause of the objection has been resolved.
- **Withdraw Consent.** You have the right to withdraw consent you have provided to us where we rely solely on your consent to process your personal information. You can always provide your consent to us again later.
- **Right to Complain.** You have the right to lodge a complaint with the Information Officer of the Company or to the Information Regulator if you are not satisfied with our responses to your requests or how we manage your personal information.



Details of the Information Regulator



How do I submit a request?

To make a request or exercise your rights, please access our PAIA Manual which is available on our website (www.navigare.co.za) and at our office, which sets out the relevant information, procedure to follow, forms to complete, and applicable fees, amongst other information.

When you make a request, we ask that you help us with the following:

- **Let us know Which Right You Are Exercising:** Please specify which right you want to exercise and the personal information to which your request relates (if not to you). If you are acting on behalf of another individual, please clearly indicate this fact and your authority to act on such person's behalf.
- **Let us know More about Your Relationship with Us:** Please let us know how you are associated with us, such as that you use certain Products and Services of ours or that you were a former employee.
- **Help Us Verify Your Identity:** As mentioned above, our security procedures mean that we may request proof of identity before we disclose personal information to you or before we process your other requests. Provide us enough information to verify your identity. If we cannot initially verify your identity, we may request additional information to complete the verification process (such information may include your picture, a copy of your driver's license or other government-issued ID and/or a recent utility bill). Please note that if we cannot verify your identity, we may not be able to fulfil your request. Any personal information you disclose to us for purposes of verifying your identity may be shared with our third party service providers and/or third parties (like your phone carrier) or government agencies for the purpose of verification.



- **Direct Our Response Delivery:** Depending on your request, we will provide a response to you via email or through a link to access certain information. If you prefer to receive our response in another way, then please let us know your preferred delivery mechanism to receive our response. You may specify, for example, email, mail, or through your account (if you have one with us).

Changes and Conflicts

We may update this privacy policy from time to time to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. We reserve the right to amend this Privacy Statement at any time, for any reason, and without notice to you other than the posting of the updated Privacy Statement on our Services.

If there is any conflict between the English version of our Privacy Statement and a version translated in another language, the English version controls.

