

Protection of Personal Information (POPI) Policy



Kaon Capital (Pty) Ltd
Reg. No.: 2014/269215/07

and



Kaon Investment Management (Pty) Ltd
An authorised Financial Services Provider (FSP No: 48460)
Reg. No.: 2017/242347/07

hereafter referred to as “Kaon”.

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Last reviewed and/or updated	19 October 2023
Version	3.0
Policy owner	Michael Toplis
Approved by	Luke Alers
Reviewed by	Nadine Jeffreys

1. PERSONAL INFORMATION

1. Personal information is collected only when an individual knowingly and voluntarily submits information. Personal Information may be required to provide an individual with further services or to answer any requests or enquiries relating to this service.
2. It is Kaon's intention that this policy will protect an individual's personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.
3. Kaon collects, stores and uses the personal information provided by a natural/juristic person, to provide financial services.

2. USE OF INFORMATION

1. Kaon needs to collect personal or other information
 - a. Conducting credit reference searches or verification;
 - b. Confirming and verifying an individual's identity;
 - c. For credit assessment and credit management;
 - d. For the detection and prevention of fraud, crime, money laundering or other malpractice;
 - e. Conducting market or customer satisfaction research;
 - f. For audit and record keeping purposes;
 - g. In connection with legal proceedings;
 - h. Follow an individual's instructions;
 - i. Inform an individual of services;
 - j. Make sure Kaon's business suits the individual's needs.
2. Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information are stored in archives for record-keeping and back-up purposes only.
3. Kaon will not, without an individual's consent, share information with any other third parties, other than where required by law for any purposes whatsoever.

3. SECURITY

1. Kaon strives to ensure the security, integrity and privacy of personal information submitted. Kaon will review and update its security measures in accordance with future legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure. However, Kaon will endeavour to take all reasonable steps to protect the personal information, which an individual submits to Kaon or to Kaon's online products and services. Kaon will always set the highest standards to ensure the integrity of their systems.
2. Kaon may engage with other organisations to provide support services to Kaon. Third Parties are obliged to respect the confidentiality of any personal information held by Kaon. A Service Level agreement is in place with all Third parties to ensure adherence to all Privacy Policies.
3. Kaon's employees are obliged to respect the confidentiality of any personal information held by Kaon. All employees are required to sign an employment contract which includes a confidentiality clause.

4. Kaon will not reveal any personal information to anyone unless:
 - a. It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law;
 - b. It is in the public interest;
 - c. Kaon needs to do so to protect their rights.
5. Kaon endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date. If at any time, an individual discovers that information gathered about them is incorrect, they may contact Kaon to have the information corrected.
6. Kaon recognises the importance of protecting the privacy of information collected about individuals, specifically personal (identifying) information.

4. CONTACT INFORMATION

Any questions relating to Kaon's privacy policy or the treatment of an individual's personal data may be addressed to the contact details below:

Information officers: Gregory Ronaldson (Key Individual for Kaon Investment Management)
Nadine Jeoffreys (Information Officer for Kaon Investment Management)
Nadine Jeoffreys (Compliance Officer for Kaon Capital)

Telephone number: +27 (0)10 005 0834/5

Postal address: PO Box 130102
Bryanston
2074

Physical address: 6 Blackpool Road
Bryanston
2191
South Africa

Email address: info@kaoncapital.com

Website: www.kaoncapital.com