

NEU CAPITAL.AFRICA PRIVACY POLICY

1. OVERVIEW

All personal information processed in connection with this privacy policy (the “**Privacy Policy**”) is controlled by Neu 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 Herrwood, 1 Herrwood Drive, Umhlanga Ridge 4319, 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, Protection of Personal Information Act (2013, South Africa), the Data Protection Act 1998 (UK) and any other laws in force from time to time which implement the Data Protection Directive 1995/46/EC and the General Data Protection Regulation (EU 2016/679), 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.neucapital.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);**
- **if you become a client, information about your capital seeking clients;**
- **your bank account details, credit or debit card number, or transactions;**
- **information about your investment opportunities, or your investment mandate and preferences;**
- **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@neucapital.africa.

9. DATA STORAGE

Personal information we collect from you may be transferred to and stored in destinations outside the UK or European Economic Area and may be processed by staff operating outside the UK or European Economic Area. Countries outside the UK or European Economic Area may not offer the same levels of data protection as the UK or European Economic Area. 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; and**
- **functionality cookies which allow the website to remember you and provide a more personalised service; and**

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@neucapital.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@neucapital.africa.

Effective: 20 January 2022

<https://www.gov.uk/help/terms-conditions>

Terms and conditions

This page and any pages it links to explains GOV.UK's terms of use. You must agree to these to use GOV.UK.

Who we are

GOV.UK is managed by [Government Digital Service](#) (GDS) on behalf of the Crown. GDS is part of the Cabinet Office and will be referred to as 'we' from now on.

Using GOV.UK

You agree to use GOV.UK only for lawful purposes. You must also use it in a way that does not infringe the rights of, or restrict or inhibit the use and enjoyment of, this site by anyone else.

We update GOV.UK all the time. We can change or remove content at any time without notice.

Services and transactions

You can use GOV.UK to access online government services and transactions, for example [GOV.UK Verify](#) or [register to vote](#).

These can be managed by GDS or another government department or agency.

Some services have their own terms and conditions which also apply - read these before you use the service.

Linking to GOV.UK

We welcome and encourage other websites to link to GOV.UK.

You must [contact us](#) for permission if you want to either:

- charge your website's users to click on a link to any page on GOV.UK
- say your website is associated with or endorsed by GOV.UK or another government department or agency

Linking from GOV.UK

GOV.UK links to websites that are managed by other government departments and agencies, service providers or other organisations. We do not have any control over the content on these websites.

We're not responsible for:

- the protection of any information you give to these websites
- any loss or damage that may come from your use of these websites, or any other websites they link to

You agree to release us from any claims or disputes that may come from using these websites.

You should read all terms and conditions, privacy policies and end user licences that relate to these websites before you use them.

Using GOV.UK content

Most content on GOV.UK is subject to [Crown copyright protection](#) and is published under the [Open Government Licence](#) (OGL).

Some content is exempt from the OGL - check the [list of exemptions](#).

Departmental logos and crests are also exempt from the OGL, except when they form an integral part of a document or dataset.

If any content is not subject to Crown copyright protection or published under the OGL, we'll usually credit the author or copyright holder.

You can reproduce content published on GOV.UK under the OGL as long as you follow the licence's conditions.

[Contact us](#) if you want to reproduce a piece of content but are not sure if it's covered by Crown copyright or the OGL.

We make most of the content on GOV.UK available through feeds for other websites and applications to use. The websites and applications that use our feeds are not our products, and they might use versions of our content that have been edited and stored for later use ('cached').

We do not give any guarantees, conditions or warranties about the accuracy or completeness of any content used by these products. We're not liable for any loss or damage that may come from your use of these products.

The most up to date version of our content will always be on GOV.UK.

Disclaimer

While we make every effort to keep GOV.UK up to date, we do not provide any guarantees, conditions or warranties that the information will be:

- current
- secure
- accurate
- complete
- free from bugs or viruses

We do not publish advice on GOV.UK. You should get professional or specialist advice before doing anything on the basis of the content.

