



PRIVACY POLICY

THE GLOBAL ADMINISTRATORS & PRIME INVESTMENTS GROUP OF
COMPANIES

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This policy is applicable to all legal entities within the Global Administrators and Prime Investments Group of Companies (hereafter referred to as “the Group”):

- **Global Administration Companies:**
 - Global Employee Benefits (Pty) Ltd
 - Global Financial Administrators (Pty) Ltd
 - Global Fund Administrators (Pty) Ltd
 - Global Independent Administrators (Pty) Ltd
 - Global Investment Administrators (Pty) Ltd
 - Global Nominees (Pty) Ltd
 - Global Payroll Services (Pty) Ltd
 - Ascent Capital (Pty) Ltd

- **Prime Investment Companies:**
 - PAI Holdings (Pty) Ltd
 - Prime Alternative Investments (RF) (Pty) Ltd
 - Prime Asset Managers (Pty) Ltd
 - Prime Collective Investment Schemes Management Company (RF) (Pty) Ltd
 - Prime Investment Management Services (Pty) Ltd
 - Prime Real Estate (Pty) Ltd
 - Prime Trade Finance (RF) (Pty) Ltd
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- **Retirement Funds**
 - Prime Preservation Pension Fund
 - Prime Preservation Provident Fund
 - Prime Retirement Annuity Fund
 - Prime Umbrella Pension Fund
 - Prime Umbrella Provident Fund
 - Prime Unclaimed Benefits Preservation Pension Fund
 - Prime Unclaimed Benefits Preservation Provident Fund

This policy is also applicable to associate companies (hereinafter referred to as “Associates”) in which the Group holds a limited shareholding, namely:

- Mashamba Asset Managers (Pty) Ltd.
- Orca Global Advisory (Pty) Ltd

1. PURPOSE OF THE POLICY

- 1.1 The purpose of this policy is to formally document the Group and its Associates’ commitment to respecting the privacy of their clientele, keeping any information provided – including the collection, use, disclosure and protection of personal information – confidential and adhering to the requirements and regulations of the “Protection of Personal Information Act” of 2013.

2. DEFINITIONS

- 2.1 **Personal Information** – For the purposes of this policy, “Personal Information” is defined according to POPIAA which states that Personal Information includes any information pertaining to:

- a) Race
- b) Gender
- c) Sexual affiliation and activity
- d) Pregnancy
- e) Marital Status

- f) National, ethnic and social groups
- g) Age
- h) Physical and Mental health
- i) Disability Status
- j) Religious and Personal Beliefs – including Matters of Conscience
- k) Language
- l) Birth Date
- m) ID Number
- n) Email Address
- o) Physical Address
- p) Telephone and Cell phone numbers
- q) Biometric Information and
- r) Correspondence of a personal or confidential nature
- s)

2.2 **POPIA:** Protection of Personal Information Act, No. 4 of 2013

2.3 **Processing of Information** – For the purposes of this policy, any reference made to processing activities is defined according to POPIA which states that the processing of information refers to any automatic or manual activities involved in:

2.3.1 Collecting, receiving, recording, organising, storing, updating, modifying, collating, retrieving, altering, consulting or using personal information.

2.3.2 Making personal information available by means of transmissions or distributions.

2.3.3 Merging, destroying, deleting or erasing personal information

3. CUSTOMER RIGHTS

3.1 As either a potential or existing customer, and in terms of POPIA, clients are afforded the following rights when it comes to the processing of personal information:

3.1.1 Clients will be notified when their personal information is collected.

3.1.2 Clients will be notified of any access to their personal information, including any access by unauthorized individuals/parties.

3.1.3 Clients may establish how their personal information is being held and may request access to that information at any time.

3.1.4 Clients may object to the processing of their personal information if they have valid grounds to do so.

3.1.5 Clients may object to any processing activities linked to direct marketing and refuse such processing.

3.1.6 Clients may submit a complaint to the Regulator of Information if they feel that POPIA has been contravened.

3.1.7 Clients may submit civil proceedings regarding any interference in terms of POPIA with the protection of your personal information.

4. COMMITMENT TO POPIA

- 4.1 The Group and its Associates' are fully committed to adhering to the rules and regulations of POPIA in their dealings with customers and in delivering services. It is the aim of the Group and its Associates to conduct business activities with the highest regard for personal information. The Group and its Associates recognise that customers place great trust in their systems and policies to protect customer privacy and the Group and its Associates will do all they can to honour that trust.
- 4.2 The Group and its Associates place specific emphasis on the following areas:
- 4.2.1 Maintaining conditions necessary to ensure legal and compliant processing of personal information.
 - 4.2.2 Processing any personal information defined as "special information" by POPIA.
 - 4.2.3 Adhering to any and all applicable codes of conduct.

