



**CRATOS ASSET
MANAGEMENT**
INNOVATIVE WEALTH CREATION

PRIVACY 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.

GENERAL

4. Your privacy is important to Cratos Asset Management.
5. CAM is a private company registered in the Republic of South Africa and as such is required to comply with the Protection of Personal Information Act No. 4 of 2013 (“POPIA”).
6. CAM is committed to protect the personal data of the individuals whose personal data it collects and processes (“Data Subjects”).

PURPOSE

7. The purpose of this Privacy Statement is to explain how we deal with the personal information of Data Subjects within the framework of the protection laws and regulations that apply to us.

COLLECTION OF DATA

8. We collect and process the personal information of Data Subjects to ensure we provide suitable products and services to our clients.
9. Personal information collected by us includes but may not be limited to the Data Subject’s name, contact details, birth date, identity number, bank account details and financial information.
10. This information is collected directly from Data Subjects during the onboarding process including through the collection of FICA documentation, the signing of mandates and through third party verification services.
11. We seek to update this information from time to time to ensure we have up to date information and when required for account remediation purposes.

PROCESSING OF DATA

12. The information of Data Subjects is used, processed and retained by CAM for one or more of the following purposes:
 - To verify identities in accordance with the Financial Intelligence Centre Act (“FICA”);
 - To screen identities against the sanctions, Domestic Prominent Influential Persons (“DPIP”) and Foreign Prominent Public Officials (“FPPO”) lists and databases;
 - To screen identities for adverse media;
 - To process applications for custodians/prime brokers;
 - To provide ongoing financial and intermediary services (discretionary and non-discretionary);

- To detect and prevent fraud, crime, money laundering or other unauthorised use of our products and services;
 - For audit and record-keeping purposes; In connection with legal proceedings; and
 - To comply with legal and regulatory requirements or industry codes.
13. Personal information of Data Subjects who are minors are processed in the same way but only with the consent of a parent or legal guardian.

SHARING OF PERSONAL INFORMATION

14. The personal information of Data Subjects will only be shared with the following persons and entities with your express permission:
- Necessary CAM staff members;
 - Any financial institutions we partner with to provide products and services to that specific Data Subject (i.e. the relevant custodian or intermediary);
 - Companies and organisations whose services we utilise for purposes of identity verification, screening, client due diligence and processing; and
 - Our professional advisers, consultants and other similar services.
15. In all other instances, the personal information of Data Subjects will be treated as private and confidential and will not be shared with any other person or entity except where:
- The data subject provides us with express permission; or
 - Where CAM may be obliged to disclose to authorities as required by law, in connection with legal proceedings or potential legal proceedings, or for the purposes of protecting the interest of clients.

SAFEKEEPING OF DATA

16. CAM considers the safekeeping of personal information a priority. We take all reasonable technical and organisational precautions to prevent the loss, misuse, or alteration of your personal information.
17. We store all personal information in secured environments, for example on secured servers in protected data centres.
18. Where we interact with third parties and share personal information, we take reasonable steps to impose appropriate security, privacy and confidentiality obligations on those recipients as processors of personal information. This is done to ensure that personal information that we are responsible for is kept secure and only processed lawfully.

RETENTION OF DATA

19. CAM is required to retain the personal data of Data Subjects for the entire duration of our business relationship and for the prescribed statutory period thereafter.

COOKIES AND OUR WEBSITE

20. CAM does collect limited personal information on its website www.cratosam.co.za. This information is limited to names, email addresses and phone numbers for clients and potential clients who enter these details on the website in order to sign up for newsletters and or book appointments with CAM staff.

RIGHT TO ACCESS, UPDATE OR DELETE DATA

21. All Data Subjects have the right to request to review the personal information contained in CAM's records at any time and to update such information.
22. Data Subjects also have the right to request that personal information held by CAM be deleted however CAM may be unable to comply with such request until the business relationship is terminated and the statutory retention period has been observed.

CHANGES TO THIS PRIVACY STATEMENT

23. This Privacy Statement may be amended from time to time to ensure compliance with the privacy laws of South Africa.
24. Should the policy be amended, you will be notified. Alternatively, please visit our website to view our most recent Privacy Statement.

QUERIES RELATING TO THIS PRIVACY STATEMENT

25. Should you have any queries relating to how CAM handles your personal data, please contact us at invest@cratos.co.za.

AUTHORITY AND MANDATE

26. The Privacy Policy is approved by way of approved resolution of the CAM Board. The EXCO is responsible for the adherence to and implementation of this Privacy Policy throughout the organization.

Sign off



Name: David Smyth

Date: 16 February 2023

Position: Key Individual