We're not liable for any loss or damage that may come from using GOV.UK. This includes:

- any direct, indirect or consequential losses
- any loss or damage caused by civil wrongs ('tort', including negligence), breach of contract or otherwise
- the use of GOV.UK and any websites that are linked to or from it
- the inability to use GOV.UK and any websites that are linked to or from it

This applies if the loss or damage was foreseeable, arose in the normal course of things or you advised us that it might happen.

This includes (but is not limited to) the loss of your:

- income or revenue
- salary, benefits or other payments
- business
- profits or contracts
- opportunity
- anticipated savings
- data
- goodwill or reputation
- tangible property
- intangible property, including loss, corruption or damage to data or any computer system
- wasted management or office time

We may still be liable for:

- death or personal injury arising from our negligence
- fraudulent misrepresentation
- any other liability which cannot be excluded or limited under applicable law

Requests to remove content

You can ask for content to be removed from GOV.UK. We'll remove content:

- in order to comply with data protection legislation covering the rights and freedoms of individuals
- if it breaches copyright laws, contains sensitive personal data or material that may be considered obscene or defamatory

[Contact us](#) to ask for content to be removed. You'll need to send us the web address (URL) of the content and explain why you think it should be removed. We'll reply to let you know whether we'll remove it.

We remove content at our discretion in discussion with the department or agency responsible for it. You can still request information under the [Freedom of Information Act](#) and the [Data Protection Act](#).

Information about you and your visits to GOV.UK

We collect information about you in accordance with our [privacy policy](#) and our [cookie policy](#). By using GOV.UK, you agree to us collecting this information and confirm that any data you provide is accurate.

Virus protection

We make every effort to check and test GOV.UK for viruses at every stage of production. You must make sure that the way you use GOV.UK does not expose you to the risk of viruses, malicious computer code or other forms of interference which can damage your computer system.

We're not responsible for any loss, disruption or damage to your data or computer system that might happen when you use GOV.UK.

Viruses, hacking and other offences

When using GOV.UK, you must not introduce viruses, trojans, worms, logic bombs or any other material that's malicious or technologically harmful.

You must not try to gain unauthorised access to GOV.UK, the server on which it's stored or any server, computer or database connected to it.

You must not attack GOV.UK in any way. This includes denial-of-service attacks.

We'll report any attacks or attempts to gain unauthorised access to GOV.UK to the relevant law enforcement authorities and share information about you with them.

Governing law

These terms and conditions are governed by and construed in accordance with the laws of England and Wales.

Any dispute you have which relates to these terms and conditions, or your use of GOV.UK (whether it be contractual or non-contractual), will be subject to the exclusive jurisdiction of the courts of England and Wales.

General

There may be legal notices elsewhere on GOV.UK that relate to how you use the site.

We're not liable if we fail to comply with these terms and conditions because of circumstances beyond our reasonable control.

We might decide not to exercise or enforce any right available to us under these terms and conditions. We can always decide to exercise or enforce that right at a later date.

Doing this once will not mean we automatically waive the right on any other occasion.

If any of these terms and conditions are held to be invalid, unenforceable or illegal for any reason, the remaining terms and conditions will still apply.

Changes to these terms and conditions

Please check these terms and conditions regularly. We can update them at any time without notice.

You'll agree to any changes if you continue to use GOV.UK after the terms and conditions have been updated.

Last updated 6 October 2015

<https://www.gov.uk/help/privacy-notice>

Privacy notice

GOV.UK (or www.gov.uk) is provided by the [Government Digital Service](#) (GDS), part of the Cabinet Office.

Cabinet Office is the data controller for pages starting with www.gov.uk - for example, www.gov.uk/pip.

