



# **Website Privacy Policy**

Last modified: August 20, 2021 Retina Group respects your concerns about privacy. This Website Privacy Policy applies to personal information we obtain about individuals on [www.retinagroup.co.za](http://www.retinagroup.co.za) and any other Retina Group-owned websites or online services that link to this Privacy Policy (collectively, the "Site"). In this Website Privacy Policy, we describe the types of personal information on our Site, how we may use the information, with whom we may share it and the choices available to you. We also describe the measures we take to safeguard the information and tell you how to contact us about our privacy practices.

## Who We Are

The term "Retina Group" (or "we", "us", or "our") in this Website Privacy Policy refers to Retina Group (Pty) Ltd. and its affiliates and subsidiaries.

## Scope of this Website Privacy Policy

Before reviewing our Website Privacy Policy, please consider the following:

- Unless indicated otherwise, this Website Privacy Policy applies only to information collected in connection with your use of public sections of our Site. If you are permitted access to private areas of the Site, the terms of the investor privacy notice included in the subscription package provided to you will control our use of information we collect.
- In addition to this Website Privacy Policy, different privacy notices may apply to you depending on your location or relationship with Retina Group.
- If you are an investor in a fund or other investment vehicle managed or advised by Retina Group, please also refer to the following privacy notices, as appropriate:
  - We recognize the importance of protecting children's online privacy. The Site is intended for a general audience and is not directed to children. We do not knowingly collect personal information online from children under the age of 13.
  - This Website Privacy Policy and all other Retina Group privacy notices do not apply to Retina Group Portfolio Companies. The privacy practices of these Portfolio Companies, including details on the information they may collect about you when you interact with them, are subject to their own privacy policies or notices, which we strongly suggest you review.

## Information We Collect

You may choose to provide us with your personal information when you visit the Site, such as when you send us your name and contact information in connection with an inquiry. In addition, when you use our Site, we may (ourselves or through a third-party vendor) automatically gather information about your devices and your usage of the Site, such as your IP address, identifiers associated with your device, browser and device characteristics, website preferences, information regarding websites accessed immediately before and after your visit to the Site, the date and time of your visit to the Site, and information about how you navigate our Site. Retina Group collects this information by using cookies, web pixels and other similar automated technologies (collectively, "Tools"). We use this information to better understand, customize and improve the user experience with our Site and our other products and services. For example, we may use third-party web analytics services, such as Google Analytics, which leverage Tools to help us understand how visitors engage with and navigate our Site. For more information about the Tools we use on the Site and your choices, please see our Cookie Policy.

## How We Use the Information We Collect

Before reviewing our Website Privacy Policy, please consider the following:

- Provide our Site or our other products and services;
- Communicate with you;

- Establish and manage our business relationships;
- Personalize your experience with us, including on our Website;
- Perform analytics (including market research, trend analysis, financial analysis, and anonymization of personal information);
- Operate, evaluate, develop, manage and improve our business (including operating, administering, analyzing and improving our Site, products and services; developing new products and services; managing and evaluating the effectiveness of our communications; and performing other internal functions);
- Maintain and enhance the safety and security of our Site and other properties, and prevent misuse;
- Protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
- Comply with and enforce applicable legal requirements, relevant industry standards and policies.
- We also may use the personal information we collect about you in other ways for which we provide specific notice at the time of collection and obtain your consent if required by applicable law.

## **How We Share the Information We Collect**

We may share your personal information with Retina Group and its affiliates for the purposes described in this Policy. We also may share personal information with service providers who perform services on our behalf, such as payment service providers, analytics providers, and hosting providers. In accordance with applicable law, we do not authorize these service providers to retain, use or disclose the personal information except as necessary to perform services on our behalf or comply with legal requirements. In addition, we may disclose personal information about you

- (i) if we are required or permitted to do so by law or legal process, for example due to a court order or a request from a law enforcement agency,
- (ii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss,
- (iii) in connection with an investigation of suspected or actual fraudulent or other illegal activity, and
- (iv) in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation).

## **Links to Third-Party Websites**

The Site may contain links to other websites. These third-party websites operate independently of us. The privacy practices of these third parties, including details on the information they may collect about you, are subject to their own privacy policies or notices, which we strongly suggest you review. To the extent any linked websites are not owned or controlled by Retina Group, we are not responsible for these third parties' information practices.

## **How We Protect the Information We Collect**

Retina Group maintains technical and organizational measures designed to protect personal information against loss or accidental, unlawful or unauthorized destruction, alteration, access, disclosure and use.

## **How Long We Keep the Information We Collect**

The time period for which we keep personal information depends on the purposes for which we collected it. We keep personal information for as long as necessary to fulfil those purposes. We will then delete this personal information unless we are required to preserve your personal data in connection with litigation, investigations and proceedings, or if a longer retention period is required or permitted by applicable law or statute of limitations periods.

### **How to Contact Us About Privacy Matters**

If you would like to contact us for any reason concerning our privacy practices, please email us at [privacy@retinagroup.co.za](mailto:privacy@retinagroup.co.za).

### **Updates to this Privacy Policy**

This Privacy Policy may be updated periodically and to reflect changes in our personal information practices. We will indicate at the top of the Privacy Policy when it was most recently updated.