

NAVIGARE SECURITIES

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

PRIVACY STATEMENT



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Privacy Statement

Navigare Securities (Pty) Ltd (“Navigare”) is committed to maintaining the confidentiality, integrity, and security of the personal information entrusted to us by current and prospective clients. Navigare recognizes the importance of privacy and aim to provide clarity on how personal information is collected, utilized and protected. This privacy notice is intended to inform clients and other stakeholders about the measures in place to safeguard personal information and to support informed decisions regarding the use of our website, products and services.

In terms of the Protection of Personal Information Act 4 of 2013 (POPIA), a “Responsible Party” (in this case Navigare),) has a legal duty to process the personal information of a “Data Subject” (being any natural person or juristic entity whose personal information is collected, held, or processed by Navigare) in a lawful, legitimate, and responsible manner. To fulfil this obligation, Navigare may, where required, obtain the express and informed consent of the Data Subject to process personal information.

However, in accordance with POPIA, Navigare is entitled to process personal information without such consent under any of the following circumstances:

- where processing is necessary to give effect to a **contractual relationship** between the Data Subject (or the Data Subject’s company) in respect of products or services provided or received.;
- where such processing is **required in terms of a law**, including but not limited to the 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, and related legislation. *For a detailed list, please refer to the PAIA manual* which is available on our website (www.navigare.co.za);
- where processing is necessary to protect the **legitimate interests** of Navigare or a third party; or
- where processing is necessary to protect the legitimate interest of the Data Subject.

Navigare is committed to safeguarding all Personal Information collected and processed in relation to clients, suppliers, website users and other respective parties. Navigare is dedicated to ensuring that Personal Information remains confidential, is protected against unauthorized access, and is retained only as long as is required in terms under applicable regulations.

Contact details

Information Officer:	Jennifer Titus
Physical Address:	51 West Street, Houghton, JHB, 2041
Telephone Number:	011 853 8702
Email:	compliance@navigare.co.za



Deputy Information Officer:	Christopher Beilings
Physical Address:	51 West Street, Houghton, JHB, 2041
Telephone Number:	011 853 8712
Email:	compliance@navigare.co.za

For any enquiries regarding this **Privacy Notice** or **Navigare's privacy practices**, or to **lodge a complaint**, please contact us using the details above. Enquiries may be submitted by e-mail to the Compliance address or by post to the address provided above.

Collection of Personal Information

The categories of Personal Information collected by Navigare depend on the nature of the interaction with the Data Subject. Such information may be collected:

- in relation to the services or products purchased from, or used through Navigare;
- from agents or operators acting under the instruction of Navigare; and
- from suppliers or service providers who provide products or services to Navigare.

The Personal Information collected may include, but is not limited to:

- Contact information - Including name, alias, address, telephone number, social media user ID, IP address, email address, and similar contact details.
- Bank account details provided by suppliers to Navigare
- Company details – CIPC information, VAT number, billing, and postal address, contact information, shareholding structure, Directors' information, representatives authorized to act on behalf of the company in fulfilling contractual obligations with Navigare.
- Client/User content – including feedback, improvements, suggestions, queries, or any other information provided when engaging with Navigare;
- Identity information – such as ID number, Company registration number or Trust Number; and
- Additional Information – as further outlined in the table under the heading “Processing of Personal Information”, which sets out the Personal Information collected for each category of Data Subjects.

Mandatory Personal Information

Certain Personal Information is mandatory and must be provided in order for Navigare to fulfil its legal and contractual obligations. This includes:

- For Clients:
 - concluding contracts for the provision of trading services; or
 - research services where these services have been requested
 - complying with applicable Rules, Directives and Legislation



- reporting to relevant authorities (JSE, FIC, FSCA, Information regulator, and Tax or Government authorities,
- For Operators, Suppliers, and Service Providers:
 - company registration information
 - VAT number
 - banking details
 - billing address and information of relevant contact persons

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

Consequences of Withholding Consent related to Personal Information

Where a Data Subject withholds consent or fails to provide the required consent and/ or information, Navigare will be unable to:

- provide the requested products or services
- conclude any transactions or
- procure products and services and make payment for such products and services

Accuracy of Personal Information

In terms of POPIA, Personal Information and related details must be complete, accurate and up to date. While Navigare will take all reasonable steps to ensure that the Personal Information remains reliable, it is the responsibility of the Data Subject to notify Navigare of any changes to their personal information as soon as these occur.

