



Privacy Policy (POPIA)

Paladin Investment Management (Pty) Ltd

FSP Number 54625

Last updated: 1 July 2026

Paladin Investment Management (Pty) Ltd (“Paladin”, “we”, “us”, “our”), part of the Paladin Africa group of companies, respects your privacy and is committed to protecting the Personal Information we hold. This Privacy Policy explains how we process Personal Information in accordance with the Protection of Personal Information Act, 2013 (“POPIA”).

1. Introduction and Scope

- 1.1 This Privacy Policy explains how Paladin Investment Management (Pty) Ltd (“Paladin”, “we”, “us”, “our”), part of the Paladin Africa group of companies, collects, uses, shares and protects Personal Information when you visit our website (<https://paladin.africa>, the “Site”) or otherwise engage with us.
- 1.2 The right to privacy is enshrined in the Constitution of the Republic of South Africa. We process Personal Information in accordance with POPIA, and this Policy gives effect to that right by regulating the way we process Personal Information. As the Responsible Party, Paladin is committed to the principles of accountability, transparency, and lawful, consensual and responsible processing.
- 1.3 Paladin is an authorised financial services provider whose business includes investment management and related financial services. We may therefore need to collect Personal Information to comply with applicable law and to render efficient and effective services. This Policy should be read together with our Website Terms & Conditions and Website Disclaimer.
- 1.4 By using the Site or providing us with Personal Information, you acknowledge that you have read and understood this Policy. If you do not agree with it, please do not use the Site or submit information to us.

2. Definitions

- 2.1 “Personal Information”: information relating to an identifiable, living natural person, and where applicable an identifiable, existing juristic person, as defined in POPIA — including names, contact details, identity or registration numbers, and email addresses.
- 2.2 “Processing”: any operation or activity concerning Personal Information, whether automated or not, including its collection, receipt, recording, organisation, collation, storage, updating, modification, retrieval, alteration, consultation, use, dissemination by transmission or distribution, merging, linking, restriction, degradation, erasure or destruction.
- 2.3 “Responsible Party”: the party that determines the purpose of and means for processing Personal Information. Paladin is the Responsible Party for the processing described in this Policy.
- 2.4 “Operator”: a third party that processes Personal Information on behalf of the Responsible Party, under a written agreement and without acquiring rights over that information.
- 2.5 “Data Subject”: the person to whom Personal Information relates.

3. Who We Are and Our Information Officer

- 3.1 Paladin Investment Management (Pty) Ltd is the Responsible Party for Personal Information processed under this Policy. Our registration and contact details appear in the Contact Information section below.
- 3.2 Our Information Officer is Gerhard Visagie, Founder and Chief Executive Officer. The Information Officer is responsible for ensuring our compliance with POPIA and for dealing with requests and complaints relating to Personal Information. You can reach the Information Officer at info@paladin.africa.

4. Personal Information We Collect

- 4.1 Identity and contact details: your name, email address, telephone number, and the organisation you represent.
- 4.2 Correspondence: the content of enquiries, messages and other communications you send to us.
- 4.3 Technical and usage data: information collected automatically when you visit the Site, such as your IP address, browser type, device information, pages viewed and the dates and times of access.
- 4.4 We do not actively seek to collect special personal information or the personal information of children through the Site.

5. How We Collect Personal Information

- 5.1 Directly from you: when you contact us, subscribe to communications, or otherwise interact with us through the Site.
- 5.2 Automatically: through cookies and similar technologies when you use the Site (see the Cookies and Website Analytics section below).
- 5.3 From third parties: where lawful and relevant, from sources such as our group companies, professional advisers, referral networks, and publicly available sources.
- 5.4 We are committed to ensuring that the Personal Information we hold is accurate, complete and up to date, and we take reasonable steps to verify it where appropriate. If you discover that information we hold about you is incorrect, you may contact us to have it corrected.

6. Purposes of Processing

- 6.1 To respond to your enquiries and to communicate with you.
- 6.2 To operate, provide, maintain and improve the Site and our services.
- 6.3 To send you communications you have requested, where you have consented or where we are otherwise permitted to do so.
- 6.4 To comply with our legal, regulatory and contractual obligations, including those under POPIA and the Financial Advisory and Intermediary Services Act, 2002 (“FAIS”).

- 6.5 To protect our rights, property and operations, and to detect, prevent and address fraud, security and technical issues.

7. Lawful Basis for Processing

- 7.1 We process Personal Information only where we have a lawful basis to do so, namely: your consent; the performance of a contract or steps taken at your request before entering into a contract; compliance with a legal obligation; the protection of a legitimate interest of yours; or the pursuit of our legitimate interests or those of a third party, balanced against your rights.
- 7.2 Where processing relies on consent, you may withdraw that consent at any time, without affecting the lawfulness of processing carried out before withdrawal.