5. PERSONAL INFORMATION

- 5.1 The Group and its Associates recognise that privacy is very important to clients and as such, they have the right to control the use of their personal information. Clients are more than welcome to visit the Group's website without divulging any personal information. However, that being said, it is also possible for clients to provide the Group and its Associates with personal information at the client's discretion.
- 5.2 If clients should choose to provide the Group and/or its Associates with information, clients will only be asked to provide the following information:
- 5.2.1 Name and surname.
 - 5.2.2 Contact email address.
 - 5.2.3 Contact number (this is optional).
- 5.3 Clients may view and update any and all personal information held by the Group and/or its Associates at any time by contacting instructions@globaladmin.co.za
- 5.4 Alternatively, if clients are unable to send an electronic request, they may contact the Group and/or its Associates in writing.

6. USE OF INFORMATION

- 6.1 Personal information is used in the normal course of business activities to provide a professional level of service to the client. This professional service includes:
- 6.1.1 The processing of any requests.
 - 6.1.2 Providing quality products and/or services.
 - 6.1.3 Notifying clients of any important changes in services.
 - 6.1.4 Complying with record-keeping requirements.

7. SHARING OF INFORMATION

- 7.1 All information provided to the Group and/or its Associates will be subject to the utmost confidentiality and will not be given or sold to third-parties. The Group and its Associates will however disclose personal information to their employees and management structure, insofar as this information is required to deliver the level of products and services expected of the Group and/or its Associates by their valued clientele.
- 7.2 In all other respects, no personal information will be shared, except where the Group and/or its Associates are required to do so by a court of law or any regulatory authority.

8. SECURITY OF INFORMATION

- 8.1 The Group and its Associates take all reasonable steps to protect the personal information of clients and keep any such information accurate and up-to-date. However, the Group and its Associates cannot guarantee the absolute security of electronically provided information. Utilizing electronic media to submit sensitive and personal information is done at the client's own risk.

9. ELECTRONIC COMMUNICATIONS

- 9.1 By visiting the Group's website, clients agree that all agreements, notices, disclosures and other forms of electronic communication satisfy any and all legal requirements, including but not limited to the need for such legal communications to be "in writing".

10. CONTACT INFORMATION

- 10.1 If clients have any questions or queries regarding the above policy, please feel free to direct such queries to instructions@globaladmin.co.za

11. CHANGES TO OUR PRIVACY POLICY

- 11.1 From time to time, it may be necessary for the Group to review and update this policy. The Group reserves the right to change the privacy policy at any time. The Group will notify clients of any changes by posting an updated version of this policy on their website.

ANNEXURE 1 – REVISION HISTORY

Detailed below is a list of policy versions and the changes/amendments/additions made to the policy with each new version:

DATE	VERSION	CHANGES
Dec 2013	1.0	“Privacy” policy established.
Aug 2014	1.1	- Complete format overhaul - Applicable Group entity breakdown included
Aug 2014	1.2	- Inclusion of “Customer Rights” - Inclusion of “Personal Information” - Inclusion of “Commitment to POPIA”
Aug 2015	1.3	- Inclusion of Prime Alternative Investments (Pty) Ltd in Group structure
Aug 2015	1.4	- Inclusion of PAI Holdings and Prime Asset Management (Pty) Ltd in Group structure. - GAA’s name is changed to Ascent Capital (Pty) Ltd.
Nov 2015	1.5	- Removal of the Unclaimed Retirement Funds from the Group structure. - Inclusion of Annexure A: Revision History
Sep 2016	1.6	- Global Employee Benefits (Pty) Ltd included in Group structure. - Inclusion of “Associates” in Group Structure. Policy reworded to make reference to both the Group and Associates where applicable. - Group structure amended to refer to “Prime Collective Investment Schemes Management Company (RF) (Pty) Ltd” and “Prime Alternative Investments (RF) (Pty) Ltd”. - Header formatting.
Aug 2017	1.7	- Global Financial Administrators (Pty) Ltd included in Group structure. - Global Investment Administrators (Pty) Ltd. included in Group structure. - Global Payroll Services (Pty) Ltd included in Group structure. - Global Nominees (Pty) Ltd - Ascent Capital (Pty) Ltd reclassified as an Associate company. - Numbering & format changes throughout document.
Nov 2017	1.8	- Format changes. - Prime Real Estate (Pty) Ltd. included in Group structure. - Prime Trade Finance (RF) (Pty) Ltd included in Group structure. - Unclaimed Funds included in Group structure. - Orca Global Advisory (Pty) Ltd. included as an Associate. - Annexure A amended to Annexure 1.
Dec 2018	1.9	- Ascent Capital (Pty) Ltd reclassified as a Group company.