

**TURLOV FAMILY OFFICE SECURITIES (PTY) LTD**  
**PROTECTION OF PERSONAL INFORMATION POLICY**  
**February 2026**

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<b>Policy owner</b>	Legal Department		
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## 1. INTRODUCTION

Turlov Family Office Securities (PTY) Ltd is a company established under the laws of the Republic of South Africa, registration 2022/274852/07, hereinafter referred to as the “Company” or the “FSP”, authorized by Financial Sector Conduct Authority of the Republic of South Africa (“FSCA”) to provide investment services and perform investment activities specified in our licence (license number 52874).

The purpose of this document is to outline the Company’s commitment to the Protection of Personal Information Act (POPIA) and to formalise our processes regarding the lawful processing, collection, and storage of personal data.

## 2. PERSONAL INFORMATION

Personal information is collected only when an individual knowingly and voluntarily submits information. Personal Information may be required to provide an individual with further services or to answer any requests or enquiries relating to this service.

It is the Financial Services Providers (FSP) intention that this policy will protect an individual’s personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.

The FSP collects, stores and uses the personal information provided by a natural / juristic person, to provide financial services.

## 3. USE OF INFORMATION

The FSP needs to collect personal or other information:

- For underwriting purposes;
- Assessing and processing claims;
- Confirming and verifying an individual’s identity;
- For purposes of claims history;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- Conducting market or customer satisfaction research;
- For audit and record keeping purposes;
- In connection with legal proceedings;
- Follow an individual’s instructions;
- Inform an individual of services and direct marketing of any form of electronic communication, including SMS and emails;
- Make sure the FSP’s business suits the individual’s needs.

Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, is stored in archives for record-keeping and back-up purposes only.

The FSP will not, without an individual's consent, share information with any other third parties, other than where required by law for any purposes whatsoever.

#### **4. SECURITY**

The FSP strives to ensure the security, integrity and privacy of personal information submitted. The FSP will review and update its security measures in accordance with future legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, the FSP will endeavour to take all reasonable steps to protect the personal information, which an individual submits to the FSP or to the FSPs online products and services. The FSP will always set the highest standards to ensure the integrity of their systems.

The FSP may engage with other organisations to provide support services to the FSP. Third Parties are obliged to respect the confidentiality of any personal information held by the FSP. A Service Level agreement is in place with all Third parties to ensure adherence to all Privacy Policies.

The FSPs employees are obliged to respect the confidentiality of any personal information held by the FSP. All employees are required to sign an employment contract which includes a confidentiality clause.

The FSP will not reveal any personal information to anyone unless:

- It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law;
- It is in the public interest;
- The FSP needs to do so to protect their rights.

The FSP endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date. If at any time, an individual discovers that information gathered about them is incorrect, they may contact the FSP to have the information corrected.

The FSP recognises the importance of protecting the privacy of information collected about individuals, information that is capable of identifying an individual (personal information).

#### **5. STORAGE OF PERSONAL DATA**

Personal data that an individual provide to the FSP's website, including name, postal address, email address, or other personal details when completing a form or leaving comments, along with the IP address and time, will only be utilized by the FSP for the purpose mentioned here, will be stored securely and will not be obtained by third parties.

Consequently, we are making use of personal data for communication purposes only from users who are willing to contact and to offer the product and services provided on the website. The FSP will not disclose personal details without individual's allowance, but it is not possible to exclude the risk of this information being accessed by someone else illegally.

## 6. CONTACT INFORMATION

Any questions relating to the FSP's privacy policy or the treatment of an individual's personal data may be addressed to the contact details below:

Information officer: Oleksandr Tsyhlin

Telephone number: +27 213004787, +27 66 501 8048

Fax number: n/a

Postal address: Carpe Diem Building, Block C2 & C4, 26 Quantum Street, Techno Park, Stellenbosch, Western Cape, 7600, South Africa

Physical address: Carpe Diem Building, Block C2 & C4, 26 Quantum Street, Techno Park, Stellenbosch, Western Cape, 7600, South Africa

Email address: [info@tfos.com](mailto:info@tfos.com)

Website: <https://tfos.com/>