



PRIVACY POLICY

Cape Capital Group (Pty) Ltd.

FSP: 50206



THE PROTECTION OF CLIENT DATA AS PRESCRIBED IN THE PROTECTION OF PERSONAL INFORMATION ACT AND AUGMENTED BY THE COMPANY'S STANCE ON THE FAIR TREATMENT OF CUSTOMERS.

This is the corporate website of the Cape Capital Group (Pty) Limited ("the Company").

The Company is an authorized Financial Service Provider by the Financial Sector Conduct Authority (FSCA) in South Africa. The Company is listed under the FSP No. 50206 and under the Registration No. 2019/142922/07.

Policy Statement

We respect your privacy and are committed to protecting your personal data. In order for the Company to provide you with our services, the Company is required to collect, gather and process personal data about you and your activity. We will ensure that the personal data that we may collect, gather and process from you will be stored and kept with confidentiality and these will be processed for no other purpose but only when required by law or in accordance with the terms of this Privacy Policy.

This Privacy Policy ("Policy") will inform you as to how we look after your personal data when you visit our website at <https://capecapitalgroup.co.za> (regardless of where you visit it from) or any other websites, pages, features, or content we own or operate and/or when you use our mobile app or any Cape Capital Group (the "Company") application programming interface (collectively, the "Interface") or the services offered by the Interface ("Services").

The Company is committed to comply with the applicable laws related to the General Data Protection Regulation (EU) 2016/679 ("GDPR"). The Privacy Policy sets forth the basic principles by which the Company collects, retains, transfers, disposes and otherwise processes your personal data. Terms used throughout this Privacy Policy shall have the meaning ascribed to them in the GDPR.

In addition to the above, the Company adheres to the principles espoused in the Protection of Personal Information Act and the Constitution of South Africa in respect of:

1. The lawful processing of client data by the Company- acting as a responsible corporate citizen; and
2. The identification and allocation of accountability, where personal data is processed contrary to the prescripts of the Protection of Personal Information Act (the "Act")



Acceptance of Privacy Policy

By accessing and using our Services, you signify acceptance to the terms of this Privacy Policy. We reserve the right to revise this Privacy Policy at any time to reflect changes in law or our personal data collection and use practices. If changes are made to this Privacy Policy, we will notify you by email, by posting on the Interface, or by means of a notice on our Services and you will be required to accept any updated privacy policy before you are able to use the Services.

The Company has adopted steps to protect the security and confidentiality of the data gathered and collected by the Company. However, If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue the access or use of our Interface and Services.

If you have any questions or comments about this Privacy Policy or our privacy practices, please contact us via "Support Centre" support@unicorntechnologies.com.

If you decide to cancel or terminate your account, please send us an email at (website link). Please take note that the termination of your account does not conclude that the personal information you have provided and shared with the Company will be discarded. The Company may still store and keep your personal information for legal and regulatory purposes. Furthermore, when the account is terminated, the personal information will no longer be accessible in your account.

Consent

By using our website or to allow another person to use our Website on your behalf, you are permitting the Company to collect, gather, use, store, transfer, and disclose any personal data or other details or information obtained by the Company in compliance with this Privacy Policy pursuant to the use of this Website.

Purpose of the Privacy Policy

This Privacy Policy aims to give you information on how we collect and process your personal data through your use of the Interface and Services. Our Interface and Services are not intended for children, and we do not knowingly collect data relating to children.

It is of great importance that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This Privacy Policy supplements other notices and privacy policies, if any, and is not intended to override them.



Your Duty to Inform Us of Changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third Party Links

Our Interface and Services may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Interface or Services, we encourage you to read the privacy policy of every website you visit.

Failure to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is Your Personal Data Collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our Services;
- create an account on our Interface or Services;
- name
- email address
- subscribe to our Services or publications;
- request marketing material or content to be sent to you;
- enter a competition, promotion or survey;
- give us feedback or contact us;
- contact us with inquiries; or
- financial information

Automated technologies/interactions and third-party sources. We may automatically collect your personal information as you interact with our Interface (such as browsing actions, patterns, hardware model, device ID, operating system version, web-browser software and your Internet Protocol address/MAC address/device identifier). We may also receive your personal data from various third parties and public sources as required or permitted by applicable law (such as public databases, credit bureaus, ID



verification partners, resellers and channel partners, joint marketing partners, and social media platforms).