If you follow a link to a service provided by another government department, agency or local authority, that organisation will:

- be the data controller
- be responsible for processing any data you share with them
- publish and manage their own privacy notice with details of how to contact them

Example

If you make a claim for Universal Credit www.universal-credit.service.gov.uk, the Department for Work and Pensions will be the responsible controller. The service's own [privacy notice](#) will apply. A data controller determines how and why personal data is processed. For more information, read the Cabinet Office's entry in the [Data Protection Public Register](#).

What data we collect

The personal data we collect from you includes:

- questions, queries or feedback you leave, including your email address if you contact GOV.UK
- your postcode if you use a GOV.UK service that includes a postcode lookup function (such as the [school term and holiday dates service](#))
- your email address and subscription preferences when you sign up to our email alerts
- how you use our emails - for example whether you open them and which links you click on
- your Internet Protocol (IP) address, and details of which version of [web browser](#) you used
- information on how you use the site, using [cookies](#) and page tagging techniques

We use [Google Analytics](#) and [LUX Real User Monitoring \(RUM\)](#) software to collect information about how you use GOV.UK and how the website performs during your visit. This includes IP addresses. The data is anonymised before being used for analytics and web performance processing.

Google Analytics processes anonymised information about:

- the pages you visit on GOV.UK
- how long you spend on each GOV.UK page
- how you got to the site
- what you click on while you're visiting the site

LUX Real User Monitoring software processes anonymised information about:

- how well the pages performed on your device
- performance bottlenecks your device experienced
- JavaScript errors your device encountered

We do not store your personal information through Google Analytics or LUX (for example your name or address).

We will not identify you through analytics information, and we will not combine analytics information with other data sets in a way that would identify who you are.

We continuously test and monitor our data protection controls to make sure they're effective and to detect any weaknesses.

Why we need your data

We collect information through Google Analytics to see how you use GOV.UK and government digital services and through LUX to see how well the site performs on your device. We do this to help:

- make sure GOV.UK is meeting the needs of its users
- make improvements, for example [improving site search](#)
- make performance improvements, for example improving page load time and data usage

We also collect data in order to:

- gather feedback to improve our services, for example our email alerts
- respond to any feedback you send us, if you've asked us to
- send email alerts to users who request them
- allow you to access government services and make transactions
- provide you with information about local services
- monitor use of the site to identify security threats
- monitor the performance of the site to identify inefficiencies and JavaScript errors

Our legal basis for processing your data

The legal basis for processing personal data in relation to site security is our legitimate interests, and the legitimate interests of our users, in ensuring the security and integrity of GOV.UK.

The legal basis for processing anonymised data for Google Analytics and LUX is your consent.

The legal basis for processing all other personal data is that it's necessary:

- to perform a task in the public interest
- in the exercise of our functions as a government department

What we do with your data

The data we collect may be shared with other government departments, agencies and public bodies. It may also be shared with our technology suppliers, for example our hosting provider.

We will not:

- sell or rent your data to third parties
- share your data with third parties for marketing purposes
- use your data in analytics

We will share your data if we are required to do so by law - for example, by court order, or to prevent fraud or other crime.

How long we keep your data

We will only retain your personal data for as long as:

- it is needed for the purposes set out in this document
- the law requires us to

We will keep your email data until you unsubscribe. We will keep your feedback data for 2 years. We will delete access log data after 120 days.

Children's privacy protection

Our services are not designed for, or intentionally targeted at, children 13 years of age or younger. We do not intentionally collect or maintain data about anyone under the age of 13.

Where your data is processed and stored

We design, build and run our systems to make sure that your data is as safe as possible at all stages, both while it's processed and when it's stored.

All personal data is stored in the [European Economic Area](#) (EEA). Data collected by Google Analytics and LUX may be transferred outside the EEA for processing.

How we protect your data and keep it secure

We are committed to doing all that we can to keep your data secure. We have set up systems and processes to prevent unauthorised access or disclosure of your data - for example, we protect your data using varying levels of encryption.

