

## EXTERNAL PRIVACY NOTICE

### 1. INTRODUCTION

- 1.1 Dipula Income Fund Limited, a public company registered in the Republic of South Africa, and its subsidiaries (“**Dipula**”, “**we**” or “**us**”) recognises the importance of privacy and the protection of personal information provided to it and is committed to safeguarding such information. Dipula will take all reasonable measures to comply with the Protection of Personal Information Act, 2013 (“**POPI**”), a data protection law applicable in South Africa.
- 1.2 This privacy notice (the “**Privacy Notice**”) explains how Dipula collects and uses your personal information, with whom it may be shared and what safeguards are in place to protect it. It also contains information regarding the rights of natural persons (and juristic persons, where applicable) to whom the personal information relates (“**data subject**” or “**you**”).
- 1.3 Dipula’s website may contain links to other websites. This Privacy Notice does not apply to the use of third party websites. Dipula is not responsible for the privacy practices of third parties, which are subject to their respective privacy notices.
- 1.4 Dipula reserves the right to amend this Privacy Notice or add provisions to it at any time by publishing an updated version on their website.

### 2. INFORMATION COLLECTED

- 2.1 Dipula collects personal information in various instances, including when:
  - 2.1.1 you contact Dipula or request information or services;
  - 2.1.2 Dipula provides services to you;
  - 2.1.3 you are a service provider of Dipula;
  - 2.1.4 you use Dipula’s website or engage with Dipula through social media;  
or
  - 2.1.5 you apply for employment at Dipula.
- 2.2 Dipula may collect personal information directly from you or from third parties (such as regulators, government authorities and registries, Dipula’s agents, contractors and suppliers). Some information may also be generated internally by Dipula, such as a transaction record or phone conversations.
- 2.3 You are free not to communicate personal information to Dipula, however this might affect the availability of the services offered by Dipula. Where the personal information requested is mandatory, Dipula will not be able to provide services to you if such information is not provided. In other instances, providing the information may be optional, such as choosing to subscribe to a newsletter. If you do not provide the information when it is

optional, you will not receive the benefit of providing the information (e.g., the newsletter).

- 2.4 Your interaction with the Dipula on the website will result in the collection of information regarding your activities on the website. Similarly, we may collect information when you engage with us via any one of our social media platforms.
- 2.5 In the course of engaging with and providing services to you, Dipula will be exposed to and collect your personal information which includes, but is not limited to, your name, contact details, financial information, information regarding the subject matter with which you need assistance and other such other information as may be required for us to render services to you or by your engagement with us.
- 2.6 As part of our recruitment processes, Dipula collects information from employment applicants. This information includes educational information as well as employment history. By enquiring about employment opportunities at Dipula or applying for employment, we infer that we are acting in your and our best interests when we process your personal information for recruitment purposes, which may include screening as well as background and reference checks by third parties.
- 2.7 Dipula may be obliged to collect your personal information in terms of various laws. This legislation can be found in our PAIA Manual.
- 2.8 Dipula does not engage in any automated decision-making.
- 2.9 You are responsible for any third-party personal information shared with Dipula and confirm that you have the third party's consent to provide the personal information to Dipula.

### **3. PURPOSE FOR WHICH PERSONAL INFORMATION IS USED**

Depending on our relationship with you, the purpose for which Dipula processes your personal information may include, but is not limited to:

- 3.1 providing services to you;
- 3.2 manage our customer relationship with you and to provide customer support services to you;
- 3.3 improving the services offered by Dipula as well as your experience when using the website;
- 3.4 perform in terms of an agreement with you and/or for any pre-contractual obligations thereof;
- 3.5 operate our business and comply with our contractual obligations with third parties;
- 3.6 marketing and to promote and advertise products and services to you;
- 3.7 communicating with you for Dipula's internal purposes;

- 3.8 enabling Dipula's internal operations;
- 3.9 comply with legal or regulatory obligations;
- 3.10 act in our or your legitimate interests;
- 3.11 instances where you have provided your explicit consent;
- 3.12 exercise and defend legal rights; and
- 3.13 conduct research.

#### **4. RETENTION**

- 4.1 Dipula will process the personal information collected from you at their operating offices and in any other place where the parties involved in processing are located.
- 4.2 Your personal information will be processed and stored for as long as required by the purpose it has been collected for pursuant to the provisions of this Privacy Notice and as long as required by applicable law.
- 4.3 Personal information collected for purposes related to the performance of a contract between us and you will be retained until such contract has been performed. Personal information collected for the purpose of our legitimate interests will be retained as long as needed to fulfil such purposes.
- 4.4 Dipula may retain personal information for a longer period in instances where you have given consent to such processing, and where such consent has not been withdrawn. Dipula may also be required to retain your personal information for a longer period when required to do so in the performance of a legal obligation, in accordance with tax or accounting requirements or upon the order of a court order.
- 4.5 Once the retention period expires, your personal information will be deleted.

