TURLOV FAMILY OFFICE SECURITIES (PTY) LTD

PROTECTION OF PERSONAL INFORMATION (POPI) POLICY

September 14, 2026

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Policy owner	Legal Department		
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Introduction

TURLOV FAMILY OFFICE SECURITIES (PTY) LTD is a private company established and existing under the laws of the Republic of South Africa, registration 2022/274852/07 (hereinafter referred to as the "**Company**", authorised by the Financial Sector Conduct Authority of the Republic of South Africa (the "**FSCA**") to provide investment services and perform investment activities specified in our licence (license No. 52874).

As part of the day-to-day business of the Company and to provide our customers and potential customers with our products and services, we need to process the personal information (which may include special personal information) of our customers and potential customers. References to "**Personal Information**" throughout this document include references to "special personal information" as applicable.

The right to privacy is an integral human right recognised and protected in the South African Constitution and the Protection of Personal Information Act 4 of 2013 (the "**POPIA**"). The Company is committed to protecting your right to privacy, protecting your Personal Information and ensuring your Personal Information is processed lawfully and in a reasonable manner that does not infringe on your right to privacy and always complies with POPIA.

The Company acts in its capacity as a responsible party (or an operator if the context requires) for the purposes of POPIA when processing your Personal Information. Any reference to "you", "your" or "yours" is a reference to any of our clients or potential clients who are considered data subjects for the purposes of POPIA. This Protection of Personal Information (POPI) Policy (the "**Policy**") sets out how we process your Personal Information and sets out your rights in respect of us processing your Personal Information. Defined terms used but not defined in this Policy have the same meaning as in POPIA.

The purpose of this document is to outline the Company's commitment to POPIA and to formalise our processes regarding the lawful processing, collection, and storage of Personal Information.

Purpose of collecting and processing

Where Personal Information is provided directly by an individual/legal entity, such information is deemed to have been provided knowingly and voluntarily. The Company processes such Personal Information to assess applications, establish and maintain the business relationship, provide its products and services comply with applicable legal and regulatory obligations, and for any other lawful purpose described in this Policy.

The Company collects, uses, stores and otherwise processes Personal Information for one or more of the following purposes, to the extent permitted or required by applicable law:

- establishing, verifying and maintaining client relationships, including client and prospective client onboarding, account opening and account administration;
- complying with applicable laws, regulations, regulatory requirements and industry standards, including, without limitation, the Financial Intelligence Centre Act, 2001 ("**FICA**"), POPIA, tax reporting obligations and other legal or regulatory requirements;
- verifying identity, conducting customer due diligence, sanctions screening, source of funds and source of wealth verification, and carrying out risk assessments;

- providing, administering and managing the Company's products and financial services, including executing client instructions and servicing client accounts;
- Fraud prevention, AML/CTF (ML/TF) monitoring, and fulfilling applicable monitoring, reporting and disclosure obligations;
- assessing, investigating and processing complaints, claims and disputes;
- establishing, exercising or defending legal rights, including in connection with legal proceedings, regulatory investigations or enforcement actions;
- communicating with you regarding your accounts, transactions, products, services, regulatory matters and any changes affecting the business relationship;
- maintaining records, conducting audits, ensuring regulatory compliance, managing operational and legal risks, and supporting the Company's governance and internal control framework; and
- where permitted by applicable law and, where required, with your consent, informing you about the Company's products, services, promotions and other business developments, including by means of electronic communications such as email, SMS, telephone or other electronic communication channels.

What Personal Information do we collect

We collect Personal Information (which may include special personal information) necessary to fulfil our obligations to our clients and potential clients while providing our products and/or services which include a broad range of financial services and technology services, including, but is not limited to:

- Identification and contact details;
- Financial and banking information;
- Source of funds and wealth information;
- Tax identification information;
- Transactional and account data;
- Biometric data (where required for identity verification); and
- Any other information required by law or necessary for the provision of services.

Kindly note that we only process information which constitutes your special personal information with your express consent as set out in the relevant contractual terms, including but not limited to, the General Terms of Business (the "**General Terms**") or other agreements entered into with you unless such express consent is not required in terms of POPIA or where we are an operator of a responsible party who has received your express consent or is otherwise authorised to process your special Personal Information. Please note that if you provide us with Personal Information of third parties, you warrant us that you have obtained their express consent to do so.