Indirect interactions. When you are using the website, the Company collects particular data that are considered to be non-personal such as, without limitation, domain names of the internet service providers you are using, websites that you visit, IP addresses, your approximate geographical collection. Take note that the data collected will be used only for statistical purposes.

Purposes for which We Use Your Personal Data

We will only use your personal data within the limits allowed by law and in accordance with this Privacy Policy. Most commonly, with reference to the types of legal basis specifically outlined in the GDPR, we will use your personal data where:

- we need to perform the contract we are about to enter into or have entered into with you;
- it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- we need to comply with a legal obligation.

Please see the below **Glossary** to find out more about the types of lawful basis that we will rely on to process your personal data.

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you with respect to the Interface or the provision of the Services. Based on your communication preferences, we may send you marketing communications to inform you about our events or our partner events; to deliver targeted marketing and advertising; and to provide you with promotional offers based on your communication preferences.

Information Shared with Third Parties

From time to time we may request your permission to allow us to share your personal data with third parties or third party service providers for the purposes of assisting us to operate our business, the website and the activities on behalf of the Company. We will only share your personal data with third parties who have a legitimate purpose for accessing it, particularly:

- We share your personal data with the companies within our group, business partners and to our employees or partners who is obliged to have your personal data for the purpose of providing you with the services of the Company;
- We share your personal data with third party identity verification services in order to perform obligations under AML Laws, Anti-Bribery Laws, Sanctions Laws, CTF Laws, and other Applicable Laws;



- We share your personal data with service providers who provide consultancy, banking, legal, insurance and accounting services under contract and who help with parts of our business operations;
- We share your personal data with financial institutions with which we partner to process payments you have authorised;
- We may share your personal data with companies or other entities that we plan to merge with or be acquired by. Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal data. You will receive prior notice of any change in applicable policies; and
- We share your personal data with law enforcement, officials, or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedure, or when we believe in good faith that the disclosure of personal data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our user agreement or any other applicable policies.

We require all third parties to respect the security of your personal data and to treat it in accordance with the Privacy Policy and applicable laws.

Opting Out

You may opt out of having your personal data shared with third parties, or allowing us to use your personal data for any purpose that is incompatible with the purposes for which we originally collected it or subsequently obtained your authorisation. If you choose to do so, certain features of our Interface or Services may not be available to you.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.



International Transfers

Your personal data may be transferred, stored, and processed in any country in which we operate.

Data Subjects of the European Economic Area ("EEA") Only:

Where we transfer your personal data outside of the EEA, this is done either on the basis that it is necessary for the performance of the contract between you and the Company, or that the transfer is subject to the European Commission's model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses), pursuant to Decision 2004/915/EC and Decision 2010/87/EU as appropriate or, in the event that the transfer is to a US entity, we may transfer personal data if the transferee is part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

- Contact Information such as your name, email address and telephone number for marketing purposes is retained on an ongoing basis until you unsubscribe.



- Content that you post on our Interface such as support desk comments, photographs, videos, blog posts, and other content may be kept indefinitely after you close your account for audit and crime prevention purposes.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, which include the right to:

- request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it;
- request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
- request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons (for example, for complying with the requirements of retaining certain personal data for a specific period of time under the Applicable Laws) which will be notified to you, if applicable, at the time of your request;
- object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data’s accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only



applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;

- withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain Services to you. We will advise you if this is the case at the time you withdraw your consent.

Information Officer

We shall appoint an Information Officer, the purpose of which is to ensure compliance with this Policy. The Information Officer shall be the Key Individual. The Key Individual may appoint Deputy Information Officers to assist with the performance of his/her duties.

Standard and Application

In adopting the process required to give effect to this Policy, we shall at all times adhere to the highest standards set by the South African regulatory authority and failing that, by the European Commission.

Changes or Updates to the Privacy Policy

The Company, in its discretion, may amend, revise or update this Privacy Policy from time to time and when necessary. The Company will publish the recent privacy policy in the website and the Company will post a notice of changes in the Privacy Policy in order to inform the users of such changes. Please take the time to thoroughly review this Privacy Policy from time to time.

Queries

If you have any questions or comments about this Privacy Policy or our privacy practices, please contact us via "Support Centre" at support@capecapitalgroup.co.za

Cape Capital Group:

Registered Office: First Floor Zotos House, 183 Smit Street, Fairland Johannesburg, Gauteng

Country of registration: South Africa

FSP No.: 50206

Registration Number: 2019/142922/07

Category License: Category 1



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