POLARSTAR MANAGEMENT PTY LTD.

STANDARD POPI ACT POLICY STATEMENT

August 2023

POLARSTAR

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DOCUMENT CONTROL

Version	Date	Change Details:
1.0	2021	Creation
2.0	August 2023	Annual Review

1. INTRODUCTION

The Protection of Personal Information Act No 4 of 2013 ("the Act") is aimed at giving effect to the constitutional right to privacy by safeguarding personal information and regulating how personal information must be processed.

This POPI Policy explains how we will obtain, use, and disclose your personal information, as is required by the Protection of Personal Information Act (The Act). This policy sets out:

- Who we are;
- Personal Information collected;
- How we use your information;
- Purpose of Processing and Legal Basis for Processing;
- Recipients of Personal Information;
- Your rights to access and correct your Personal Information;
- Retention Period;
- How to Contact Us.

2. WHO WE ARE

PolarStar Management (Pty) Ltd. ("PolarStar" or "Company") is a private body registered financial services provider with FSP No. 45053 that transacts business in the following license categories:

The Company provides advice and intermediary services by making direct or indirect recommendations to clients or by providing research or opinions on financial services and by providing the associated intermediary services and support. The Company is compensated for providing this analysis and advice. The FSP services institutional clients only.

3. DEFINITIONS

"Data Subject or Client" means the person to whom personal information relates;

"Information Officer" of, or in relation to, a—
(a) public body means an information officer or deputy information officer as contemplated in terms of section 1 or 17 of The Act; or
(b) private body means the head of a private body as contemplated in section 1, of the Promotion of Access to Information Act;

"Personal Information" means 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, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
(b) information relating to the education or the medical, financial, criminal or 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;

"Processing" means 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 other form; or
(c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

4. PRIVACY POLICY STATEMENT

PolarStar understands the importance of respecting and protecting your Personal Information. We acknowledge that it is also a Constitutional right, legal and good business practice requirement, which PolarStar takes very seriously.

In line with the 8 Conditions in the Act, PolarStar:

- Accepts joint responsibility and accountability with you to responsibly manage and protect your Personal Information responsibly when providing our services and solutions to you;
- Undertakes to receive, only from you, and process the Personal Information that is absolutely necessary for the purpose of assisting you with your required solutions, conclude the necessary related agreements and consider the legitimate legal interests of everyone concerned, as required by the Act and to respect your right to withdraw your consent for the processing of your Personal Information;
- Undertakes to only use your Personal Information for the purpose required to assist you or provide solutions to you;
- Undertakes not to share or further process your Personal Information with anyone if not required to assist you with your solutions or by the law;
- Undertakes to be open and transparent and notify you as and when required by the law regarding why and how your Personal Information needs to be collected;
- Undertakes to safeguard and protect your Personal Information in our possession;
- Undertakes to freely confirm what Personal Information we have, to update and correct the Personal Information and to keep it for no longer than legally required.

5. PERSONAL INFORMATION COLLECTED

We collect information directly from you where you provide us with your Personal Information.

Examples of personal information we collect include, but is not limited to:

- Personal Information provided by you (including within forms, correspondence, transactions and remittance instructions) to PolarStar including: your name, address, contact information, birth date, gender, nationality, photograph, signature, occupational history, job title, income, assets, other financial information, source of funds, bank details, credit and investment history, source of funds, tax residency, and tax identification information;
- Personal Information collected or generated by PolarStar including: information related to your emails (and related data), correspondence, call recordings, and website usage data; and Personal Information obtained by PolarStar from other sources, including: know your client (Know Your Client) ("KYC") / client due diligence procedures (anti-money laundering ("AML"), counter-terrorist financing, proliferation financing, sanctions, politically exposed persons), tax purposes (US Foreign Account Tax Compliance Act ("FATCA"), OECD Common Reporting Standard ("CRS"), future regulatory, securities and tax requirements, information from public websites, public sources of information (bankruptcy registers, credit reference agencies), publicly accessible directories, and information received from your advisors or intermediaries.
- For non-individual subscribers: Information concerning individuals connected with you (such as your directors, trustees, employees, representatives, investors, clients, beneficial owners and/or agents).

- Recruitment related data and information on your personnel file – These include your name, signature, postal address, nationality, email address, fax number, date and place of birth, nationality, curriculum vitae, bank account details, tax identification, credit history, signatures, references, work and educational history, interview notes and other contact details, right to work documentation, your social security number (or equivalent); passport number; utility bills, photographic identification and verification such as copies of your passport, passport number, gender, driver's license and address verification, photographs, working hours, annual leave and other holiday records, emergency contact details, marital status, next of kin and family details.
- Payroll information – These include your bank account details, salary arrangements, bonus entitlements and tax allowances.
- Medical information and pension details – These include sick certificates, medical records, sick leave records, sick pay records, occupational health assessments and pension details.
- Termination of our relationship – These include resignation letters, exit interviews, and reference letters.
- Special categories of more sensitive personal information – Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions, membership of a trade union or equivalent industrial relations body, information about your health, including any medical condition, health, and sickness records, genetic information, and biometric data.

