POLICY REVIEW CONTROL SHEET

Governance Area	Technology, Data & Information Governance
Policy Name	Privacy Statement
Policy Owner	ClearGauge Wealth (Pty) Ltd
Document Owner	Key Individual
Version	1.0
Status	Approved
Classification	Public
Effective Date	1 September 2026
Review Frequency	Annually
Next Review Date	1 September 2027
Date of Review	1 September 2026
Reviewer(s)	Werner Gerber
Summary of Changes	Initial release.
Reason for Changes	Privacy Statement adopted as part of the ClearGauge Wealth Governance Framework upon commencement of business.
Approval Status	Approved
Approved By	Werner Gerber
Approval Date	1 September 2026
Training Date	1 September 2026
Training Conducted By	Werner Gerber
Attendees	Representatives and relevant staff
Implementation Date	1 September 2026
Implementation Confirmation	Privacy Statement approved, communicated to all relevant staff and implemented as part of the ClearGauge Wealth Governance Framework.

CLEARGAUGE WEALTH PRIVACY STATEMENT

CONTENTS

1. INTRODUCTION

ClearGauge Wealth is an authorised Financial Services Provider ("FSP"). We are committed to protecting your personal information and processing it lawfully, fairly, and transparently in accordance with the Protection of Personal Information Act, 2013 ("POPIA") and other applicable legislation.

This Privacy Statement explains how we collect, use, store, share, and protect your personal information when providing financial advice and intermediary services.

For purposes of this Privacy Statement:

- "You" and "your" refer to the principal party to the business relationship, policy, or financial service.
- "Personal information" includes information relating to you and, where applicable, your spouse, dependants, beneficiaries, or other persons connected to the services we provide.
- "Special personal information" has the meaning assigned to it in POPIA and may include information such as health information where required for the provision of financial products or services.
- "Process" or "processing" means the collection, recording, organisation, storage, updating, use, sharing, distribution, retention, deletion, or destruction of personal information.
- "Competent person" means a person legally authorised to provide consent on behalf of a child, such as a parent or legal guardian.

2. PERSONAL INFORMATION WE COLLECT

We collect personal information directly from you and, where necessary, from third parties such as product suppliers, financial institutions, service providers, regulatory authorities, and publicly available sources.

The personal information we collect may include:

- Identification and contact information;
- Financial information, including income, assets, liabilities, and expenses;
- Risk profile information, financial objectives, and financial needs;
- Policy and product-related information;
- Health information and other special personal information where required;
- Information required for regulatory compliance purposes; and
- Any other information necessary to provide financial advice, intermediary services, and ongoing support.

We only collect personal information that is relevant and necessary for the purposes described in this Privacy Statement.

3. PURPOSE OF PROCESSING

We process your personal information to:

- Provide financial advice and intermediary services;
- Conduct needs analyses and assess your financial circumstances, objectives, and requirements;
- Recommend appropriate financial products and services;
- Prepare and maintain records of advice;
- Administer and service policies, investments, and financial products;
- Communicate with you regarding your financial products and services;
- Verify your identity and conduct due diligence procedures;
- Detect and prevent fraud, financial crime, and other risks;
- Conduct sanctions screening and regulatory compliance checks;
- Comply with legal and regulatory obligations; and
- Improve and tailor our services to better meet your needs.

The accuracy and completeness of your personal information directly affect our ability to provide suitable financial advice and services.

4. LAWFUL BASIS FOR PROCESSING

We process your personal information on one or more of the following lawful grounds:

- Your consent, where required;
- The performance of a contract or steps taken prior to entering into a contract;
- Compliance with legal and regulatory obligations;
- The protection of your legitimate interests or those of your dependants and beneficiaries; and
- Our legitimate business interests, provided such interests do not override your rights and freedoms.

5. PERSONAL INFORMATION RELATING TO THIRD PARTIES

In the course of providing financial services, you may provide us with personal information relating to your spouse, dependants, beneficiaries, employees, or other third parties.

By providing such information, you confirm that:

- You have obtained the necessary consent or authority to provide such information to us; or
- You are otherwise legally entitled to provide such information.

Where information relating to a minor is provided, you confirm that you are a competent person authorised to provide consent on the minor's behalf.

We may process such information where necessary for the administration of policies, benefits, investments, financial products, and related services, and for the purposes set out in this Privacy Statement.

6. SHARING OF PERSONAL INFORMATION

We may share your personal information where necessary with:

- Product suppliers, insurers, investment platforms, and administrators;
- Third-party service providers and contractors;
- Compliance officers, auditors, legal advisers, and professional consultants;
- Regulatory and supervisory authorities, including the Financial Sector Conduct Authority ("FSCA");
- The Financial Intelligence Centre ("FIC") and other authorities where required by law; and
- Other parties where disclosure is necessary to provide services or comply with legal obligations.

