



**LAURIUM
CAPITAL**

Privacy Policy

What Personal Information does Laurium require?

1. Laurium Capital (Pty) Ltd ("Laurium")'s Protection of Personal Information Policy ("POPI Policy") governs the Processing of Personal Information. **The policy can be viewed by contacting the Information Officer, Zayaan Saban, on zayaan.saban@lauriumcapital.com or on 011 263 7700.**
2. "Personal Information" is defined in the Protection of Personal Information Act (Act no. 4 of 2013) ("POPI Act") as follows:

Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

 - a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;
 - b) information relating to the education or the medical, financial, criminal, or the employment history of the person;
 - c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - d) the biometric information of the person;
 - e) the personal opinions, views or preferences of the person;
 - f) correspondence sent by the person, that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - g) the views or opinions of another individual about the person; and
 - h) the name of the person if it appears with other personal information relating to the person or if the

disclosure of the name itself would reveal information about the person.

3. "Processing" is defined in the POPI Act as follows:

any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—

- a) the 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 form; or
 - c) merging, linking, as well as restriction, degradation, erasure or destruction of information.
4. Laurium is a Responsible Party in respect of the Personal Information provided to us. Laurium may process the following types of Personal Information:
- a) Identification document;
 - b) Proof of residential/business operating address;
 - c) South African Income Tax registration number;
 - d) South African VAT registration number (if applicable per individual/legal entity);
 - e) Contact numbers;
 - f) E-mail addresses;
 - g) Banking details;
 - h) Qualification records;
 - i) CIPC documents;
 - j) Details of BO's and PEP's, as required by the Financial Intelligence Centre Act ("FIC Act").

Why does Laurium require your Personal Information?

- 1. Laurium only processes Personal Information when it has a legitimate reason to do so and in order to adhere to applicable laws such as the Financial Advisory and Intermediary Services Act ("FAIS Act") and the FIC Act.
- 2. Laurium needs Personal Information:
 - a) when establishing a legal relationship with clients;
 - b) when populating client account information required on the various on-boarding platforms;
 - c) when capturing contact information related to discretionary mandates/ accounts; and
 - d) when onboarding employees.

How is your Personal Information Processed?

- 1. Personal Information is Processed at Ninth Floor, 90 Grayston Drive, Sandton 2031 as well as at our Cape Town Office, situated at Fourth Floor The Osborne, 1 Osborne Road, Claremont 7708.
- 2. No third-party providers have direct access to Personal Information unless specifically required by law or to satisfy client due diligence principles.

How long does Laurium keep your Personal Information?

1. Laurium retains Personal Information for a period of five (5) years following the date of termination of the business relationship. Thereafter, the information is destroyed, deleted, or de-identified (whichever is applicable), as soon as reasonably practicable.

What are your rights?

2. Should you believe that any of your Personal Information is incorrect or incomplete, you have the right to request to view this information, rectify it or have it deleted. Please contact the Information Officer, Zayaan Saban, on zayaan.saban@lauriumcapital.com or on 011 263 7700, should this be required.
3. In addition, if you wish to complain about how Laurium has handled your Personal Information, please contact the Information Officer, Zayaan Saban, on zayaan.saban@lauriumcapital.com or on 011 263 7700.
4. If your query relating to your Personal Information is not, in your opinion, adequately dealt with, you can contact the Information Regulator on 012 406 4818 or infoereg@justice.gov.za to file an official complaint.

Review History			
Responsible Person	Date	Reviewed	Approved
Zayaan Saban	April 2025	Veld and Cooper	Head Governance