INSTIT (PTY) LTD

PRIVACY POLICY

March 2025

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1. INTRODUCTION AND OBJECTIVE

At Instit (Pty) Ltd ("Instit"), we are committed to the principles of respecting your privacy and keeping your personal information safe. We will use, collect and safeguard your personal information as set out below and in accordance with applicable laws.

- We will only collect personal information that is of legitimate interest, and which is useful and necessary for improving our products, services and your experience
- We will maintain fairness and transparency at all times with regards to how we collect and process personal information at all times
- We will never sell your personal information
- We will never make decisions based solely on automated processing or profiling of personal information
- We will always take the security of your personal information seriously

This Policy applies to all areas within Instit where personal information is/are received and/or processed in connection with any services provided.

2. DEFINITIONS

Applicable laws	Means all legislation that Instit must adhere to, and it includes, but is not limited to, the Protection of Personal Information Act No 4 of 2013 ("POPIA"), the Financial Intelligence Centre Act No. 38 of 2001, the Collective Investment Schemes Control Act No. 45 of 2002, the Companies Act No 71 of 2008, and the Promotion of Access to Information Act No 2 of 2000 (" PAIA")
Personal information	Means information relating to an identifiable, living, natural person, and where applicable, and identifiable, existing juristic person, including, but not limited to: a. information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual

	orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth; b. information relating to education or the medical, financial, criminal or employment history; c. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment; d. biometric information; e. personal opinions, views or preferences; f. correspondence sent by you that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; g. views or opinions of another individual; and h. your name, if it appears with other personal information relating to you or if the disclosure of your name itself would reveal information about you.
Processing	Means any activity concerning personal information including: a. collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use; b. dissemination by means of transmission, distribution or making available in any other form; and c. merging, linking, as well as restriction, degradation, erasure, or destruction.
Special personal information	Means personal information concerning; a. religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information; and b. criminal behaviour to the extent that such information relates to: i. alleged commission of any offence; or ii. proceedings in respect of any offence allegedly committed by you or the disposal of such proceedings.
We, us or Instit	Means Instit, a financial services provider
You or your	Means any prospective, new, or existing client, supplier, employee, service provider, partner, and other stakeholders of Instit.

3. TYPES OF PERSONAL INFORMATION THAT WE COLLECT

3.1. Instit will collect and use only as much personal data from you as is necessary to be able to provide you with the products and services you have requested from us. You may provide us with your personal information where you enter your personal information via our website, engage with us in respect of our Services, or communicate with us by phone, email or otherwise. Depending on the services, products or information you may have requested, we may collect the following personal information:

3.1.1 name, address, contact details, date of birth, place of birth, identity number, passport number, email address, bank details, gender, children information, employment details, tax number, marital status and financial information;

3.1.2 records of correspondence or inquiries;

3.1.3 details of transactions;

3.1.4 details of contracts;

3.1.5 details available on third-party sanctions lists; and

3.1.6 special personal information, which may include images and voiceprints.

4. HOW WE COLLECT PERSONAL INFORMATION

We collect this information in a variety of ways but mainly directly from you when you contact us or request information from us where we are providing services to you, or we receive services from you including:

4.1. Information set out in any agreements entered into with us;

4.2. We may also collect your personal information from your appointed agent, any regulator, or other third party that may hold such information;

4.3. We may collect personal information from sanctions screening lists hosted by third parties;

4.4. We may, from time to time, receive information about you from other companies in our network, or from publicly available sources.

