



## CALA CAPITAL AFRICA PRIVACY POLICY

### 1. OVERVIEW

All personal information processed in connection with this privacy policy (the “**Privacy Policy**”) is controlled by Cala Capital Africa (Pty) Ltd, a company registered in South Africa under company number 2018/103941/07 (from now on “**we**”, “**our**” or “**us**”). Our office is at 1102 One on Herwood, Umhlanga Ridge KZN South Africa. By “personal information” we mean all information that identifies or may identify you.

### 2. PURPOSE

We are committed to protecting and respecting your privacy. We collect, store and use personal information in accordance with all laws in any relevant jurisdiction that relate to data protection, privacy, the use of information relating to individuals, and/or the information rights of individuals including, without limitation, the Data Protection Act 1998 and the General Data Protection Regulation (EU 2016/679), and the PoPI ACT, for of 2013, and the equivalent in any other relevant jurisdictions all as amended or replaced from time to time. For the purposes of the DPA, we may act in the capacity of either a data processor or a data controller of any personal data we process about you.

This Privacy Policy applies to all personal information we gather or use in connection with your relationship with us as a customer or potential customer. This includes when you use our website, [www.calacapital.africa](http://www.calacapital.africa) (from now on referred to as our “Website”), any mobile apps which we make available (including our iPhone and Android apps) (from now on referred to as our “Mobile Apps”), services provided by us or others acting on our behalf, and when you interact with us. We will only use your personal information in accordance with this Privacy Policy.

This Privacy Policy should be read together with the terms and conditions posted elsewhere on our Website, including our website terms of use.

Please review this Privacy Policy carefully. By using our services, our Website or our Mobile Apps and by providing any personal information to us, you are agreeing or consenting to our use of your personal information as set out in this Privacy

Policy. Please do not provide us with any personal information if you do not want that information to be used by us in this manner.

We may amend this Privacy Policy from time to time. Using our services, our Website or our Mobile Apps and providing any personal information to us after the effective date of the amendments constitutes acceptance of our amended Privacy Policy. We reserve the right, in any event, to apply the amended Privacy Policy to the information we have already collected. You should read and review this page regularly to see if there have been any changes.

### **3. HOW WE COLLECT AND RECEIVE PERSONAL INFORMATION**

We may collect and/or receive personal information from you when you:

- **fill in forms on our Website or Mobile Apps, including when you register, create or modify an online or in app account with us;**
- **communicate with us, such as by mail, telephone, in writing or through our website or social media;**
- **use or access our Website or Mobile Apps; or**
- **respond to surveys or questionnaires we ask you to complete.**

We may also collect your personal information from publicly available information such as information on third party websites or from our business partners.

### **4. TYPES OF PERSONAL INFORMATION**

The types of personal information we receive, store and use may include:

- **your title, name, gender, address, telephone numbers, email address and date of birth;**
- **details of the organization you work for;**
- **your account information (including your username and password);**
- **information about your clients;**
- **your bank account details, credit or debit card number, or transactions;**
- **information about your investment opportunities;**
- **information about your interactions you may have with us and our staff, including interactions via email, telephone or through our Website or Mobile Apps; and**
- **information regarding your personal or professional interests, demographics, experiences with our products, and contact preferences in order to provide you with further services or information about our products and services.**

- We automatically collect the following information when you visit our website:
- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

We use this automatically collected information to maintain and improve our services and our site.

## **5. USE OF PERSONAL INFORMATION**

We use the personal information we collect and receive to help us understand your needs and to help us provide you with a better service. In particular, we collect, store and process your personal information for the following reasons:

- to provide our products and services to you;
- for purposes related to providing our products and services to you;
- to provide special offers and other related services to you;
- to improve and tailor our products and services;
- for our own internal record-keeping requirements;
- to protect your account and prevent unauthorised access to your account;
- for marketing purposes, such as sending you email newsletters with our latest offers, information, promotions or products and services or other information we think you may find interesting or for customer satisfaction purposes in accordance with this Privacy Policy (see below);
- for market research, analysis, testing, monitoring, risk management and administrative purposes; and
- to contact you, for example, to send service communications through our Mobile Apps, Website, email or any other medium such as to notify you to check your dashboard when financial transfers have been made on your behalf.

