

CEG GROUP

CONSOLIDATED PRIVACY POLICY

CAPITAL EFFICIENCY GROUP (“CEG GROUP”) AND ITS GROUP ENTITIES

Prepared in terms of the Protection of Personal Information Act, 4 of 2013 (“POPI Act”)

Read with the Promotion of Access to Information Act, 2 of 2000 (“PAIA”) as applicable

Document control	Details
Document	CEG Group Consolidated Privacy Policy
Primary Legislation	Protection of Personal Information Act, 4 of 2013
Related Legislation	Promotion of Access to Information Act, 2 of 2000 (PAIA) Financial Intelligence Centre Act 38 of 2001 (FICA); Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS); Companies Act 71 of 2008;
Group Information Officer	Wesley Coetzee
Contact Details	info@capef.co.za / 031-536 8213
Website	https://www.capef.co.za/
Version	1.0
Effective date	08/09/2026
Review cycle	At least annually and following material legal, structural or operational changes.
Approved by	Richard McElligott

IMPORTANT NOTE

“CEG Group” is a descriptive collective term used to refer to the affiliated entities listed in Schedule 1. CEG Group is not a separate registered company, juristic person or private body. Each group entity listed in Schedule 1 remains a separate and distinct juristic person/private body and is individually responsible for compliance with the POPI Act and other applicable legislation in respect of records held or controlled by it. This consolidated format is adopted for administrative convenience and does not merge the legal identities or statutory responsibilities of the group entities.

1. PURPOSE AND SCOPE

This Privacy Policy ("Policy") sets out how CEG Group collects, uses, stores, shares, secures and disposes of personal information in compliance with the POPI Act and other applicable South African legislation.

Section 14 of the Constitution of the Republic of South Africa, 1996, affords every person the right to privacy, including protection against the unlawful collection, retention, dissemination and use of their personal information. The POPI Act gives effect to this constitutional right by regulating the manner in which personal information may lawfully be processed.

This Policy is adopted by, and applies to each of those group entities, and references in this Policy to "CEG Group", "we", "us" or "our" should be read as referring to whichever CEG Group entity or division is processing the personal information in question.

This Policy is intended to:

- Give effect to the conditions for the lawful processing of personal information as set out in the POPI Act;
- Inform data subjects (including clients, suppliers, contractors, employees and other stakeholders) of how their personal information is collected and used by the CEG Group;
- Set minimum standards for the processing of personal information across all CEG Group entities; and
- Regulate the manner in which requests relating to personal information are dealt with, and how data subjects may exercise their rights under the POPI Act.

CEG Group are committed to protecting your privacy in accordance with the POPI Act and the Financial Advisory and Intermediary Services Act (FAIS). This policy explains how we process your personal information and will be reviewed periodically and may change from time to time.

2. LEGAL STATUS AND STRUCTURE OF CEG GROUP

- 2.1. CEG Group is a business/grouping description and not a registered company or separate juristic person.
- 2.2. Each entity in Schedule 1 must be treated as the relevant private body for purposes of the POPI Act in relation to records held or controlled by that entity.
- 2.3. Because CEG Group does not itself have separate legal personality, each entity listed in Schedule 1 is individually responsible, as a "responsible party" as defined in the

POPI Act, for the personal information that it collects and processes in the course of its own operations.

3. SCHEDULE 1: CEG GROUP ENTITIES AND RESPECTIVE INFORMATION OFFICERS

All requests for access to information (other than information that is available to the public) must be addressed to the group entity's Information Officer as scheduled below:

Group Entity	Registration Number	Information Officer	FSP Number	Telephone / Email	Registered Address
Capital Efficiency Group (Pty) Ltd	2015/186027/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
CEG Wealth Management (Pty) Ltd	2025/615249/07	Dimitri Di Paolo	FSP No: 55516	031-536 8213 dimitri@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
CEG Accounting (Pty) Ltd	2009/023253/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
CEG Financial Services (Pty) Ltd	2019/288521/07	Wesley Coetzee	FSP No: 50392	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051

					Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
CEG Trust Company (Pty) Ltd	2015/006266/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
Ralcorp (Pty) Ltd	1980/002377/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
CEG Fiduciary Services (Pty) Ltd	2021/926428/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051

CEG Trust Administrators (Pty) Ltd	2024/492604/07	Wesley Coetzee	N/A	031-536 8213 info@capef.co.za	Block 3 100 on Armstrong Avenue, 100 Armstrong Avenue, La Lucia Ridge, Durban, KwaZulu-Natal, 4051
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The list of companies comprising the CEG Group Entities may change from time to time as a result of acquisitions, disposals or internal restructuring. The current list of CEG Group entities is available on request from the Information Officer identified in Schedule 1 above.

