



**CRATOS ASSET
MANAGEMENT**
INNOVATIVE WEALTH CREATION

PROTECTION OF PERSONAL INFORMATION (POPI) POLICY

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INTRODUCTION

1. Cratos Asset Management Pty Ltd (The “FSP” or “CAM” hereafter) is a private company registered in the Republic of South Africa under registration number 2014/201224/07. CAM is a registered Financial Services Provider (FSP no. 46597) and SARB-registered institutional investor, offering bespoke investment solutions, across a broad array of asset classes, to its private client and institutional client base.
2. As a Financial Services Provider authorized by the Financial Sector Conduct Authority (“FSCA”), CAM offers financial services including Category I and II financial products not limited to but including investment products and options in South Africa and across global exchanges.
3. CAM’s head office is located at 57 Smits Road, Dunkeld, Johannesburg. The current board members are Gary Cahn, Dave Smyth and Desmond Esakov and Clinton Banducci is a Key Individual alongside Dave Smyth. The rest of the team is comprised of portfolio managers, brokers, administrators and support staff.

OBJECTIVE

4. The objective of this policy is to protect CAM’s information assets from threats, whether internal or external, deliberate or accidental, to ensure business continuation, minimise business damage and maximise business opportunities.
5. This policy establishes a general standard on the appropriate protection of personal information within CAM. It provides principles regarding the right of individuals to privacy and to reasonable safeguards of their personal information.

SCOPE

6. This policy applies to the sole proprietor or key individuals, representatives and staff of CAM. The company and key individuals (or management) are ultimately responsible for ensuring that information security is properly managed. The Information Officer, is responsible for:
 - The development and upkeep of this policy.
 - Ensuring this policy is supported by appropriate documentation, such as procedural instructions.
 - Ensuring that documentation is relevant and kept up to date.
 - Ensuring this policy and subsequent updates are communicated to relevant managers, representatives, staff and associates, where applicable.
7. The company and all key individuals, representatives and staff are responsible for adhering to this policy, and for reporting any security breaches or incidents to the Information Officer.
8. The external individual(s) who is (are) contracted to handle the information technology of CAM must adhere to the same information security as that of CAM and will confirm by separate agreement that they have such security measures in place in respect of processing of personal information.

KEY PRINCIPLES

9. The company and each key individual, representative and staff member of CAM is committed to the following principles:
 - To be transparent with regards to the standard operating procedures governing the collection and processing of personal information.
 - To comply with all applicable regulatory requirements regarding the collection and processing of personal information.
 - To collect personal information only by lawful and fair means and to process personal information in a manner compatible with the purpose for which it was collected.
 - Where required by regulatory provisions, to inform individuals when personal information is collected about them.
 - To treat sensitive personal information that is collected or processed with the highest of care as prescribed by regulation.
 - Where required by regulatory provisions or guidelines, to obtain individuals’ consent to process their personal information.

- To strive to keep personal information accurate, complete and up to date and reliable for their intended use.
- To develop reasonable security safeguards against risks such as loss, unauthorized access, destruction, use, amendment or disclosure of personal information.
- To provide individuals with the opportunity to access the personal information relating to them and, where applicable, to comply with requests to correct, amend or delete personal information.
- To share personal information, such as permitting access, transmission or publication, with third parties only with a reasonable assurance that the recipient has suitable privacy and security protection controls in place regarding personal information.
- To comply with any restriction and/or requirement that applies to the transfer of personal information internationally.

MONITORING

10. Management and the Information Officer of CAM are responsible for administering and overseeing the implementation of this policy and, as applicable, supporting guidelines, standard operating procedures, notices, consents and appropriate related documents and processes.
11. The company and Key Individuals, Representatives and staff of CAM are to be trained according to their functions in regulatory requirements, policies and guidelines that govern the protection of personal information. CAM will conduct periodic reviews and audits, where appropriate, to demonstrate compliance with privacy regulation, policy and guidelines.

OPERATING CONTROLS

12. CAM shall establish appropriate privacy standard operating controls that are consistent with this policy and regulatory requirements. This will include:
 - Allocation of information security responsibilities.
 - Incident reporting and management.
 - User ID addition or removal.
 - Information security training and education.
 - Data backup.

IMPLEMENTATION

13. This policy is implemented by CAM and will be adhered to by the company and all key individuals, representatives and staff who are tasked with collecting and processing of personal information. Non-compliance with this policy may result in disciplinary action and possible termination of employment or mandate, where applicable.

AUTHORITY AND MANDATE

14. The Protection of Personal Information Policy is approved by way of approved resolution of the CAM Board. The EXCO is responsible for the adherence to and implementation of this Protection of Personal Information Policy throughout the organization.

Sign off



Name: David Smyth

Date: 16 February 2023

Position: Key Individual