We also keep records, current and historical, of your investments and transactions as well as records of your investment performance. The information which we collect is in compliance with our legal and regulatory obligations and duties based on the licences we hold and the laws which are applicable to the products and services we provide.

We also keep track of our websites and the pages our customers visit within the Company (desktop platform/mobile app), to provide the most effective user experience for our clients/potential clients which may include product/feature enhancement/amendments and targeted educational and marketing content.

Where we use third parties to process your Personal Information on our behalf, we do so in accordance with the provisions of POPIA.

How do we collect your Personal Information

We collect your Personal Information in numerous ways, for example: your use of our services and other dealings with us including through the account opening process, accessing our services or products directly from us or through our business partners, information provided and collected during your use of our products and platforms, information is also collected during correspondence and ongoing customer due diligence. We may also collect Personal Information about you from publicly available sources.

In compliance with our regulatory duties and laws applicable to us, we may record communications with you which include telephonic, electronic, in person or other methods of communication between us. If you visit our offices, we may have cameras which may record your images and conversations.

Additionally, we obtain Personal Information about you through your use of our websites, platforms, applications, or through the use of cookies and pixel tracking, using both internal and third-party software services, in particular by recording your activity and which pages you look at on our websites and your activity on our platforms for the purpose of conversion tracking and serving communications and ads that are relevant to your interests.

Legal basis for processing Personal Information

In most instances we are required to process your Personal Information to comply with the laws and/or regulations which are applicable to us and to the products and services we provide. However, POPIA and other applicable data protection legislation allows us to process your Personal Information if:

- we obtain your consent;
- the processing is necessary for us to carry out actions for the conclusion of our performance under a contract entered into between us;
- the processing complies with an obligation imposed on us as the responsible party by law;
- the processing protects your legitimate interests;
- the processing is necessary for the proper performance of a public duty or in the public interest; or
- the processing is necessary for pursuing our legitimate interests as the party responsible or those of a third party to whom the information is supplied.

All the processing of Personal Information carried out by us is in accordance with the aforementioned permitted purposes. Where our processing of your Personal Information requires your express consent, we will request your consent, or the consent from another party that has the required authority/competency to do so on your behalf.

If we rely on your consent as set out above as the lawful basis for processing your Personal Information, please note that you have the right to withdraw that consent at any time by contacting us using the contact details specified below in this Policy. However, please note that your ability to withdraw your consent may be limited

by law and may likely mean that we are no longer able to continue to provide services to you and will need to terminate the relationship.

Disclosure of Personal Information

The Company does not sell, trade or rent your Personal Information to third parties without your consent except in cases provided by applicable law. However, the Company may share your Personal Information with selected third parties which include, but not limited to:

- governmental, judicial or regulatory authorities or agencies (including the Financial Intelligence Centre (FIC) and the FSCA) to comply with our legal and regulatory obligations;
- our service providers, suppliers and sub-contractors for the performance of any contract we have entered into with them (including identity verification, IT, compliance, and payment service providers) in respect of our services and products provided to you or in respect of running our internal business operations;
- banks, other financial services providers where we act as the intermediary on your behalf in accordance with our contract with you (including crypto-asset service providers and financial institutions involved in payment processing);
- introducing agents, marketing partners, referral partners or introducing brokers (through a marketing referral program or other introducing (referral) programs, collectively – the "**Referring Partners**"), where you have accessed and opened an account with the Company using the Referral Partner's referral link and have been introduced to the Company as a referred client. In such cases, the Company shall:
    a) transfer a limited amount of Personal Information strictly necessary for purposes of administering affiliate relationship (including calculating fees for referral activities), including your account number, full name, manager's details (if applicable), and the data forming the basis for the calculation of referral commissions;
    b) ensure that each of the Referring Partners maintains the confidentiality and security of your Personal Information and only processes such information for the purposes for which it was provided;
- any person or entity where disclosure is required or permitted in the public interest, or where reasonably necessary to establish, exercise or protect the Company's legal rights or legitimate interests;
- fraud prevention agencies and other organisations to prevent or detect financial crime; and
- other financial institution, insurers, data platforms, and other approved third parties, solely to the extent necessary to conduct lawful market research in furthering our legitimate business interests under the applicable law and General Terms.