Sources of Personal Information

Navigare collects Personal Information from a variety of sources, depending on the nature of the interaction with the Data Subject. These sources include:

Directly from the Data Subject, including instances where the Data Subject:

- signs a contract to subscribe to Navigare's products and services (including Trading or Research services);
- interacts with Navigare in the course of business
- registers for or attends events hosted by Navigare, such as corporate access events, workshops, training sessions etc.
- communicates with Navigare via email, telephone, chat, in person or other channels; or
- completes a questionnaire, survey or support query.

Automatically through engagement with Navigare, such as when a Data Subject:

- accesses, uses or downloads content from Navigare.
- opens emails or clicks on links in communications or advertisements distributed by Navigare; or
- interacts with Navigare at events, through support channels, or via Navigare's official social media accounts).



From Third Parties and Public sources

Navigare may also collect Personal Information from third parties and publicly available sources, including:

- service providers and business partners engaged by Navigare to deliver products, services or content, or to enhance the client experience.
- sales generation services or strategic business partners.
- credit bureaus and other agencies providing verification or credit assessment services.
- government agencies and regulators that release or publish public records.
- publicly or generally available sources, such as social media platforms, databases, websites, online databases, and other information in the public domain.

Purpose and Lawful Basis for Processing of Personal Information

Certain laws require Navigare to explain the lawful basis on which Personal Information is processed. In terms of the Protection of Personal Information Act, 4 of 2013 ("POPIA"), Navigare may process Personal Information on one or more of the following bases :

- **Performance of a Contract** - where the processing is necessary for the conclusion or 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 the rights and freedoms of the Data Subject.
- **Consent**- where a Data Subject has expressly consented to Navigare processing Personal Information for specified purposes, such as the provision of products and services.
- **Compliance with Legislation, Rules & Directives, and applicable Acts**- where the processing is required to comply with a legal obligation, including but not limited to Tax law, B-BBEE legislation, trading and settlement rules and obligations under statutes such as the Financial Intelligence Centre Act (FICA), the Financial advisory and Intermediary Services Act (FAIS), the Financial Markets Act (FMA), and the Foreign Account Tax Compliance Act (FATCA).

Overview of Personal Information Processing

Navigare processes Personal Information in connection with the provision of its Products and Services, as well as for other legitimate business purposes. The following provides an overview of the categories of Data Subjects, the Personal information collected, and the purposes for which it is processed:

Category of Data Subjects	Personal Information collected	Processing Purposes
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, • to conduct credit checks,
Clients (Juristic entities & Trusts)	<p>Full Entity Name, registration number, SARS VAT number, physical address of operation, Bank account details, ownership and voting rights information , Contact details (Telephone & Email).</p> <p>For Trusts: Trust registration documents which include the Trust Deed, Names & surnames and details of Beneficiaries, Trustees & Donors</p>	<ul style="list-style-type: none"> • to verify clients' identity and authority • to verify the identity and authority of persons acting on behalf of other persons or entities; • to detect and prevent fraud, crime, cybercrime, security breaches, and market abuse, respond to legal notices, or institute or participate in legal proceedings, and • to comply with legal or regulatory requirements • To comply with the Data Subjects' instructions or to fulfil other, specified purposes for which consent has been provided. • to communicate regarding products and services or other notifications, programs, events, or updates that the Data Subjects may have registered for; • assess risk; • to conduct Due Diligence and client verification in terms of Financial Intelligence Centre Act 38 of 2001 ("FICA"), as required before entering a business relationship or concluding a single transaction with the Client. Clients are required to provide certain information and update such information as necessary to ensure ongoing compliance with legislative requirements.
Suppliers and other contracted service providers	Juristic entity's name, Reg #, SARS Tax or VAT#, Billing address, Banking details and a contact person's details (name, telephone number and email)	<ul style="list-style-type: none"> • to process payments for services provided due to maintain tax records • to communicate regarding contacted services.
Research Providers	Juristic entity's name, Reg #, VAT#, Billing address, Banking details and a contact person's details (name, telephone number and email)	<ul style="list-style-type: none"> • to facilitate commission-sharing arrangements with Clients as agreed from time to time between Navigare, the Mutual Client and the Research provider • to process payments in relation to transactions notified to Navigare by the Client.