5. WHY WE COLLECT YOUR PERSONAL INFORMATION AND THE LEGAL BASIS

5.1 We may collect, transfer, share and otherwise process your personal information for, or relating to, the purposes of:

5.1.1 Fulfilling and provision of our services, products, or offerings you have requested, and

5.1.2 notifying you about important changes to these services, products, or offerings;

5.1.3 managing your account or our relationship and complying with your instructions or requests;

5.1.4 providing your personal information to our partners responsible for the management of the various portfolios;

5.1.5 detecting and preventing fraud, money laundering and terrorist financing risk in the interest of security and crime prevention;

5.1.6 assessing and dealing with complaints;

5.1.7 operational, marketing, auditing, legal and record keeping requirements;

5.1.8 verifying your identity;

5.1.9 verifying the identifies of beneficial owners of entities; and

5.1.10 carrying out marketing activities;

5.2 Instit only processes personal information on any of the following legal basis;

5.2.1 Consent;

5.2.2 for the conclusion and performance of a contract;

5.2.3 to comply with a legal obligation;

5.2.4 to protect a legitimate interest of a data subject;

5.2.5 for the proper performance of a public law duty; and/or

5.2.6 for the pursuance of a legitimate interest of Instit or 3rd party.

6. HOW WE KEEP YOUR INFORMATION SECURE

We store the information you provide about yourself in a secure database or when it concerns physical information in a secure location onsite and take appropriate security and technical measures to protect such information from unauthorized access. For example, we have adopted internal data protection procedures and trained our staff to prevent breaches of security. All electronic exchanges of information go through encrypted channels in order to prevent interception of your information. As Instit websites are grouped to the internet, which is inherently insecure, we cannot guarantee the information you supply will not be intercepted while being transmitted over the internet. Accordingly, Instit has no responsibility or liability for the security of personal information transmitted via our website.

7. DISCLOSURE OF YOUR PERSONAL INFORMATION

We will only disclose/share your personal information, when necessary, in accordance with applicable laws and regulations. We may disclose your information to the following third parties:

- Any person with legal or regulatory power that may require such disclosure on legal grounds;
- Service providers engaged by us to help us run our business and in order to effectively perform our Services; and
- Other entities in the Apex Group and/or its subsidiaries, agents, partners, sub-contractors (from time to time), for purposes as described in this privacy notice;
- to other persons as agreed with a client or as required or expressly permitted by applicable law;

Some of these third parties might be situated outside South Africa. When such personal information transfers are affected, we will take appropriate steps to ensure there is an adequate level of protection for personal information (which includes a legal agreement and appropriate security measures) in place in accordance with applicable legal requirements. Third parties are permitted to use the personal data only for the purposes which we have identified, and not for their own purposes, and they are not permitted to further share the data without our express permission.

8. RETENTION OF YOUR PERSONAL INFORMATION

We generally hold your personal data on our systems for as long as is necessary to provide the Services and as required by law. This is ordinarily 5 (five) years after the business relationship has been terminated in order to allow us to refer to your information in correspondence with you or relating to legal or regulatory proceedings.

9. YOUR RIGHTS

You have the following rights in relation to how we process your personal information:

- Right of access – you have the right to know if we are using your information and, if so, the right to access it and to receive information about how we are using your information;
- Right of correction – you have the right to, where necessary, to require us to rectify any errors in and/or update information we hold about;
- Right to request destruction or deletion – you have the right to require us to delete your information in certain circumstances if our continued use is not justified;

- Right to restrict processing – in some circumstances, although you may not be entitled to require us to erase your information but may be entitled to limit the purposes for which we can use your information;
- Right to object to the processing of your information for direct marketing purposes.

10. CHANGES TO THIS PRIVACY NOTICE

We will update this Privacy Notice when necessary to reflect changes in the law, our used practices and in our services, as well as to ensure it is accurate and up to date. When we make an update we will amend the date of this notice, you are therefore advised to check this Privacy Notice periodically. We may also notify you in other ways from time to time about the processing of your personal information.

11. COMPLAINTS

If you wish to make a complaint about how we have handled your personal information, you can contact our local Data Protection Manager. If you are not satisfied with our response or believe we are not processing your personal information in accordance with the applicable law you can lodge a complaint to:
Email: POPIAComplaints@inforegulator.org.za
Website: https://www.justice.gov.za/inforeg/

12. CONTACT US

Questions, comments and the exercise of your rights regarding this Privacy Notice and your personal information are welcomed and should be addressed to the Information Office by e-mail: bci_compliance@fundrock.com
If you have any questions or concerns about your personal information or our Policy, please contact the Information Officer.