

POPI POLICY
PYXIS INVESTMENT MANAGEMENT (PTY) LTD

An authorised Financial Services Provider FSP No: 662



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1. Introduction

- 1.1. In this Privacy Policy, Pyxis Investment Management (Pty) Ltd (registration number: 2017/237849/07) (FSP number: 662) means “Pyxis”, “we”, “our”, and its successors in title and assigns.
- 1.2. Pyxis is committed to safeguarding the privacy and personal information of visitors to our website.
- 1.3. Please read the following Privacy Policy to understand how your information will be treated. This policy may be updated from time to time, please check it regularly.
- 1.4. We recognise the importance of protecting your privacy in respect of your personal information (as defined in the Protection of Personal Information Act 4 of 2013, (“POPI”)) collected by us when you use this website.
- 1.5. You are not required to provide any personal information on the public areas of this website. However, you may choose to do so by completing the application forms on various sections of our website, including:
 - 1.5.1. When making contact with our partners and employees; and
 - 1.5.2. When making contact in respect of any questions you may have about this Privacy Policy.
- 1.6. In adopting this Privacy Policy, we wish to balance our legitimate business interests and your reasonable expectation of privacy. Accordingly, we will take appropriate and reasonable technical and organisational steps to prevent unauthorised access to, or disclosure of your personal information.
- 1.7. By continuing to use this website:
 - 1.7.1. You agree that we may “collect, collate, process and/or store” your personal information (as defined in POPI) (“process”) for, the purposes set out in this Policy including providing you with access to the website and the website content.
- 1.8. Where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify the relevant regulator and you, unless a public body responsible for detection, prevention or investigation of offences or the relevant regulator informs us that notifying you will impede a criminal investigation.

2. What types of personal information do we process?

- 2.1. The types of personal information that we may process includes (amongst other things):
 - 2.1.1. Your name and surname, identity or passport numbers, e-mail and physical addresses, postal address, contact information, information relating to your occupation and information relating to the pages of the website viewed by you.
- 2.2. We will limit the types of personal information we process to only that to which you consent and which is necessary for our legitimate business interests.

3. *When will we process your personal information?*

- 3.1. Personal information may be processed when you:
 - 3.1.1. complete the relevant application form on our website to subscribe or register;
 - 3.1.2. browse the website;
 - 3.1.3. complete our risk profile forms and contract documents.
- 3.2. You acknowledge that all personal information processed by us may be stored by us and used for purposes specified in this Privacy Policy.

4. *How do we use your personal information?*

- 4.1. We will only use the information you provide to us on the above sections of the website in order to process the relevant application or registration form.
- 4.3. Risk profile information and contract document information will be used for the reasons specified in those documents which you agree to by signing the documents.
- 4.2. We will not retain your information longer than is necessary to achieve the purpose for which the information was collected and processed unless we are required to do so by law or there is a lawful purpose to retain your information for a longer period.

5. *Sharing of your personal information*

- 5.1. You consent that we may disclose your personal information to firm approved third party providers (as referred to below in 5.2.1), where necessary and only for the purpose agreed to by yourself in our risk profiling documents and contract documents which you have signed;
- 5.2. You agree that once your information has been de-identified, i.e.: any information that identifies you has been deleted, personal information may be shared under the following circumstances:
 - 5.2.1. To our agents, advisers, service providers and suppliers (our SEO agency, creative, brand, digital and media agencies, Microsoft, Google and other research agents);
 - 5.2.2. To monitor web traffic: web servers serving the website automatically collect information about pages you visit. This information is used for internal review, to tailor information to individual visitors and for traffic audits;
 - 5.2.3. For statistics purposes: we may perform statistical analyses in order to measure interest in the various areas of the website (for product development purposes);
 - 5.2.4. To government and law enforcement agencies, where the law requires that we disclose your personal information to a party, and where we have reason to believe that a disclosure of personal information is necessary to identify, contact or bring legal action against a party who may be in breach of the Privacy Policy or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else that could be harmed by such activities.