#### **5. DISCLOSURE OF PERSONAL INFORMATION**

- 5.1 Dipula may share your personal information within the Dipula group, where such disclosure is necessary to provide you with services or to manage its business operations. Your personal information is accessed by our employees with a relevant need to do so, which includes, without limitation, our sales department, customer service department, legal department, human resources department and marketing department.
- 5.2 Dipula may release your personal information or disclose it to third parties in certain circumstances, including, but not limited to the following:
  - 5.2.1 if Dipula is required or authorised to do so by law or a court order;
  - 5.2.2 in order for Dipula to enforce its rights;
  - 5.2.3 in order to manage Dipula's business operations; and
  - 5.2.4 in order for Dipula to provide services to you.

- 5.3 Depending on our relationship with you, Dipula may disclose your personal information to the following third parties:
- 5.3.1 third party service providers of Dipula;
  - 5.3.2 third parties who provide research services to Dipula; and
  - 5.3.3 government authorities and registries, organs of state, regulators, courts, tribunals and law enforcement agencies.
- 5.4 Our third party service providers have agreed to confidentiality restrictions and use any personal information shared with them or which they collect on Dipula's behalf solely for the purpose of providing the contracted service to us.
- 5.5 Dipula may share non-personal information in aggregate statistical form regarding the visitors to the website, traffic patterns and website usage with their partners, affiliates and advertisers.
- 5.6 If Dipula should sell or transfer some or all of its business or assets to a third party in future, they may disclose information to a potential or actual third party purchaser of their business or assets.

## **6. SECURITY**

- 6.1 Dipula uses systems that are sufficiently secure with reference to accepted technological standards from time to time.
- 6.2 Dipula will secure the integrity and confidentiality of your personal information in its possession and under its control by taking appropriate, reasonable technical and organisational security measures to prevent: (i) loss of, damage to or unauthorised destruction of personal information; and (ii) unlawful access to or processing of personal information.
- 6.3 Dipula routinely reviews their operations in order to ensure that personal information is adequately protected.

## **7. MARKETING AND PROMOTIONAL MATERIAL**

- 7.1 Dipula may from time to time send marketing and promotional material to you.
- 7.2 Recipients may opt out from receiving such communications by contacting Dipula at the details provided in clause 11 below or by clicking on the opt-out link that will be contained in the relevant electronic communication.

## **8. TRANSFER OF PERSONAL INFORMATION**

- 8.1 Personal information collected by Dipula may be transferred to natural or legal persons in other countries.
- 8.2 If we do so, we will transfer the personal information only for the purposes described in this Privacy Notice. Only the personal information that is necessary to fulfil such purpose will be transferred.

- 8.3 Dipula will take reasonable steps ensure that such third parties have appropriate privacy measures in place and that transfers of personal information are in accordance with applicable law and carefully managed to protect your privacy rights and interests.

## 9. COOKIES

- 9.1 Dipula's website makes use of cookies to collect data. Cookies store information regarding the website's visitors and their use of the website. Cookies have various purposes, such as improving the user's experience on the website and to facilitate the user's use of the website.
- 9.2 You may disable or decline cookies. However, if you choose to do so, you might not be able to use the website properly and certain aspects of the website might not function.

## 10. DATA PROTECTION RIGHTS

- 10.1 You may exercise certain rights regarding your personal information processed by Dipula. In particular, subject to applicable law, you have the right to do the following:
- 10.1.1 the right to access personal information by requesting a copy of your personal information (which service may be subject to a small fee);
  - 10.1.2 the right to rectify personal information by requesting that any inaccurate information is corrected or that any incomplete information is supplemented;
  - 10.1.3 the right to erase personal information;
  - 10.1.4 the right to restrict the processing of personal information;
  - 10.1.5 the right to object to the processing of personal information;
  - 10.1.6 the right to object how we use your personal information for direct marketing purposes; and
  - 10.1.7 the right to lodge a complaint with a competent supervisory authority.
- 10.2 In some instances, you may withdraw your consent for processing. This withdrawal will have no effect on any lawful processing of your personal information preceding such withdrawal.
- 10.3 If you wish to exercise your rights, you can contact Dipula on the details provided in clause 11 below. Dipula may charge you a fee for accessing, amending or deleting your personal information. You will be advised of this fee in advance, if applicable.
- 10.4 In South Africa, the competent supervisory authority is the Information Regulator, which may be contacted using the contact details provided at: <https://justice.gov.za/inforg/contact.html>.

## 11. CONTACT DETAILS

You may contact Dipula for purposes relating to this Privacy Notice using the following contact details:

### **Information Protection Officer**

Dipula Income Fund Limited

Izak Petersen/ Ridwaan Asmal

Telephone: 011 325 2112

E-mail: [izak@dipula.co.za](mailto:izak@dipula.co.za); [ridwaan@dipula.co.za](mailto:ridwaan@dipula.co.za)

**Revised: 1 February 2021**