## **6. SHARING PERSONAL INFORMATION**

We may disclose personal information we collect or receive:

- to you or those acting on your behalf;
- to companies within our group, partners and joint ventures and other companies under common control (collectively, “Affiliates”) for the purposes described in this Privacy Policy and always in accordance with the terms of this Privacy Policy;
- to third parties to provide a service to, or perform a function for, us or you or who are otherwise appointed by us in connection with the services we offer you including those who are acting as our agent or sub-contractor, including, without limitation, data processing service providers and our legal and professional advisors;
- to third parties in connection with a proposed or actual financing, securitisation, insuring, merger, restructure, sale, acquisition, assignment or other disposal of all or part of our business or assets or the assets of any Affiliate or to anyone whom we may transfer our rights and/or obligations for the purposes of evaluating and performing the proposed transaction; and
- to third parties, including law enforcement officials, law courts and government and regulatory authorities: (a) if we believe disclosure is required by any applicable law, regulation or legal process (such as to respond to subpoenas or judicial orders); or (b) to protect and defend our rights, or the rights or safety of third parties, including to defend against legal claims.

## **7. STATISTICAL INFORMATION**

We may aggregate information about you with information about other users of our Website or Mobile Apps to create statistical data about users. This is statistical data that does not identify you and we may distribute any such aggregate information to third parties we work with.

## **8. MARKETING COMMUNICATIONS**

We will only send you marketing communications by electronic means (e-mail, via our apps or text) if those communications relate to goods, services or opportunities which are similar to those that you have previously used, purchased or expressed an interest in or if you have consented to us contacting you in this way. We will only permit third parties to send you marketing communications by electronic means if you have consented to this.

During your account set-up process you will be able to opt out of receiving marketing communications from us and/or third parties. You can change your marketing preferences at any time by contacting us at [data@calacapital.africa](mailto:data@calacapital.africa).

## 9. DATA STORAGE

Personal information we collect from you may be transferred to and stored in destinations outside the European Economic Area and may be processed by staff operating outside the European Economic Area. Countries outside the European Economic Area may not offer the same levels of data protection as the UK. By submitting your personal information you agree to this transfer, storage and processing.

We will take all steps reasonably necessary to keep your data secure. You should be aware that transmission of information via the internet is not entirely secure and we cannot guarantee the security of any data you transmit to our Website or Mobile Apps via the internet.

We will retain your personal information and other information which we have collected or received to the extent required by applicable laws and as we may require for operational and legal purposes.

## 10. COOKIES

Cookies are small files placed on your device when you visit our Website. We use cookies to recognise you and your preferences, improve the performance of our Website and to create statistical data.

Cookies generally fall into one of the following categories:

- **strictly necessary cookies which are cookies that are essential to allow you to use a website and its features;**
- **performance cookies which collect information about how visitors use a website to create aggregated, anonymous information that does not identify the visitor;**
- **functionality cookies which allow the website to remember you and provide a more personalised service; and**
- **targeting or advertising cookies which are used to deliver adverts relevant to you.**

Our Website uses all of the above types of cookies.

Some of our cookies remain on your device between your browsing sessions.

You can disable our cookies by changing the settings on your browser but doing so might mean you are unable to use certain features of our Website.

## **11. THIRD PARTY LINKS**

Our Website and Mobile Apps may contain links to enable you to visit third-party websites, mobile sites and mobile applications. Please note that we do not have any control over these third-party websites, mobile sites or mobile applications. Therefore, we are not responsible for the protection and privacy of any information that you provide whilst visiting such sites. Such sites are governed by their own privacy policies and not this Privacy Policy.

## **12. ACCESS TO INFORMATION**

You have a right under data protection and privacy legislation to access information we hold about you by contacting us at [data@calacapital.africa](mailto:data@calacapital.africa).

## **13. CONTACT US**

If you have any questions or comments on this policy or you would like to request a copy of your personal information, you can contact our Data Protection Officer at: [data@calacapital.africa](mailto:data@calacapital.africa).

Effective: 1 October 2021