

Data Protection and Privacy Policy

Policy Name:	Data Protection and Privacy Policy (“Policy”)
Content Controller:	Rupert Boyd, Director and Data Protection Officer
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1. Purpose

This Policy outlines the way in which African Alpha Investment Partners Ltd, and, its affiliated companies worldwide (“African Alpha”) will use the private information that is shared by members of the public and investors with African Alpha, its suppliers or other business partners and the safeguards in place to protect such private information from unauthorized dissemination. We ask that you read this privacy policy carefully.

2. Policy Statement

As a matter of policy, African Alpha seeks to protect the “non-public personal information” of natural person consumers, customers and members of the public. Non-public personal information includes non-public “personally identifiable financial information” plus any list, description, contact information or grouping of customers that is derived from non-public personally identifiable financial information. This Policy explains the types of information that African Alpha collects from its investors and members of the public, how it uses and discloses that information and the measures which African Alpha takes to safeguard that information.

3. Scope

This Policy governs all private information shared by investors and members of the public during their interactions with African Alpha.

4. Review Period

African Alpha will conduct a review of this Policy when significant business process changes occur, to ensure that the information contained herein is still current and applicable.

5. Policy Requirements

5.1. Private information shared by Investors with African Alpha

To comply with anti-money laundering and anti-terrorist activity laws (“AML”), as well as to comply with Know Your Client (“KYC”) guidelines, African Alpha gathers private information on and from investors including (but not limited to):

- Personal mailing and contact information;
- Scanned copies of ID’s and utility invoices;
- Tax ID numbers;
- Information on personal wealth and source of wealth accumulation;
- Corporate incorporation documents;
- Completed tax forms;
- Individual capital account reports on the performance of investors in investments advised/managed by African Alpha;
- Legal agreements; and
- Minutes from investor meetings.

African Alpha provides each investor with all such privacy notices as may be required by law or any rule or regulation.

5.2. Private information shared by members of the public with African Alpha

In the course of its business, African Alpha may also receive personal mailing and contact information from members of the public that are not investors in African Alpha advised/managed special purpose vehicles (“SPVs”). This is information about you that you give to us by filling in forms on our website (or other forms that we ask you to complete), giving us a business card (or similar) or corresponding with us by telephone, post, email or otherwise. It may include, for example, your name, address, email address and telephone number; information about your business relationship with African Alpha; and information about your professional role, background and interests.

5.3. Using and disclosing private information shared by Investors with African Alpha

African Alpha saves private Information on secure cloud-based servers and keeps hard copies of certain private investor information disclosed in subscription forms, KYC documents and other legal agreements. African Alpha regularly discloses certain private information to the AML/KYC administrators (E2S Monitoring Limited in Malta), the registered agents of its advised/managed SPVs or those for which it has introduced Investors (Harneys in the British Virgin Islands, AAA Global Services and Griffon Solutions in Mauritius) and auditors in compliance with local regulations.

African Alpha may be required to disclose personal tax information or other private information it has on individual investors as required by law. We may also be asked to comply with tax authorities in jurisdictions where we operate and where African Alpha advised/managed SPVs are domiciled.

In addition, African Alpha discloses private information for the following reasons:

- To comply with a court order, legal process or other judicial or investigative proceeding that produces a request for information;
- To permit auditing of account information;
- To fulfil or respond to a request from the investor or their authorized representative; and
- To sell or transfer African Alpha’s advised/managed business or assets.

We may disclose personal information about you, where reasonably necessary for the various purposes set out above:

- To the other members of the African Alpha group of companies;
- To your colleagues within the organisation that you represent;
- To service providers who host our website or other information technology systems or otherwise hold or process your information on our behalf, under strict conditions of confidentiality and security;
- To business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you; and
- To business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.

5.4. Safeguarding Private Information shared by Investors and members of the public with African Alpha

African Alpha maintains a hard copy of its files, which are placed behind locked doors when African Alpha staff are not present in the office. In addition, African Alpha uses third party cloud-based service providers, such as DropBox, to maintain soft copies of its files. These third-party service providers are accountable for ensuring such information is not shared to external parties.