We will only disclose personal information where:

- Disclosure is required to provide services to you;
- Disclosure is required by law or regulation;
- You have authorized the disclosure; or
- Disclosure is necessary for a legitimate purpose related to the services we provide.

All third parties receiving personal information are required to maintain appropriate confidentiality and security measures and to process such information in accordance with applicable legislation.

7. SANCTIONS SCREENING AND REGULATORY REPORTING

To comply with applicable legislation and regulatory requirements, we may process your personal information for sanctions screening, anti-money laundering, counter-terrorist financing, and related compliance purposes.

Where required by law, we may disclose relevant personal information to regulatory authorities, law enforcement agencies, or other authorized bodies.

We reserve the right to terminate a business relationship where legislation, sanctions requirements, or regulatory obligations prohibit us from continuing such relationships.

8. DIRECT MARKETING AND COMMUNICATIONS

We may communicate with you regarding:

- Existing products and services;
- Changes to policies, benefits, fees, or terms and conditions;
- New products or services that may be relevant to your financial needs; and
- Regulatory, compliance, or service-related updates.

You may opt out of receiving marketing communications at any time by notifying ClearGauge Wealth. We will give effect to your request as soon as reasonably practicable.

Please note that you may still receive communications relating to the administration of existing products, services, or legal obligations.

9. RECORD RETENTION

We retain personal information for as long as necessary to fulfil the purposes for which it was collected and to comply with applicable legal and regulatory requirements.

In terms of POPIA, the Financial Advisory and Intermediary Services Act ("FAIS"), the Financial Intelligence Centre Act ("FICA"), and other applicable legislation, certain records must be retained for at least five years or such longer period as may be required by law.

Where personal information is no longer required, it will be securely deleted, destroyed, or anonymized in accordance with applicable legal requirements.

10. CONFIDENTIALITY AND SECURITY

We are committed to protecting your personal information and maintaining its confidentiality.

We implement appropriate, reasonable technical and organizational safeguards to protect personal information against loss, unauthorized access, misuse, alteration, destruction, or disclosure.

Access to personal information is restricted to authorized persons who require access in order to perform their duties.

While we take reasonable measures to protect personal information, no method of transmission or storage can be guaranteed to be completely secure.

11. CROSS-BORDER TRANSFERS

Your personal information may be transferred outside South Africa where necessary for:

- The administration of financial products or services;
- The use of cloud-based systems and service providers;
- Offshore investments or financial services; or
- Any other legitimate business purpose related to the services provided to you.

Where personal information is transferred internationally, ClearGauge Wealth will take reasonable steps to ensure that appropriate safeguards are in place and that the recipient is subject to laws, binding agreements, or measures that provide an adequate level of protection.

12. YOUR RIGHTS

Subject to applicable legal limitations, you have the right to:

- Access the personal information we hold about you;
- Request correction or updating of inaccurate or incomplete information;
- Object to certain forms of processing;

- Request deletion, destruction, or anonymization of personal information where permissible;
- Withdraw consent where processing is based on consent; and
- Lodge a complaint with the Information Regulator.

Requests for access to personal information must be made in accordance with the Promotion of Access to Information Act ("PAIA") and our PAIA Manual.

We may take reasonable steps to verify your identity before providing access to personal information and may charge a prescribed fee where permitted by law.

13. COMPLAINTS

If you believe that your personal information has been processed contrary to this Privacy Statement or applicable legislation, you are encouraged to contact ClearGauge Wealth first so that we may attempt to resolve the matter.

If you remain dissatisfied, you may lodge a complaint with the Information Regulator using the contact details set out in Section 15.2.

14. AMENDMENTS

ClearGauge Wealth reserves the right to amend this Privacy Statement from time to time. The latest version will be made available on our website or upon request.

Any amendments will become effective upon publication unless otherwise required by law.

15. CONTACT DETAILS

15.1. CLEARGAUGE WEALTH INFORMATION OFFICER

Field	Details
Name	Werner Gerber
Business Address	34 Jimmy Smith, Sandbaai, Hermanus, 7200
Telephone	071 494 9405
Email	werner.gerber@cleargaugewealth.co.za
Website	www.cleargaugewealth.co.za

15.2. INFORMATION REGULATOR

Field	Details
Business Address	Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg 2017
Telephone	010 023 5200
Toll-Free	0800 017 160
Email	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za