



PRIVACY NOTICE

THE PROTECTION OF PERSONAL INFORMATION ACT

This Notice explains how SPEAR Capital Pty Ltd (“we” or “us” or “our”) obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act (“POPIA”). At SPEAR Capital Pty Ltd, we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

About the Company

SPEAR Capital Pty Ltd provides advice to a fund manager and two private equity funds that provide growth capital to SMEs focused on fast moving consumer goods (FMCG) and local production in a few carefully selected countries in Africa.

The Definition of Personal Information

According to the Act “personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act, our company also includes the following items as personal information: All addresses including residential, postal and email addresses.

Information relates to but is not limited to:

1. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
2. information relating to the education or the medical, financial, criminal or employment history of the person;
3. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
4. the biometric information of the person;
5. the personal opinions, views or preferences of the person;
6. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
7. the views or opinions of another individual about the person; and
8. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

The type of information that we collect

In order to conduct our services, we collect and process information pertaining but not limited to the following:

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1. Current and prospective third-party service providers and their representatives:

- Contact information for example physical addresses, contact numbers and email addresses;
- Business information, such as the goods or services it provides, financial history, its performance and reputation, and cost to us;
- Appropriate quotes and costings.

2. Current and prospective portfolio companies and their representatives:

- Contact information for example physical addresses, contact numbers and email addresses;
- Financial and Operational information for example Management Accounts, Annual Financial Statement, details of Assets and Liabilities, Patents, Suppliers and Customers;
- Information Obtained during Due Diligence exercises for example Environmental, Health and Safety operations, Legal status, Governance Structures;
- Transaction documents for example Shareholders agreements, Share certificates and registers.

3. Counterparties to transactions and their representatives:

- Contact information for example physical addresses, contact numbers and email addresses;
- Business information, such as the goods or services it provides, financial history, its performance and reputation, and cost to us.
- Information Obtained during Due Diligence exercises for Legal status, Governance Structures;

4. Other service providers:

- Industry contacts: contact information for example physical addresses, contact numbers and email addresses;
- Deal generators: contact information for example physical addresses, contact numbers and email addresses;
- Information Providers: contact information for example physical addresses, contact numbers, email addresses, website.

The collection and processing of prospective and current employee information is not covered in this Privacy Policy and is addressed elsewhere.

We do not use cookies to track website data.

How we collect and use your information

We will use personal information only for the purposes for which it was collected and agreed. In addition, where necessary, personal information may be retained for legal or research purposes.

1. Current and prospective third-party service providers and their representatives

We collect information on current and prospective service suppliers when considering whether to purchase their goods and services. This is normally in person, via online meetings or email communication.

We use the information we collect about a service provider to:

- Contract a service provider's goods or services;
- Evaluate the impact versus the cost of the goods and services;
- Communicate and maintain our relationship with the service provider.

2. Current and prospective portfolio companies and their representatives

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We collect information on our current and prospective portfolio companies when communicating with them either in person, via online meetings or email communication.

We use the Personal Information we collect about current and prospective portfolio companies to:

- Assess the attractiveness of the potential company as an investment;
- Evaluate, monitor and review the performance of the portfolio company;
- Evaluate, monitor and review the environmental and social governance obligations of the portfolio company;
- Provide support to the portfolio company whether it be financial, strategic or other;
- Report to our clients on the above;

3. Counterparties to transactions and their representatives

We collect information on counterparties to transactions when communicating with them either in person, via online meetings or email communication.

We use the information we collect about counterparties to:

- Decide whether to transact with the counterparty;
- Communicate with the counterparty regarding the transaction;
- Conduct Due Diligence; Environmental, Social and Governance; and Risk Management assessments relating to the counterparty;
- Exercise our rights or perform our obligations under the transaction.

4. Other service providers

- Industry contacts: we may require information in the Due Diligence process and to assess the industry;
- Deal generators: we may use information for communication on potential portfolio companies;
- Information Providers: we may use this information for Due Diligence, monitoring, performance reviews and reporting.

Personal Information on the Representatives of the above categories may also be obtained and processed. This data may include, but not limited to:

- Contact information for example physical addresses, contact numbers and email addresses;
- Employment and education history;
- Due Diligence information for example legal status, criminal record and nationality.

Disclosure of information

We may disclose personal information to our service providers who are involved in the delivery of products or services. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

Information Security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue

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to review our security controls and related processes to ensure that personal information remains secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass personal information agrees to treat this information with the same level of protection as we are obliged to.

Your Rights: Access to information

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers/addresses as provided below and specify what information you require. We will need a copy of your ID document to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

Correction of your information

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate.

How to contact us

If you have any queries about this notice; you need further information about our privacy practices; wish to withdraw consent; exercise preferences or access or correct your personal information, please contact us at the contact details below:

| | |
|-------------------|---|
| Company name: | SPEAR Capital |
| For attention: | The Information Officer |
| Postal Address: | 14 Lady Anne Ave, Newlands, 7725, Cape Town, South Africa |
| Email address: | btu@spearcapital.com |
| Telephone number: | +27 82 414 6926 |

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To receive a copy of our Promotion of Access to Information Act (PAIA) Section 51 Manual, please contact the Information officer.

SPEAR Capital Pty Ltd retains the right to change the above Privacy Policy at our discretion. Frequent review of the Privacy Policy is encouraged.