4. DEFINITIONS

Term	Meaning
CEG Group Entities	The CEG Group and its group entities listed in Schedule 1.
Information Officer	The person responsible for statutory information-access and information-governance functions applicable to the entity.
Requester	A person requesting access to a record under PAIA.
Record	A record as defined in PAIA, subject to statutory exclusions.
Personal information	Personal information as defined in the POPI Act.
Third party	A person or entity other than the requester and the relevant private body, as applicable.
Data Subject	The person to whom personal information relates.
Operator	A person who processes personal information for a responsible party in terms

	of a contract or mandate, without coming under the direct authority of that party.
Processing	Any operation or activity concerning personal information, whether or not by automatic means, including collection, receipt, recording, organisation, collation, storage, updating, retrieval, alteration, use, dissemination, merging, linking, restriction, degradation, erasure or destruction of information.
Responsible Party	A public or private body, or any other person, which alone or in conjunction with others, determines the purpose of and means for processing personal information.

5. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICERS

Each CEG Group entity is required to designate an Information Officer (and may designate one or more Deputy Information Officers) who is responsible for encouraging compliance with the conditions for lawful processing of personal information, dealing with requests made to that company in terms of the POPI Act, and co-operating with the Information Regulator.

Contact details for the Information Officer and/or the applicable Deputy Information Officer for a specific CEG Group entity are contained in Schedule 1.

Data subjects who wish to submit a request, objection or complaint relating to the processing of their personal information by a CEG Group entity should direct such correspondence to the Information Officer of that specific entity.

6. APPLICATION OF POLICY

This Policy applies to all personal information processed by any CEG group entity, in any format (electronic, paper-based or otherwise), including personal information relating to:

- clients and prospective clients (natural and juristic persons);
- suppliers, dealers, contractors and other business partners;
- employees, directors, job applicants and former employees; and
- any other individual whose personal information is collected or processed by a CEG group entity in the ordinary course of business.

This Policy applies to all employees, directors, contractors and third parties who process personal information on behalf of any CEG group entity, and to all systems, records and processes used to store or process such information.

7. LEGISLATION AND REGULATORY FRAMEWORK

This Policy must be read with all applicable South African legislation and regulatory requirements, including:

- Constitution of the Republic of South Africa, 1996;
- Promotion of Access to Information Act, 2 of 2000 (PAIA), as amended;
- Protection of Personal Information Act, 4 of 2013 (POPIA), as amended;
- Companies Act, 71 of 2008;
- Financial Intelligence Centre Act, 38 of 2001 (FICA);
- Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS);
- Income Tax Act, 58 of 1962;
- Employment Equity Act, 55 of 1998;
- Basic Conditions of Employment Act, 75 of 1997;
- Labour Relations Act, 66 of 1995;
- Occupational Health and Safety Act, 85 of 1993;
- Electronic Communications and Transactions Act, 25 of 2002;
- Consumer Protection Act, 68 of 2008;
- Collective Investment Schemes Control Act (Act 45 of 2002) (CISCA);

8. PERSONAL INFORMATION WE COLLECT

CEG Group collect personal information directly from you, necessary for the processing and rendering of professional services, which may include but is not limited to:-

- Your full names;
- Identity or passport numbers;
- E-mail, physical and postal addresses and contact information;
- Your employment history and occupation;
- Your medical and health information;
- Your Education; and
- Your gender, race, marital status, language, disabilities

CEG Group will only collect information which is necessary for our legitimate business interests or required in terms of the law.

This information may be collected when you purchase a product through us, request assistance with a service, fill in a form (paper or electronic), when you contact us and provide the information directly.

9. PROCESSING YOUR PERSONAL INFORMATION

Your personal information may only be processed by us for the purpose for which it was provided.

This will include: -

- When you browse our CEG Group website
- When you require our professional services
- Fulfilment of our contractual and legal obligations to you
- To maintain our relationship with you
- To market products, services, or other offerings
- To conduct verification and reference checks where required
- For audit and record keeping purposes
- To conduct statistical or market related research
- As required by legislation, regulation, or industry codes

10. SHARING YOUR PERSONAL INFORMATION

A CEG Group entity will only share your information with approved third-party providers, where necessary for the purpose agreed to by yourself, including but not limited to:-

- Financial institutions;
- Product suppliers and insurers;
- Compliance officers, auditors, and regulatory bodies (e.g., FSCA, Prudential Authority);
- IT service providers managing our data;
- or to government;
- or law enforcement agencies where the law requires that we disclose it.

11. INFORMATION SECURITY SAFEGUARDS

CEG Group makes use of reputable service providers to ensure that care is taken to protect your information and also that we can restore the data should there be a technical problem.

Each CEG Group entity implements appropriate technical and organisational measures to protect the confidentiality, integrity and availability of personal information under its control, and to prevent its loss, unauthorised access, interference, modification or destruction.

These measures include, but are not limited to:

- firewalls, anti-virus and anti-malware protections, kept up to date;
- logical and physical access controls, restricting access to personal information to authorised personnel on a need-to-know basis;
- secure configuration of the hardware and software comprising the IT infrastructure;
- contractual security obligations imposed on operators and other third parties who process personal information on behalf of a CEG Group entity; and
- ongoing review of security measures to address emerging risks.