Automated Decision Making

Automated decision making refers to the use of software to create a profile of a client. Navigare does not engage in automated decision-making in the processing of Personal Information of a Data Subject.

Other forms of processing that may occur:

Navigare may process Personal Information for purposes including but not limited to:

- Conducting Due Diligence to detect and prevent fraud and abuse, and to ensure security and protection of clients and stakeholders.
- Exercising rights and protecting the rights and/or property of Navigare or third parties, including acting against unlawful conduct and violation or abuse of Navigare's Products and Services.
- Complying with the legal obligations, including responding to lawful requests or orders from courts, regulators, or authorities;
- Fulfilling contractual obligations with clients or third parties who provide access to Navigare's Products and Services.

Sharing of Personal Information

As a rule, Navigare does not share Personal Information with third parties, except where required for the purposes outlined in this Privacy Statement or as permitted by law. Personal Information may be shared under the following circumstances:

- **Outsourced verification and processing** - Copies of all client mandates & FICA documents are shared with our outsourced verification and payments processing provider. This provider is a licensed, financial services provider, regulated by the FSCA and is bound by the requirements of the Protection of Personal information Act ("POPIA").
- **Third-Party Service Providers** - Navigare may share Personal Information with third-party service providers engaged to perform services on Navigare's behalf, including, the provision, delivery, analysis, administration, improvement, and personalization of Products and Services.
- **Mergers, Acquisitions, or Change of Control:** In the Event of merger, sale, acquisition, restructuring, or change of control (including business rescue proceedings), Personal Information may be transferred to the acquiring or successor entity.
- **Legal Disclosures and Enforcement** – Personal Information may be disclosed to third parties where reasonably necessary, to enforce Navigare's terms and conditions, to investigate or address potential violations of rights, to detect or prevent fraud or security incidents, or to protect against harm to the rights, property, or safety of Navigare, its clients, or the public.
- **Compliance with Law** – Navigare may also share Personal Information to comply with applicable laws and regulations, or to respond to a subpoena, search warrant or other lawful request for information.



Cross- border Transfers of Personal Information

Navigare does not routinely transfer Personal Information outside South Africa. If such transfers are required, the transfers will only occur in compliance with this Privacy Statement and in accordance with applicable data protection laws. Navigare will also ensure that any recipient located in a foreign country provides a level of protection that is at least equivalent to the minimum standards required under POPIA.

Security of Personal Information

The security of Personal Information is a priority for Navigare. Considering the nature, scope, context, and purposes of processing Personal Information, as well as the risks to Data Subjects, Navigare has implemented appropriate technical and organizational measures to safeguard Personal Information.

All Personal Information provided to Navigare is securely stored. Physical records are held in restricted-access facilities, and electronic records are stored in secure environments with access limited to authorized employees.

Where Personal Information is transferred to an Operator or third-party service provider, Navigare requires that such parties treat information as confidential, process it solely for the agreed purposes, and implement appropriate security safeguards.

Where information is stored electronically outside the borders of South Africa, this will only occur in jurisdictions with comparable data protection laws or under contractual obligations imposing protections equivalent to POPIA.

While Navigare implements industry-accepted security measures, no method of transmission over the internet or electronic storage is completely secure. Accordingly, the absolute security of Personal Information cannot be guaranteed.

Navigare's procedures may require proof of identity before disclosing Personal Information or processing requests.

Data Breach Notification: In the event that Personal Information is unlawfully accessed, disclosed, destroyed, or otherwise compromised and where such compromise poses a reasonable risk of harm to the Data Subjects, Navigare will:

- promptly inform the affected Data Subject(s);
- report the incident to the Information Regulator; and
- provide, where reasonably practical, details of the breach, including when it occurred, the measures taken to identify and mitigate the breach, and the steps implemented to prevent recurrence.

Retention of Personal Information

Navigare determines retention periods based on legal, regulatory, and business requirements, and reserves the right to retain Personal Information for as long as necessary to:

- fulfil the purposes set out in this Privacy Statement,
- meet timelines prescribed or recommended by regulators, professional bodies, or associations,
- comply with applicable laws, legal holds, and other legal or contractual obligations, and
- address client requests.

