

# PRIVACY POLICY

**The Palamo Group**

2024/2025

## 1. Introduction

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- 1.1. This is the privacy policy (“**the Policy**”) of Palamo Holdings Proprietary Limited, Registration number 2021/351329/07 and its subsidiaries (“**Palamo**”).
- 1.2. Palamo is committed to protecting your privacy and to ensuring that personal information is used appropriately and transparently and transferred securely as contemplated in the Protection of Personal Information Act, No 4 of 2003 (“**POPIA**”) and will:
  - 1.2.1. Obtain and process your information fairly;
  - 1.2.2. Keep your information only for one or more specified, explicit, and lawful purposes;
  - 1.2.3. Use and disclose your information only in ways compatible with these purposes;
  - 1.2.4. Keep your information safe and secure;
  - 1.2.5. Keep your information accurate, complete, and up to date;
  - 1.2.6. Ensure that your information is adequate, relevant, and not excessive;
  - 1.2.7. Retain your information for no longer than is necessary for the purpose or purposes;  
and
  - 1.2.8. Provide a copy of your personal data kept to you on request;

## 2. Policy

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### 2.1. Types of personal information we collect:

- 2.1.1. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, age, physical or mental health, well-being, disability, language, and birth;
- 2.1.2. Information relating to the education, medical, financial, criminal or employment history;
- 2.1.3. Identifying number, name, symbol, e-mail address, physical address, telephone number, location information;
- 2.1.4. Biometric information (employees);
- 2.1.5. Correspondence sent/received that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; and
- 2.1.6. We also collect and store any relevant communication e.g. emails, meeting notes etc.

## **2.2. Information sources**

- 2.2.1. We may also supplement the information you have provided with information we receive from other providers like Astute, Google searches, sanction list information requests, independent FICA verification agencies and Insurers to offer a more efficient, consistent and personalised experience.

## **2.3. Using personal information**

- 2.3.1. Administering our relationship with you (including communications and reporting);
- 2.3.2. Marketing and explaining our products and services;
- 2.3.3. Providing a product / service to a you;
- 2.3.4. As part of employee on-boarding or any other internal human resources functions;
- 2.3.5. Conducting credit reference searches or verification;
- 2.3.6. Confirming, verifying, and updating contact details;
- 2.3.7. For the detection and prevention of fraud, crime, money laundering or other malpractice;
- 2.3.8. For audit and record keeping purposes;
- 2.3.9. In connection with legal proceedings;
- 2.3.10. To carry out the services you have requested and to maintain and constantly improve our relationship with you;
- 2.3.11. Providing communications in respect of Palamo and regulatory matters that may affect you;
- 2.3.12. In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law for example to comply with the Financial Intelligence Centre Act requirement to report cash- and suspicious transactions or transactions involving terrorist property;
- 2.3.13. To carry out the transaction(s) requested;
- 2.3.14. For underwriting purposes;
- 2.3.15. Assessing and processing claims;
- 2.3.16. For purposes of claims history; and or
- 2.3.17. Conducting market or customer satisfaction research.

## **2.4. Sharing personal information**

- 2.4.1. We will disclose your personal information to service providers, affiliates for business purposes e.g. to facilitate transactions.
- 2.4.2. We have a mutual understanding with all our service providers with regards to the protection of Personal Information.
- 2.4.3. Due to the nature of our infrastructure, information may also be shared with:

2.4.3.1. Microsoft Corporation; and

2.4.3.2. IPT Holdings (Pty) Ltd.

## **2.5. Sending personal information to foreign countries**

2.5.1. Some of the service providers that we use are located in other countries, for example our cloud storage service providers are located in the European Union. If we send information to anyone who is located in a country that does not have the same level of protection of personal information as South Africa or the European Union, we require that they undertake to protect the personal information of our customers to the same level that we do.

2.5.2. We provide for appropriate safeguards by means of contracts between us and our foreign service providers.

## **2.6. Monitoring of communications**

2.6.1. We record and monitor telephone conversations and electronic communications with you for the purposes of (i) ascertaining the details of instructions given, the terms on which any transaction was executed or any other relevant circumstances, (ii) ensuring compliance with our regulatory obligations; and / or (iii) detecting and preventing the commission of financial crime.

## **2.7. Monitoring of communications**

2.7.1. We have implemented appropriate technical measures to prevent data breaches and have taken reasonable steps to minimise the impact of a breach.

2.7.2. We regularly monitor our systems for possible vulnerabilities and security breaches, but no system is perfect and we cannot guarantee that we will never experience a breach of any of our physical, technical or managerial safeguards. If something should happen, we have taken steps to minimise the threat to your privacy. We will let you know of any breaches which affect your personal information and inform you how you can help minimise the impact.

## **2.8. Your rights under data protection law**

2.8.1. You have the right to be informed about the personal information we have, and what we do with it.

2.8.2. You have the right to:

2.8.2.1. ask us what we know about you;

2.8.2.2. ask what information was sent to our suppliers, service providers or any other third party;

2.8.2.3. ask us to update, correct or delete any out-of-date or incorrect personal information we hold about you if it is no longer necessary to provide services to you (we can unfortunately not take responsibility for incorrect or outdated information if we were provided with incorrect information or you failed to inform us of changes);

2.8.2.4. receive all of the information we have about you and to transfer it to another service provider in machine readable form;

2.8.2.5. unsubscribe from any direct marketing communications we may send you;

2.8.2.6. object to the processing of your personal information.

2.8.3. You can request access to the information we hold about you or correct your personal information by contacting our deputy information officer.

2.8.4. It can take us up to 21 business days to respond to your request, because there are procedures that we need to follow. In certain cases, we may require proof of your identity, and sometimes changes to your information may be subject to additional requirements such as valid proof of residence.

## **2.9. Information Officer and Deputy Information Officer**

2.9.1. The Protection of Personal Information Act appoints the highest level of authority in an organisation as the Information Officer. The Information Officer has been tasked with ensuring compliance with data protection and privacy legislation and regulations.

2.9.2. The Information Officer has appointed a Deputy Information Officer to perform the required tasks.

2.9.3. The details of our Information Officer and Deputy Information Officer are as follows:

### Information Officer

Name and Surname: Nhlanhla Madalane

### Deputy Information Officers

Name and Surname: Lufuno Makhari

The Information Officer and Deputy Information Officers are contactable at our office:

Telephone Number: 012 880 2490

Physical Address: Die Groenhuis, 38 Garsfontein Road, Waterkloof, Pretoria, 0145

Email Address: [lufuno@Palamopartners.com](mailto:lufuno@Palamopartners.com) / [compliance@pallidus.co.za](mailto:compliance@pallidus.co.za)

Website: [www.palamopartners.com](http://www.palamopartners.com)

## **2.10. Updates to this Privacy Policy**

2.10.1. We reserve the right to make changes to this Privacy Policy and any changes to this Policy will be published accordingly.