

OPPENHEIMER PARTNERS AFRICA ADVISORS PROPRIETARY LIMITED
PRIVACY POLICY

1 INTRODUCTION

- 1.1 We understand that your privacy and the security of your personal information is extremely important. This policy sets out what we do with your personal information, what we do to keep it secure, from where and how we collect it, as well as your rights in relation to the personal information we hold about you.
- 1.2 This policy applies if you interact with us.
- 1.3 If you don't want to read all the detail, here are the things we think you'd really want to know:
 - 1.3.1 We share your personal information with third parties where it is necessary to perform our functions.
 - 1.3.2 We use a number of third parties to process your personal information on our behalf linked to the purpose(s) for which we collected your personal information.
 - 1.3.3 You have a number of rights over your personal information and the different ways in which you can exercise those rights is set out in this notice under paragraph 7.

2 WHO ARE WE?

When we say “**we**” or “**us**” in this policy, we are referring to Oppenheimer Partners Africa Advisors Proprietary Limited.

3 WHAT SORTS OF PERSONAL INFORMATION DO WE HOLD?

In order to offer you services and products we will collect, hold and use the following personal information –

- 3.1 information that you provide to us such as your name, address, identification number, telephone number, email address, and any feedback you give to us, including by phone or email;
- 3.2 information about the functions we perform (including for example, the things we have provided to you, when and where, and so on);
- 3.3 your profile with us, including your email address;

3.4 your contact details and details of the emails and other electronic communications you receive from us, and how you interact with them. For example whether the communication has been opened, if you have clicked on any links within that communication and the device you used. We do this because we want to make sure that our communications are useful to you, so if you don't open them or don't click on any links in them, we know we need to improve our services.

4 **OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION**

Whenever we process your personal information we have to have something called a "legal basis" for what we do. The different legal bases we rely on are –

4.1 **Consent** -You have told us you are happy for us to process your personal information for a specific purpose(s).

4.2 **Legitimate interests** - The processing is necessary for us to conduct our business, but not where our interests are overridden by your interests or rights.

4.3 **Legal obligation** - We are required to process your personal information by law.

5 **HOW DO WE USE YOUR PERSONAL INFORMATION?**

We may use your information in the following ways –

5.1 **To perform our functions** - we need to use your personal information to perform our function.

5.2 **Contacting you** - we use your personal information to contact you.

6 **PERSONAL INFORMATION SHARING**

We may share information about you with –

6.1 companies or third parties affiliated to us;

6.2 partners or agents;

6.3 companies who are engaged to perform services for or on our behalf;

- 6.4 law enforcement agencies, regulatory organisations, courts or other public entities if we are required by law to do so;
- 6.5 emergency services; and
- 6.6 with any entity or forum wherein we may protect ourselves against fraud or exercise our rights.

7 YOUR RIGHTS

7.1 You have a number of rights under data protection legislation which, in certain circumstances, you may be able to exercise in relation to the personal information we process about you.

7.2 These include –

7.2.1 the right to access a copy of the personal information we hold about you;

7.2.2 the right to correction of inaccurate personal information we hold about you;

7.2.3 the right to restrict our use of your personal information;

7.2.4 the right to be forgotten; and

7.2.5 the right to object to our use of your personal information.

7.3 Where we rely on consent as the legal basis on which we process your personal information, you may also withdraw that consent at any time.

If you are seeking to exercise any of these rights, please contact our Information Officer at InformationOfficer@oppenheimer-partners.com. Please note that we will need to verify your identity before we can fulfil any of your rights under data protection law. You may also refer to our PAIA and POPIA Manual (which is available upon request to our Information Officer) for details.

8 AUTOMATED DECISION MAKING AND PROFILING

We do not use any purely automated processing processes to bring about a decision – including profiling – on the establishment, implementation or termination of an employment relationship.

9 HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION FOR?

We will keep your personal information for the purposes set out in this privacy policy and in accordance with the law and relevant regulations. We will never retain your personal information for longer than is necessary.

10 SECURITY

We take protecting your personal information seriously and are continuously developing our security systems and processes. Some of the controls we have in place are –

- 10.1 we limit physical access to our buildings and user access to our systems to only those that we believe are entitled to be there;
- 10.2 we use technology controls for our information systems, such as firewalls, user verification, strong data encryption, and separation of roles, systems and data;
- 10.3 we utilise industry standards to support the maintenance of a robust information security management system; and
- 10.4 we enforce a “need to know” policy, for access to any data or systems.

11 CONTACT US

If you would like to exercise one of your rights as set out in the “Your Rights” section above, or you have a question or a complaint about this policy, or the way your personal information is processed, please contact our Information Officer at InformationOfficer@oppenheimer-partners.com.

12 INFORMATION REGULATOR (SOUTH AFRICA)

The Information Regulator (South Africa) is an independent body established in terms of section 39 of POPIA. The Information Regulator is empowered to monitor and enforce compliance by public and private bodies with the provisions of the POPIA Act. They may be accessed at –

- 12.1 JD House
27 Stiemens Street
Braamfontein
Johannesburg, 2001

12.2 **Contact:** infoereg@justice.gov.za or
Complaints: complaints.IR@justice.gov.za

13 **POLICY REVISION**

This privacy policy is subject to review and amendment without prior notice. However, we undertake to ensure that any amendments hereto are communicated on our publicly available platforms such as our website, for the benefit of the general public, our customers, and any other persons who may be affected by this policy.

14 **VERSION CONTROL**

Last updated June 2021.