In the event of a security compromise where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by an unauthorised person, the relevant CEG Group entity will notify the Information Regulator and the affected data subject(s) as soon as reasonably possible, in accordance with section 22 of the POPI Act.

Client information is kept electronically on our cloud-based server which is monitored and maintained by our IT Team.

12. CROSS-BORDER TRANSFERS OF PERSONAL INFORMATION

Client information may be transferred to recipients outside South Africa where necessary to provide the services requested by you or for other lawful purposes, provided the transfer is permitted under section 72 of the POPI Act.

In accordance with section 72 of the POPI Act, personal information may be transferred to a foreign recipient where, among other applicable grounds:

- the recipient is subject to a law, binding corporate rules or binding agreement providing an adequate level of protection;
- you have consented to the transfer;
- the transfer is necessary for the performance of a contract with you or for pre-contractual measures taken at your request; or
- the transfer is otherwise permitted under section 72.

Where required by the POPI Act, CEG Group will take reasonable steps to ensure that appropriate safeguards are in place for cross-border transfers. We may use service providers located outside South Africa, including providers using international cloud-based infrastructure, where the applicable requirements of section 72 are satisfied.

13. COMMUNICATING WITH YOU

When we communicate with you, we will do this by electronic mail wherever possible, and where this is not possible, using the South African postal service.

We will take reasonable measures to ensure the security of the documents sent to you, however, CEG Group cannot be held liable for any unauthorised access or disclosure of your information once it has been sent.

14. RETAINING AND RECORDING YOUR INFORMATION

You acknowledge that your information will be stored by CEG Group. We will only process and retain your information for as long as the purpose for which we collected it continues to be relevant, or we are required to comply with legal or regulatory requirements or to protect our legal interests. This may mean that your information is retained for longer than the minimum time set out by the applicable law.

Once personal information is no longer required, it will be deleted, destroyed or de-identified in a manner that prevents its reconstruction in an intelligible form.

15. RIGHTS OF DATA SUBJECTS

Subject to the POPI Act, a data subject has the right to:

- be notified that personal information about them is being collected;
- be notified in the event that their personal information has been accessed or acquired by an unauthorised person;
- establish whether a CEG Group entity holds personal information about them, and to request access to that personal information;
- request the correction, destruction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully;
- object, on reasonable grounds, to the processing of their personal information;
- object to the processing of their personal information for purposes of direct marketing, and to unsolicited electronic communications;
- not be subject solely to automated decision-making, including profiling, which produces legal or similarly significant effects, save in the limited circumstances permitted by the POPI Act;
- withdraw consent, where processing is based on consent, at any time; provided that it does not affect the processing of your personal information: -
 - Prior to the withdrawal of consent
 - If that processing is an obligation imposed by any law
 - As required to finalise the performance of a contract in which you are a party
 - As required to protect yours, ours or a third party's legitimate interest
- submit a complaint to a CEG Group entity's Information Officer, or to the Information Regulator, regarding the alleged interference with the protection of their personal information.

A data subject who wishes to exercise any of these rights may do so by contacting the Information Officer of the relevant CEG Group entity using the details in Schedule 1 above. Reasonable assistance will be provided, free of charge, to a data subject who wishes to exercise any of these rights.

In accordance with the POPI Act and the 2025 amendments to the Regulations relating to the Protection of Personal Information, CEG Group provide data subjects with accessible and free mechanisms through which they may exercise their rights in relation to their personal information.

Requests may be made using forms substantially similar to the POPI Act Form 1 (Objection to the Processing of Personal Information) and the POPI Act Form 2 (Request for Correction or Deletion of Personal Information), as applicable. The 2025 amended POPI Act Regulations reinforce the requirement for these mechanisms to be accessible and available without charge. The POPI Act Forms 1 and 2 are available from the Information Regulator's website and may also be obtained from our respective group entity's Information Officer on request.

A data subject has the right to submit a complaint to the Information Regulator, Adv. Pansy Tlakula at POPIAComplaints@infoeregulator.org.za, PAIACompliants@infoeregulator.org.za and enquiries@infoeregulator.org.za regarding an alleged interference with the protection of your personal information. A data subject has the right to institute civil proceedings regarding an alleged interference with the protection of your personal information processed in accordance with this policy.

16. REVIEW AND AMENDMENT OF THIS POLICY

This Policy may be reviewed and updated from time to time to reflect changes in applicable legislation, the operations of the CEG Group, or industry best practice. The current version of this Policy will be made available to data subjects on request from the relevant CEG Group entity and published on the CEG Group website.

This Policy does not purport to be exhaustive of, or to comprehensively deal with, every provision of the POPI Act. Data subjects are encouraged to familiarise themselves with the provisions of the POPI Act before submitting a request to a CEG Group entity.

17. OUR CONTACT INFORMATION

If you have any questions or concerns with regards to this Privacy Policy, please contact our Information Officer, Wesley Coetzee on 031-536 8213 / info@capef.co.za

18. APPROVAL

This Policy has been approved for application across the CEG Group as follows:

Approved by: Richard McElligott

Designation: Group CEO

Date: 09 September 2026

Signature: 