When Personal Information is no longer required, for example, when a client no longer requires Navigare to fulfil its mandate, such information will be securely archived for a minimum period of at least five (5) years, or longer, where required by applicable South African legislation. Thereafter, the Personal Information will be permanently destroyed.

Personal Information Provided to Clients

In the course of providing Products and Services, Navigare may disclose Personal Information of third parties to clients. Such disclosure will occur only where lawful, in compliance with POPIA, and strictly to the extent necessary for the provision of the relevant Products and Services.

Children's privacy

Navigare's Products and Services are intended for professionals and individuals who are eighteen (18) years of age or older. Navigare does not target children and does not knowingly collect Personal Information from persons under the age of eighteen (18). Where an account is opened for a minor, Navigare requires that a competent person provides the necessary consent on behalf of the minor in accordance with the provisions of POPIA.

Direct Marketing

Navigare does not currently engage in any direct marketing practices.

Rights of Data Subjects

Data Subjects have several rights in terms of POPIA regarding their Personal Information. These rights may include:

- **Access to Personal Information** - the right to obtain confirmation as to whether Navigare processes Personal Information, and if so, the right to request access to such information. To the extent permitted by law, Navigare may charge a reasonable administrative fee for subsequent copies of the requested information.



- **Correction** - the right to request that Navigare correct inaccurate Personal Information, and, where appropriate, complete incomplete information.
- **Deletion/Destruction** - the right to request Navigare to delete or destroy some or all the Personal Information, subject to applicable legal and regulatory requirements.
- **Restriction of Processing** - the right to request that Navigare restrict the processing of Personal Information. In such cases, the Information will be marked as restricted and may only be processed for specific lawful purposes.
- **Objection to Processing** - the right to object, on reasonable grounds relating to a particular situation, to the processing of the Data Subjects' Personal Information. Upon receipt of an objection, Navigare will place a hold on any further processing until the objection has been resolved, unless processing is otherwise permitted by law.
- **Withdrawal of Consent** - the right to withdraw previously provided consent where processing is based on consent. Consent may be provided again at a later stage.
- **Right to Complain** - the right to lodge a complaint with Navigare's Information Officer, or directly with the Information Regulator if dissatisfied with Navigare's handling of the complaint. Complaints to the Information Regulator may be submitted via its website at <https://inforegulator.org.za/>. Click on Complaints and submit a ticket.
- **Revised Regulations (Effective April 2025)**
 - Objections and requests (including requests for correction, deletion, or destruction of Personal Information) may be submitted through multiple channels, including fax, post, email, SMS, and WhatsApp, or telephone.
 - Navigare may not charge any fee for any objection or request.
 - Navigare must respond to any objection or request, within 30 days.

Information Regulator- Contact Details



Procedure for Submitting a Request to Exercise Rights

To exercise any of the rights set out in this Privacy Statement, reference must be made to Navigare's PAIA Manual, available on our website (www.navigare.co.za) and at our registered office. The PAIA manual outlines the relevant procedures, required forms, and applicable fees.

When submitting a request, the requesting party must provide the following:

- **Specification of the Right Exercised:** A clear indication of the right being exercised and the Personal Information to which the request relates. Where a request is made on behalf of another individual, this must be specified together with proof of authority to act.
- **Context of the Relationship with Navigare:** Sufficient detail regarding the nature of the relationship with Navigare (e.g. client, supplier, service provider, or former employee).
- **Proof of Identity:** In line with the security procedures, proof of identity is required before any Personal Information is disclosed or a request is processed. Acceptable documentation may include a government-issued identity document, driver's license or other government-issued ID and/or a recent utility bill. Where initial verification is insufficient, additional documentation may be requested. If identity cannot be verified, the request may not be processed. Personal Information submitted for verification may be shared with authorized third-party service providers or government agencies strictly for this purpose.
- **Preferred Method of Response:** Unless otherwise specified, responses will be provided via email or through a secure online platform. Where another method of delivery is preferred, (such as physical mail or via an authorized account), this should be indicated at the time of submission.

Updates to this Privacy Statement

Navigare reserves the right to amend this Privacy Statement from time to time to reflect changes in business practices, operational requirements, or applicable legal regulatory obligations. Updated versions will be published on Navigare's website and will become effective upon publication.