All third parties, including the Referring Partners, are required to maintain appropriate confidentiality and security safeguards and may process Personal Information only for the purposes authorised by the Company and permitted under applicable law.

Cross-Border Transfers

Your Personal Information may be transferred to our service providers, suppliers or sub-contractors and processed in jurisdictions outside the Republic of South Africa, where necessary for service provision or regulatory compliance. The Company ensures that such transfers are subject to adequate data protection safeguards as required by POPIA and other applicable laws.

Security of Personal Information

The Company maintains appropriate technical and organisational measures designed to protect Personal Information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, in accordance with POPIA and applicable regulatory requirements. These measures are reviewed and updated periodically to address changes in legal requirements, technology and information security risks. The responsibility for maintaining the confidentiality of Personal Information also falls on the Company's employees and representatives.

While no method of transmission over the Internet or electronic storage can be guaranteed to be completely secure, the Company takes reasonable steps to safeguard Personal Information. In the event of a security compromise, the Company will notify affected data subjects and the Information Regulator where required by applicable law.

Where the Company engages third-party service providers to process Personal Information on its behalf, it requires such providers to implement appropriate security measures and to process Personal Information only in accordance with applicable law, contractual confidentiality obligations and the Company's instructions.

How do we store Personal Information

If your Personal Information is no longer needed by us, we will take the appropriate steps to remove the details which may identify you and securely destroy the records. Please note that applicable laws may require us to hold your Personal Information for a period of time after our relationship has ended. For example, the anti-money laundering and anti-terrorist financing laws which we are required to abide by, require us to retain certain records for a minimum period of five (5) years following the termination of our business relationship or the completion of the relevant transaction, as applicable.

Where permitted or required by applicable law, or where necessary for our legitimate business purposes, including compliance, risk management or fraud prevention, the Company may retain such records for a longer period. As a matter of internal policy, the Company generally retains client records for seven (7) years unless a longer retention period is required or permitted by applicable law.

The Company takes reasonable steps to ensure that the Personal Information it holds is accurate, complete, up to date and securely maintained. If you believe that any Personal Information held by the Company is inaccurate or incomplete, you may request that the Company correct or update such information in accordance with applicable law.

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 are stored in archives for record-keeping and back-up purposes only. Your Personal Information will be retained only for as long as (i) required by law, (ii)

necessary to fulfil the purposes for which it was collected or (iii) required for legitimate business, regulatory, or audit purposes.

Note: *the Company uses Personal Information to communicate with clients and prospective clients regarding its products, services and other matters relating to the business relationship, in accordance with applicable law and, where required, with the individual's consent. The Company does not disclose Personal Information to third parties except as described in this Policy, where authorised by the data subject, or where required or permitted by applicable law. While the Company implements appropriate technical and organisational measures to protect Personal Information, no method of electronic transmission or storage can be guaranteed to be completely secure, and unauthorised access by third parties cannot be entirely eliminated*.

What are your rights as a data subject

POPIA provides that you as a data subject have the right to have your Personal Information processed in accordance with the conditions for lawful processing including, in summary, the right, amongst others:

- Request access to your Personal Information;
- Request correction, deletion, or restriction of processing of your Personal Information;
- Object to the processing of your Personal Information on reasonable grounds;
- Withdraw consent, subject to legal and contractual limitations;
- Lodge a complaint with the Information Regulator:

  Information Regulator (South Africa):
  POPIAComplaints@inforegulator.org.za
  https://inforegulator.org.za/.

Links to external websites

Our site and systems may contain links to and from other websites. If you follow a link to another website, please note that these websites have their own privacy policies, and we do not accept any liability for how these websites process your Personal Information.

Contact information

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

- **Information officer**: Oleksandr Tsyhlin
- **Phone number**: +27 21 300 4787
- **Postal address**: Carpe Diem Building, Block C2 & C4, 26 Quantum Street, Techno Park, Stellenbosch, Western Cape, 7600, Republic of South Africa
- **Physical address**: Carpe Diem Building, Block C2 & C4, 26 Quantum Street, Techno Park, Stellenbosch, Western Cape, 7600, Republic of South Africa
- **Email**: info@tfos.com
- **Website**: https://tfos.com/