We may collect and process personal data relating to you in connection with our relationship, such as via correspondence and calls, and in connection with our relationship with you. Telephone calls with you may be recorded for the purposes of record keeping, security and training.

In addition, we may collect personal data relating to you from third party sources such as specialist databases in connection with complying with legislation relating to anti-money laundering, taxation, and other legislation or from other specialist databases or sources for vetting or screening purposes or fitness and probity assessments or from employment or credit reference agencies or previous employers.

6. PUPORSE OF PROCESSING AND LEGAL BASIS FOR PROCESSING

PolarStar collect, use and keep your Personal Information as prescribed by relevant laws and regulations and for reasons such as:

- To share with and provide relevant products or services to you; to carry out the transaction you requested and to maintain our relationship;
- To respond to your queries;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- To conduct credit reference searches or verification, only if you authorise this or if it's a requirement to provide your solutions to you;
- For operational purposes required to assist you with the solutions you require;
- For audit and record keeping purposes;
- In connection with possible requirements by the Information Regulator or other Government agency allowed by law, legal proceedings or court rulings.

7. RECIPIENTS OF PERSONAL INFORMATION

Your Personal Information may be disclosed to various recipients in connection with the above purposes, including:

- The Boards of PolarStar and (in circumstances where there is legitimate interest, performance of a contract or legal obligation) other employees;
- The Fund's administrator and its affiliates;
- the Fund's custodians, sub-custodians, and brokers;
- the Fund's bankers;
- Regulatory authorities, upon request or as required by applicable law;
- payroll providers, pension and health insurance providers, pensions trustee;
- relevant tax authorities as required by applicable law;
- applicable regulators, which may include the FSCA, SARS, auditors, or other competent governmental or regulatory authorities, trade unions or equivalent industrial relations body and bodies as requested or required by law;
- Other third parties who we engage to provide services to us, such as financial institutions acting on behalf of the Funds, professional advisers, independent investigators, occupational health specialists, legal advisers, auditors, and IT service providers;
- To screening and other reference agencies in order to carry out money laundering and identity checks and to comply with legal obligations;
- Other members of our corporate group (if applicable) or the corporate groups of the entities referred to above, as well as affiliates, agents, and delegates, both within and South Africa; and
- In the context of a business or group company sale, re-organisation or restructuring or corporate finance activities.

POLARSTAR MAY DISCLOSE YOUR PERSONAL DATA AS FOLLOWS:

- to their affiliates, delegates and third-party service providers engaged in connection with the oversight, safekeeping, administration, distribution, or operation of PolarStar, in order to process the Personal Information for the above-mentioned purposes;
- PolarStar professional advisors, auditors, IT, and other service providers; and
- to competent authorities (including tax authorities), regulators, courts, law enforcement agencies, and other regulatory entities as required by applicable law or requested by such entities, or third-party service providers for internal investigations and reporting purposes.
- to their affiliates, delegates and third-party service providers engaged in connection with the oversight, safekeeping, administration, distribution, or operation of PolarStar, in order to process the Personal Information for the above-mentioned purposes;

In relation to any other third parties, we will only disclose your information in the following circumstances:

1) where you have given your consent;
2) where we are required to do so by law or enforceable request by a regulatory body;
3) where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights; or
4) if we transfer management or control of the Funds.

8. RIGHT TO ACCESS AND CORRECT YOUR PERSONAL INFORMATION

Clients have the right to access the personal information PolarStar holds about them. Clients also have the right to ask PolarStar to update, correct or delete their personal information on reasonable grounds. Once a client objects to the processing of their Personal Information, we may no longer process said Personal Information. We will take all reasonable steps to confirm our clients' identity before providing details of their personal information or making changes to their personal information.

The details of PolarStar's Information Officer are as follows:

INFORMATION OFFICER DETAILS

Name	Herman Verwey
Telephone number	+27 21 409 7109
E-mail address	info@polarstarfunds.com

COMPANY CONTACT DETAILS

FSP Name	Polar Star Management (Proprietary) Limited
Registration Number	2012/070886/07
Postal Address	185 Bree Street, Cape Town, South Africa, 8001
Physical Address	185 Bree Street, Cape Town, South Africa, 8001
E-mail	herman@polarstarfunds.com
Office Telephone Number	+27 21 409 7109
Website	www.polarstarfunds.co.za

Our Client's also have the right to ask us to update, correct or delete Personal Information. You may do this by contacting PolarStar on the company contact details listed above and requesting the correction or deletion of any information we hold. We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.

9. RETENTION PERIOD

PolarStar will retain your Personal information for the duration of our relationship and for such a period of time after the relationship ends as is necessary to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise.

10. HOW TO CONTACT US OR THE INFORMATION REGULATOR

If you have any questions about the use of your personal data, your data protection rights or if you want to exercise those rights, please contact info@polarstarfunds.com.

Any additional information or concerns can be found and raised with the Information Regulator, who can be contacted as shared below, but please feel free to contact us first to discuss any questions or concerns you may have:

Website: Home - Information Regulator (inforegulator.org.za)

Tel: 010 023 5200

Email: enquiries@inforegulator.org.za