IF CAPITAL (PTY) LTD

Privacy Statement

IFC-CMP-003 | Privacy Statement | v1 | September 2026

Registration No. 2018/530982/07 | FSP 51648 | Category I and Category II Financial Services Provider

POLICY REVIEW CONTROL SHEET		
Governance Area	Technology, Data & Information Governance (as per Governance Framework)	
Policy Reference & Name	IFC-CMP-003 | Privacy Statement	
Policy Owner (FSP) & Version #	If Capital (Pty) Ltd | FSP 51648	Version 1
Original & Previous Approval	First formal adoption: September 2026	Previous version: Not applicable
Review Frequency & Month	Annually	May
Next Review Date & Month	2027	May

POLICY REVIEW DETAILS	
Date of Review	14-09-2026
Reviewer Name(s)	Frederik Jacobus Van Zyl du Preez (Key Individual & Chief Investment Officer); Zoë Frances Travers (Research Analyst)
Summary of Changes	New policy. Drafted for If Capital (Pty) Ltd for publication on the If Capital website and issue to clients and advisers on request.
Reason for Changes	First formal adoption of a POPIA-compliant Privacy Statement within the If Capital policy library.
Approval Status	Approved
Approved By / Signature(s)	FJV du Preez
Approval Date	14-09-2026

CHANGE LOG

Date	Change Description	Changed By	Version #
September 2026	First issue of the If Capital Privacy Statement (IFC-CMP-003).	FJVZ du Preez	v1

TRAINING & IMPLEMENTATION	
Planning	**Responsible Person: Frederik Jacobus Van Zyl du Preez**
Publication	Statement published on ifcapital.co.za and made available on request.
Staff briefing	Covered under the POPIA stream of the Annual Training Plan (IFC-CMP-002).
Adviser & platform notification	Issued to the adviser network and included in the client onboarding pack.

CONFIRMATION OF TRAINING & IMPLEMENTATION	
Confirmation	**Responsible Person: Frederik Jacobus Van Zyl du Preez**
Date, Time, Attendees and Presentation recorded in the In-House Training Register	
Date completed	
Signature	

If Capital Privacy Statement

1. Introduction

If Capital (Pty) Ltd ("If Capital", "we", "us" or "our"), Registration No. 2018/530982/07, is an authorised Financial Services Provider (FSP 51648) licensed by the Financial Sector Conduct Authority ("FSCA") in terms of the Financial Advisory and Intermediary Services Act, 2002 ("FAIS") as a Category I and Category II provider.

We are committed to protecting your personal information and to 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 we provide discretionary investment management and related intermediary services, and when you use our website at www.ifcapital.co.za.

If Capital acts as a discretionary investment manager in terms of a written mandate. We do not provide financial advice and do not conduct suitability or needs assessments. Where financial advice is rendered to you, it is rendered by your own financial adviser under a separate FSP licence, and that adviser is responsible for its own processing of your personal information under its own privacy statement.

2. Definitions

For purposes of this Privacy Statement:

- "You" and "your" refer to the principal party to the business relationship, mandate, portfolio or financial service.
- "Personal information" includes information relating to you and, where applicable, your spouse, dependants, beneficiaries, trustees, directors, members, or other persons connected to the services we provide.
- "Special personal information" has the meaning assigned to it in POPIA.
- "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 consent on behalf of a child, such as a parent or legal guardian.
- "Responsible party" means If Capital, which determines the purpose of and means for processing your personal information.

3. Personal Information We Collect

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

The personal information we collect may include:

- Identification and contact information, including identity or registration numbers, tax reference numbers and banking details;
- Financial information, including income, assets, liabilities, source of funds and source of wealth;
- Investment mandate information, including risk profile, investment objectives, restrictions and time horizon as recorded in your mandate or supplied by your financial adviser;
- Portfolio, holding, transaction and platform account information;
- Information required for compliance with the Financial Intelligence Centre Act, 2001 ("FICA"), including customer due diligence and beneficial ownership information;
- Information relating to complaints, queries and communications with us;
- Website and electronic information, including IP address, browser type, device information and pages visited; and

- Any other information necessary to manage your portfolio, administer your mandate and provide ongoing service.

We only collect personal information that is relevant and necessary for the purposes described in this Privacy Statement. We do not require special personal information in the ordinary course of discretionary portfolio management, and will only process it where it is necessary and permitted in terms of POPIA.

4. Purpose of Processing

We process your personal information to:

- Accept, record and give effect to your discretionary investment mandate;
- Construct, manage, rebalance and monitor your portfolio in accordance with that mandate;
- Place and settle transactions with brokers, platforms, product suppliers and administrators;
- Administer, report on and service your portfolio, including performance and fee reporting;
- Communicate with you and your financial adviser regarding your portfolio;
- Verify your identity and conduct customer due diligence in terms of FICA;
- Detect and prevent fraud, financial crime and other risks;
- Conduct sanctions screening and regulatory compliance checks;
- Comply with legal, regulatory and reporting obligations, including those imposed by the FSCA, the Financial Intelligence Centre ("FIC") and the South African Revenue Service; and
- Maintain our records, manage complaints, and improve our services and systems.