6. How do we protect your personal information

- 6.1. We make use of reputable service providers to ensure care is taken with regards to protection of information, as well as restoration of data in the case of technical glitches or erroneous mishaps. Client data is primarily stored in two locations, namely the cloud-based server and our internal CRM system (Gamma).
- 6.2. Information regarding our systems and the measures maintained for protection of personal information by them can be provided to you upon request from us at popi@pyxis-im.com.

7. Your rights

- 7.1. You have the right to request that we correct, destroy or delete any of your personal information that we have processed in accordance with this policy. The personal information that you may request us to correct, destroy or delete is personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or that we are no longer authorised to retain.
- 7.2. You have the right to withdraw your consent for us to process your personal information at any time. The withdrawal of your consent can only be made by you on condition that:
- 7.2.1. The withdrawal of your consent does not affect the processing of your personal information prior to the withdrawal of your consent;
 - 7.2.2. The withdrawal of your consent does not affect the processing of your personal information if the processing is in compliance with an obligation imposed by law on us;
 - 7.2.3. The withdrawal of your consent does not affect the processing of your personal information where such processing is necessary for the proper performance of a public law duty by a public body;
 - 7.2.4. The withdrawal of your consent does not affect the processing of your personal information as required to finalise the performance of a contract in which you are a party; or
 - 7.2.5. The withdrawal of your consent does not affect the processing of your personal information as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third party to whom the information is supplied.
- 7.3. You have the right to object to the processing of your personal information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law.
- 7.4. You can make the objection if the processing of your personal information is not necessary for the proper performance of a public law duty by a public body; or if the processing of your personal information is not necessary to pursue your legitimate interests; our legitimate interests or the legitimate interests of a third party to which the information is supplied.
- 7.5. You have the right to object to the processing of your personal information, at any time, if the processing is for purposes of direct marketing including direct marketing by means of unsolicited electronic communications in terms of which you have not given your consent for that processing.
- 7.6. You have the right not to have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications from third parties unknown to you.

- 7.7. You have the right not to be subjected to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of you.
- 7.8. Decisions that you may not be subjected to are decisions that result in legal consequences for you or affect you to a substantial degree:
- 7.8.1. Excluding the execution of a contract that you have received performance for;
or
- 7.8.2. Decisions made that are not in terms of law or of a code of conduct that specifies what appropriate measure must be taken to protect your legitimate interests.
- 7.9. You have the right to submit a complaint to the Information Regulator (once fully operational) regarding an alleged interference with the protection of personal information processed in accordance with this policy.
- 7.10. You have the right to institute civil proceedings regarding an alleged interference with the protection of your personal information processed in accordance with this policy.

8. Use of cookies

- 8.1. Cookies are pieces of information a website transfers to a user's hard drive for record-keeping purposes. Cookies make surfing the web easier for you by saving your preferences and tracking your online habits, traffic patterns, and making sure you do not see the same advertisement too often. The use of cookies is an industry standard.
- 8.2. We may place a cookie on your browser to store and sometimes track the information referred to above in 7.1.
- 8.3. While most browsers are initially set up to accept cookies, you can reset your browser to refuse all cookies or indicate when a cookie is being sent. Please note that some parts of the website will not function properly if you refuse cookies.

9. Use of IP address

- 9.1. An Internet Protocol (IP) address is a number that is automatically assigned to a computer whenever it is connected to the Internet. We log IP addresses or the location of computers on the Internet.
- 9.2. We collect IP addresses for the purposes of system administration and to audit the use of the website. We do not link IP addresses to personal information unless it becomes necessary to enforce compliance with the Privacy Policy or to protect our website or its users.

10. Links to other sites

- 10.1. When you are using the website, you could be directed to other sites that are beyond our control. We are not responsible for the content or the privacy policies of those third-party websites.

11. Contact Information

- 11.1. If you have any questions in relation to this Privacy Policy please contact us at: popi@pyxis-im.com.
- 11.2. If you currently receive marketing information from us which you would prefer not to receive in the future please email us at popi@pyxis-im.com.