We also make sure that any third parties that we deal with keep all personal data they process on our behalf secure.

Your rights

You have the right to request:

- information about how your personal data is processed
- a copy of that personal data
- that anything inaccurate in your personal data is corrected immediately

You can also:

- raise an objection about how your personal data is processed
- request that your personal data is erased if there is no longer a justification for it
- ask that the processing of your personal data is restricted in certain circumstances

If you have any of these requests, get in contact with our Privacy Team.

Links to other websites

GOV.UK contains links to other websites.

This privacy notice only applies to GOV.UK, and does not cover other government services and transactions that we link to. These services, such as [Universal Credit](#), have their own terms and conditions and privacy policies.

Following a link to another website

If you go to another website from this one, read the privacy policy on that website to find out what it does with your information.

Following a link to GOV.UK from another website

If you come to GOV.UK from another website, we may receive personal information from the other website. You should read the privacy policy of the website you came from to find out more about this.

GOV.UK accounts trial

GOV.UK is trialling accounts to try to improve online public services.

Creating an account is optional and all GOV.UK services are accessible with or without an account. You can access, update or permanently delete your account and all the information stored in it at any time.

This privacy notice covers most things related to GOV.UK accounts but accounts need to collect and store some extra data to make them work. Read the [full GOV.UK accounts trial privacy notice](#) for more detail on how GOV.UK accounts store, process and share your personal information.

Contact us or make a complaint

Contact the Privacy Team if you:

- have a question about anything in this privacy notice
- think that your personal data has been misused or mishandled

Privacy Team

gds-privacy-office@digital.cabinet-office.gov.uk

You can also contact our Data Protection Officer (DPO):

Data Protection Officer

DPO@cabinetoffice.gov.uk

Cabinet Office

70 Whitehall

London

SW1A 2AS

The DPO provides independent advice and monitoring of our use of personal information.

You can also make a complaint to the Information Commissioner, who is an independent regulator.

Information Commissioner

casework@ico.org.uk

Telephone: 0303 123 1113

Textphone: 01625 545860

Monday to Friday, 9am to 4:30pm

[Find out about call charges](#)

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Changes to this policy

We may change this privacy policy. In that case, the 'last updated' date at the bottom of this page will also change. Any changes to this privacy policy will apply to you and your data immediately.

If these changes affect how your personal data is processed, GDS will take reasonable steps to let you know.

Last updated 16 June 2021

<https://www.gov.uk/help/cookies>

Cookies on GOV.UK

Cookies are files saved on your phone, tablet or computer when you visit a website.

We use cookies to store information about how you use the GOV.UK website, such as the pages you visit.

Cookie settings

We use 4 types of cookie. You can choose which cookies you're happy for us to use.

Cookies that measure website use

We use Google Analytics and LUX Real User Monitoring software from SpeedCurve to measure how you use the website and your web performance experience while visiting so we can improve it based on user needs. We do not allow Google or SpeedCurve to use or share the data about how you use this site.

Google Analytics sets cookies that store anonymised information about:

- how you got to the site
- the pages you visit on GOV.UK and government digital services, and how long you spend on each page
- what you click on while you're visiting the site

LUX software stores anonymised information about how well pages performed on your device (including JavaScript errors):

- Use cookies that measure my website use
- Do not use cookies that measure my website use

Cookies that help with our communications and marketing

These cookies may be set by third party websites and do things like measure how you view YouTube videos that are on GOV.UK.

- Use cookies that help with communications and marketing
- Do not use cookies that help with communications and marketing

Cookies that remember your settings

These cookies do things like remember your preferences and the choices you make, to personalise your experience of using the site.

- Use cookies that remember my settings on the site
- Do not use cookies that remember my settings on the site

Strictly necessary cookies

These essential cookies do things like remember your progress through a form (for example a licence application)

They always need to be on.

[Find out more about cookies on GOV.UK](#)

Save changes