8. Disclosure and Sharing of Personal Information

- 8.1 We do not sell your Personal Information. We may share it in the following circumstances:
- 8.1.1 With Operators who provide services to us, such as hosting, email and analytics providers, under written agreements that require them to protect Personal Information and to process it only on our instructions.
 - 8.1.2 With other companies in the Paladin Africa group, where necessary for the purposes described in this Policy.
 - 8.1.3 With professional advisers, such as legal, audit and compliance advisers, where reasonably required.
 - 8.1.4 With regulators, law enforcement and other authorities, where required or permitted by law.
- 8.2 Our employees are obliged to respect the confidentiality of Personal Information and are bound by confidentiality obligations in their employment contracts. Operators are likewise bound by written agreements to respect the confidentiality of Personal Information and to maintain appropriate safeguards.
- 8.3 We will not disclose Personal Information to a third party unless: we are compelled to comply with a legal or regulatory requirement, or disclosure is otherwise permitted by law; it is in the public interest to prevent financial loss; or it is necessary to protect our rights.

9. Cross-Border Transfers

- 9.1 Paladin operates in South Africa and Rwanda, and some of our service providers may process Personal Information outside South Africa. Where we transfer Personal Information across borders, we do so only in accordance with POPIA — for example, where the recipient is subject to laws or binding agreements that provide an adequate level of protection, or where you have consented, or where the transfer is necessary for the performance or conclusion of a contract.

10. Security Safeguards

- 10.1 We implement reasonable technical and organisational measures to protect Personal Information against loss, damage, unauthorised access and unlawful processing. These measures are reviewed and updated as appropriate.
- 10.2 No method of transmission over the internet or electronic storage is completely secure. While we take appropriate steps to protect Personal Information, we cannot guarantee its absolute security.
- 10.3 If a security compromise affecting your Personal Information occurs, we will notify you and the Information Regulator as soon as reasonably possible, as required by POPIA. Notification to you will be made by email to your last known email address, by post to your last known address, by a notice on the Site, or as otherwise directed by the Information Regulator.

11. Training

- 11.1 As part of our commitment to organisation-wide compliance with POPIA and this Policy, we provide regular training to our staff on the protection of Personal Information.

12. Retention and Data Minimisation

- 12.1 We collect only the Personal Information necessary for the purposes set out in this Policy.
- 12.2 We retain Personal Information only for as long as is necessary to fulfil those purposes, or for longer where required or permitted by law. When Personal Information is no longer required, we will delete, destroy or de-identify it in a secure manner.

13. Your Rights as a Data Subject

- 13.1 Subject to POPIA, you have the right to:
 - 13.1.1 Be notified that Personal Information about you is being collected, or has been accessed by an unauthorised person.
 - 13.1.2 Request confirmation of whether we hold Personal Information about you, and to request access to that information.
 - 13.1.3 Request the correction, updating or deletion of Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained.
 - 13.1.4 Object, on reasonable grounds, to the processing of your Personal Information, and to withdraw consent where processing is based on consent.
 - 13.1.5 Submit a complaint to the Information Regulator.
- 13.2 To exercise any of these rights, please contact our Information Officer using the details in the Contact Information section. We may require you to verify your identity before acting on a request, and certain requests may be subject to the procedures and fees prescribed under POPIA and the Promotion of Access to Information Act, 2000 ("PAIA").

14. Cookies and Website Analytics

- 14.1 The Site may use cookies and similar technologies to enable core functionality, remember your preferences, and understand how the Site is used.
- 14.2 You can control or disable cookies through your browser settings. Disabling cookies may affect the functionality of the Site.
- 14.3 Where we use analytics tools to measure Site usage, we do so to improve the Site and our services. Any such processing is carried out in accordance with this Policy.

15. Direct Marketing

- 15.1 We will only send you electronic direct marketing where you have consented to receive it, or where you are an existing customer and the marketing relates to our similar products or services and applicable law permits it.
- 15.2 Every electronic marketing communication will give you the opportunity to opt out. You may also withdraw your consent at any time by contacting us using the details below.

16. Information Relating to Children

- 16.1 The Site is not directed at children, and we do not knowingly collect the Personal Information of children. If we become aware that we have collected such information without the consent of a competent person, we will take reasonable steps to delete it.

17. Changes to This Policy

- 17.1 We may update this Policy from time to time. The revised Policy will be posted on the Site with an updated “Last updated” date, and will take effect when posted. We encourage you to review this Policy periodically.

18. Complaints

- 18.1 If you have a concern about how we process your Personal Information, please contact our Information Officer first so that we can address it.
- 18.2 You also have the right to lodge a complaint with the Information Regulator (South Africa):
 - 18.2.1 Website: <https://infoeregulator.org.za>
 - 18.2.2 Email (POPIA complaints): POPIAComplaints@infoeregulator.org.za
 - 18.2.3 Online portal: <https://eservices.infoeregulator.org.za>

19. Contact Information

Paladin Investment Management (Pty) Ltd (FSP 54625)
 Information Officer: Gerhard Visagie

Stellenbosch: Unit 9 Time Square, 9 Elektron Road, Techno Park, Stellenbosch, 7600

Kigali: KN 78 St, Nyarugenge, Kigali, Rwanda

Email: info@paladin.africa

Tel: +27 (0)87 148 6730