All African Alpha employees are bound by codes of professional conduct to protect the confidentiality of investor and member of the public information, and to prevent unauthorized use, access to or disclosure of investor and member of the public information. The use of and access to investor and member of the public information is restricted to those employees who need to know that information to provide services to investors or members of the public.

Any employee who is authorized to have access to non-public personal information is required to keep such information in a secure compartment or receptacle at the close of business each day. All electronic or computer files containing such information shall be secured and protected from access by unauthorized persons. Any conversations involving non-public personal information, if appropriate at all, must be conducted by employees in private, and care must be taken to avoid any unauthorized persons overhearing or intercepting such conversations.

5.5. Communication with Investors and members of the public

When mass communicating with investors and members of the public, African Alpha will include an opt-out of mailing list option to ensure investors and members of the public can easily and securely opt out of future mailings from African Alpha.

5.6. African Alpha's use of private information

We may use your information for the following purposes:

- To operate, manage, develop and promote our business and, in particular, our relationship with the organisation you represent (if any) and related transactions – this includes, for example, marketing and billing/payment purposes;
- To operate, administer and improve our website and premises and other aspects of the way in which we conduct our operations;
- To protect our business from fraud, money-laundering, breach of confidence, theft of proprietary materials and other financial or business crimes; and
- To comply with our legal and regulatory obligations and bring and defend legal claims.

We may, from time to time review information about you held in our systems—including the contents of and other information related to your email and other communications with us for compliance and business protection purposes as described above. This may include reviews for the purposes of disclosure of information relevant to litigation and/or reviews of records relevant to internal or external regulatory or criminal investigations. To the extent permitted by applicable law these reviews will be conducted in a reasonable and proportionate way and approved at an appropriate level of management. They may ultimately involve disclosure of your information to governmental agencies and litigation counterparties as described below.

Your emails and other communications may also occasionally be accessed by persons other than the member of staff with whom they are exchanged for ordinary business management purposes (for example, where necessary when a staff member is out of the office or has left African Alpha).

We will only process your personal information as necessary so that we can pursue the purposes described above, and then only where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes. In exceptional circumstances we may also be required by Law to disclose or otherwise process your personal information. We will tell you, when we ask you to provide information about yourself, if provision of the requested information is necessary for compliance with a legal obligation or, on the other hand, if it is purely voluntary and there will be no implications if you decline to provide the information. Otherwise you should assume that we need the information for our business or compliance purposes (as described above). If you are uncertain as to African Alpha's need for information that we request from you, please contact the African Alpha representative asking for the information, or contact us, with your query.

5.7. Deleting personal information held by African Alpha (upon request)

African Alpha will also have in place a process to delete personal information from investors and members of the public if this is requested from those individuals. Due to securities laws, African Alpha must maintain certain information on investors and members of the public. However, if a member of the public requests their personal information to be deleted from African Alpha's systems, we will ensure this is deleted from our database immediately.

5.8. Your rights

You may have a right of access to the personal information that we hold about you, and to some related information, under data protection law. You can also require any inaccurate personal information to be corrected or deleted. You can object to our use of your personal information for direct marketing purposes at any time and you may have the right to object to our processing of some or all your personal information (and require them to be deleted) in some other circumstances. If you wish to exercise any of these rights, please contact us as set out below.

5.9. Enforcement, Privacy and Consequences of Policy Violation

Employees are responsible for reporting all suspected infractions of this Policy to the Data Protection Officer at Rupert.boyd@africanalphaip.com. When it suspects a Policy violation, African Alpha shall further investigate the matter and is permitted to ask for employee's personal financial records. African Alpha expects full cooperation from all staff in its investigation.

When it finds a Policy violation, African Alpha will exercise its rights to take appropriate disciplinary action including, but not limited to:

- Verbal/written warnings;
- Disciplinary action and/or termination of employment for employees; and
- African Alpha may report suspected violations to law enforcement when appropriate and will cooperate with all local, national and international law enforcement agencies. African Alpha is not responsible for sanctions taken by these agencies for violations of this Policy that are against local and international laws and/or criminal codes.