



PIM
CAPITAL

PIM GROUP
PRIVACY STATEMENT

07 September 2022



Introduction

This Privacy Statement is applicable to the following legal entities within the PIM Group (hereinafter referred to as "PIM"):

PIM Capital Management;
PIM Capital Ltd PCC;
PIM Capital Specialist PCC;
Prime Investments ICC Limited; and

any entity to be established or acquired and which would adhere to this Privacy Statement, as may be amended from time to time.

To perform our contractual obligations, PIM collects, processes and stores personal data relating to you, including but not limited to, sensitive personal data. PIM treats personal data collected and processed in accordance with its client onboarding process as part of provision of our services as private and confidential and is committed to meeting its data protection obligations under the Data Protection Act 2017 and where relevant, the General Data Protection Regulations (EU) (together the "Data Protection Laws"). PIM has implemented organisational, physical and technical safeguards which are designed to protect your personal information from unauthorised access, use or disclosure.

We ask that you read this Privacy Statement carefully as it contains important information on how and why we collect, store, use and share your personal information, your rights in relation to your personal information and on how to contact us and the supervisory authorities in the event you have a complaint about the way your personal data is being collected or processed.

Collection

PIM collects personal data directly from you, and where lawful and reasonable, may collect personal information about you from third parties and publicly available sources, such as investment advisors, internet websites, Anti-Money Laundering screening software for the purposes set out below.

PIM may use your personal data to:

- meet our responsibilities towards you;
- follow your instructions;
- process your personal data for ordinary business purposes (this includes to give effect to transactions, administer claims where applicable, manage risks and maintain our overall relationship with you);
- carry out statistical and other analysis to identify potential markets and trends, evaluate and improve our business (this includes improving existing and developing new products and services);
- make sure our business suits your needs; and



- comply with applicable laws.

Without your personal data, we may not be able to provide or continue to provide you with the products or services that you need.

Your Consent

You are entirely free to decide whether or not to provide us with your personal data and there are no consequences should you refuse to do so, **except for when the supply of specific personal data is mandatory by law.**

PIM shall process your personal data if you give us your express consent willingly or in accordance with the law. PIM's clients who have signed the PIM's Application Forms also give us their consent.

We may only disclose your personal data if:

- the law requires it or such personal data is exempted from Data Protection Laws;
- such disclosure is for the administration of justice or in the public interest or relates to the use of a unique identification number to facilitate sharing information and avoid multiple registrations among public section agencies;
- such disclosure is necessary for the performance of a contract to which you are a party or to enable you to enter into a contract; or
- such disclosure is required to protect your vital interests;
- you agreed that we may disclose your data for the purpose for which such data has been collected and of which you have been informed.

Third Parties

We routinely share your personal data internally and with third parties if access to the data is necessary for performance of our services in accordance with any established agreements. We may share your personal data with the regulatory authorities, if required. We will not share your personal information with any other third party except with your prior written consent. We may ask third party service providers to agree to our privacy policies if they need access to any personal data to carry out their services.

We will not disclose your personal data to external organisations that are not our service providers, unless you give us your consent, or unless required by law, or if it is necessary for the conclusion or performance of our services in accordance with any established agreements.

Transfer of Personal Information out of Mauritius/ across borders

PIM may need to transfer your personal information out of Mauritius and process your personal data in other countries either to carry out your instructions or for ordinary business purposes. These



countries may not have the same level of data protection. We shall only transfer the personal data to another country where we have through contractual arrangements requested that there are appropriate safeguards with respect to the protection of the personal data and the party to whom we transfer your personal data agrees to our privacy principles, associated policies and practices and if the transfer is necessary.

Storing of Personal Data

We store personal data as required by law.

Our Security Practices

Our security systems and technical and organisation measures are designed to prevent loss (including accidental loss), alteration of, unauthorised destruction, damage and/or unlawful access, disclosure of your personal data or the processing of personal data from unauthorised third parties.

Access to your Personal Data and your Other Rights

As our client, you may:

- ask us to give you a description of your personal information that we hold;
- ask us to correct or update your personal information through our client service channels;
- ask us to restrict the processing of or erase your personal data; or
- object to the processing of your personal data for a specific purpose.

We will take note of your rights under the applicable Data Protection Laws.

You have the rights to query a decision that we make about the services that we provide to you and that you have requested.

During your contractual relationship with us, if you would like further information on the way in which PIM collects, processes, and protects personal information or would like to access and correct your personal information, please contact PIM's Data Protection Officer at the address set out below.

Monitoring of Electronic Communications

We communicate with you through different methods and channels. If allowed by law, we may record and monitor electronic communications to make sure that they comply with our legal and regulatory responsibilities and internal policies.



Retention of Personal Data

We retain personal data as per the statutory and regulatory requirements.

Right to change this Privacy Statement

We may change this Privacy Statement. We will communicate all changes on our website. The latest version of our Privacy Statement will replace all earlier versions, unless it says differently.

Queries, Complaints and Breaches

If you have any queries or complaints about privacy or believe that there has been a breach with respect to your privacy, please contact the designated Data Protection Office at the address set out below:

Mr. Stephan Hartzenberg
Data Protection Officer
PIM Capital Management
F14, Palm Square Building, La Mivoie, Tamarin, Mauritius
Telephone Number: +230 460 8538
Email address: shartzenberg@pimcapital.mu

The Data Protection Act 2017 also gives you the right to lodge a complaint directly with the Data Protection Commissioner, but we invite you to contact us first to see if we can assist you with any queries or concerns that you may have about our use of your personal data.