



SYGNIA GROUP

PRIVACY AND SECURITY POLICY

MARCH 2015



PRIVACY AND SECURITY POLICY

Integrity and confidentiality in all our business relationships is of paramount importance to Sygnia. Whilst obtaining accurate and timely information about our investors is important to our ability to deliver a high level of service to our investors, we respect your privacy and are committed to keeping your information confidential.

The protection of all information acquired from you in connection with your use of our website is safeguarded by a set of procedures detailed below. We also undertake not to use or distribute your personal information in any other way without notifying you in advance, via the provision of supplemental privacy policies and statements or otherwise, and giving you adequate opportunity and means to respond.

COLLECTION OF PERSONAL INFORMATION

In general, you can visit our website without having to disclose any personal information about yourself.

The personal information we collect relating to you comes primarily from the information and materials you supply to us in connection with your use of this site. We may also collect information about your transactions and experiences over time as you use this site. This is done through the use of "cookies".

Cookies are small text files consisting of encrypted information assigned to a computer's browser, which is given to your browser by our web server when you visit our website. This data is stored on your browser. The cookie is sent back to our web server each time you visit our website. Cookies are not computer programs and do not run on a computer like programs do. They cannot gather information or function on their own. They cannot collect any personal information about you or your machine and cannot gather data or information about what you do on the Internet. Cookies merely enable us to provide a more effective and customized online service to you. While you can set up your Internet browser to disable cookie technology, we do not recommend that you do this since some parts of this website and our online services may not function properly, or at all. Users of the non-public areas of our website (online services) may be required to identify and authenticate themselves prior to accessing our services. Generally, identification and authentication take place through the use of your password.

We also gather and analyse information on our visitors' routine visits to this website. We use this information to monitor the areas of the website which are used most frequently and use this knowledge to enhance the website development in future. This information is pooled personal information, behaviour or patterns cannot be identified.

ACCESSING OF PERSONAL INFORMATION

Access to your personal information as retained by Sygnia is governed by the Promotion of Access to Information Act, 2 of 2000. For more details please refer to the relevant section of the website.

USE OF PERSONAL INFORMATION

Personal information is used during our normal course of business to provide the relevant information or services to you as per your request.

We may retain any of this information for the purposes of investment transaction processing and administration, to monitor our website and to communicate with you directly. This allows us to tailor our content and provide you with more relevant information. Please advise us should you to use this information as a basis for further contact.

CONFIDENTIALITY OF INFORMATION

Sygnia respects your rights to privacy and confidentiality of your information and consequently undertakes not to sell or exchange personal information with any third party outside of the Sygnia group of companies for any purpose whatsoever. However, Sygnia reserves the right to disclose or report personal information in limited circumstances where it is believed in good faith, that disclosure is required under law (included but not limited to a violation or suspected violation of the Prevention of Organised Crime Act and the Financial Intelligence Centre Act), to co-operate with regulators or law enforcement authorities, to perform necessary credit checks or collect or report debts owed to Sygnia, to protect its rights or property, or to disclose information on reasonable request by the fund in which the investor has invested.

Only authorised Sygnia employees or agents will have access to your personal information. All of our employees, service providers and marketing partners are held to stringent standards of privacy and security and are bound by confidentiality agreements.

SECURITY OF INFORMATION

Sygnia is committed to protecting the privacy and confidentiality of your personal information. We take every reasonable step to protect your personal information, including the use of encryption technology. We cannot, however, guarantee the security of any information you transmit to us electronically and you do so at your own risk.

LIMITATION OF LIABILITY

The Privacy and Security Policy does not form part of Sygnia's Terms and Conditions of Use. It is however recommended reading for all website users for information purposes. Whilst every reasonable care has been taken to ensure the accuracy of the information contained in the above policy, Sygnia does not guarantee its accuracy or that it will remain accurate as technology changes.

Sygnia shall not be liable for any losses or damages suffered arising from reliance being placed upon any of the contents of the above policy. We reserve the right to amend our privacy and security policy at any time. All amendments to the Privacy and Security Policy will be posted on the website. Unless otherwise stated, the current version shall supersede and replace all previous versions of this privacy and security statement.

If you have any questions about our Privacy and Security Policy please email us on info@sygnia.co.za.