The accuracy and completeness of your personal information directly affect our ability to manage your portfolio and to meet our regulatory obligations.

5. Lawful Basis for Processing

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

- Your consent, where consent is required;
- The performance of a contract or mandate, or steps taken prior to entering into one;
- Compliance with a legal or regulatory obligation imposed on us;
- 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.

6. Personal Information Relating to Third Parties

In the course of providing our services, you may provide us with personal information relating to your spouse, dependants, beneficiaries, trustees, directors, members, 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 consent on the minor’s behalf.

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

7. Sharing of Personal Information

We may share your personal information, where necessary, with:

- Your appointed financial adviser and their FSP;
- Product suppliers, LISP platforms, investment administrators, custodians, brokers and counterparties;
- Third-party service providers and contractors, including information technology, data, reporting and administration providers;

- Compliance officers, auditors, legal advisers and professional consultants;
- Regulatory and supervisory authorities, including the FSCA;
- The FIC, the South African Revenue Service and other authorities where required by law; and
- Other parties where disclosure is necessary to provide our services or to 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 authorised 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. Where an operator processes personal information on our behalf, we conclude a written agreement requiring it to establish and maintain the security measures required by POPIA.

8. 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, counter-proliferation financing and related compliance purposes.

Where required by law, we may disclose relevant personal information to regulatory authorities, law enforcement agencies or other authorised bodies, including by way of reports to the FIC. We may be prohibited by law from informing you that such a report has been made.

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

9. Communications and Direct Marketing

We may communicate with you, or with your financial adviser on your behalf, regarding:

- Your existing mandate, portfolio and holdings;
- Changes to mandates, fees, model portfolios, or terms and conditions;
- Market commentary, investment updates and newsletters;
- New or amended investment solutions that may be relevant to you; and
- Regulatory, compliance or service-related updates.

You may opt out of receiving marketing communications at any time by notifying If Capital in writing at the contact details set out in this Privacy Statement, or by using the unsubscribe function in the relevant communication. We will give effect to your request as soon as is reasonably practicable.

Please note that you may still receive communications relating to the administration of your existing mandate, portfolio or our legal obligations.

10. Website, Cookies and Electronic Data

Our website may use cookies and similar technologies to enable core functionality, to remember your preferences and to measure how the website is used. You may disable cookies in your browser settings, although certain parts of the website may then not function as intended.

Our website may contain links to third-party websites. We are not responsible for the privacy practices or content of those websites, and we encourage you to review their privacy statements.

11. Record Retention

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

In terms of POPIA, FAIS, FICA and other applicable legislation, certain records must be retained for at least five years from the date of termination of the business relationship or the date of the transaction, or for such longer period as may be required by law.

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

12. Confidentiality and Security

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

We implement appropriate, reasonable technical and organisational safeguards to protect personal information against loss, unauthorised access, misuse, alteration, destruction or disclosure. These measures are aligned with our information security arrangements and the Joint Standard on Cybersecurity and Cyber Resilience.

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

Where we have reasonable grounds to believe that your personal information has been accessed or acquired by an unauthorised person, we will notify you and the Information Regulator as required by POPIA.

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

13. Cross-Border Transfers

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

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

Where personal information is transferred outside South Africa, If Capital will take reasonable steps to ensure that appropriate safeguards are in place and that the recipient is subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection, as contemplated in section 72 of POPIA.

14. Your Rights

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

- Access the personal information we hold about you;
- Request the correction or updating of inaccurate, irrelevant or incomplete information;
- Object, on reasonable grounds, to the processing of your personal information;
- Request the deletion, destruction or de-identification of personal information where permissible;
- Withdraw your consent where processing is based on consent, subject to any legal obligation requiring continued processing; 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, 2000 ("PAIA") and our PAIA Manual, which is available on our website or on request.

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

15. Complaints

If you believe that your personal information has been processed contrary to this Privacy Statement or applicable legislation, you are encouraged to contact the If Capital Information Officer 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 17 below.

16. Amendments

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

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

17. Contact Details

Any query, request or complaint relating to this Privacy Statement may be directed to:

If Capital Information Officer	Information Regulator (South Africa)
Frederik Jacobus Van Zyl du Preez Information Officer If Capital (Pty) Ltd Registration No. 2018/530982/07 | FSP 51648 75 Lavender Lane, Somerton Estate, Bloemfontein Tel: 051 – 407 0800 Email: info@ifcapital.co.za Website: www.ifcapital.co.za	JD House 27 Stiemens Street Braamfontein Johannesburg 2001 Tel: 010 023 5200 Email: enquiries@inforegulator.org.za PAIA complaints: PAIAComplaints@inforegulator.org.za POPIA complaints: POPIAComplaints@inforegulator.org.za Website: www.inforegulator.org.za

This Privacy Statement is issued by If Capital (Pty) Ltd, FSP 51648, and forms part of the If Capital policy library as IFC-CMP-003, version 1, September 2026.