



SaltLight Capital Management
Workshop17, Hyde Park Corner, 1st Floor,
North Tower Square, Cnr Jan Smuts Avenue and
Winnie Mandela Drive, Hyde Park,
Johannesburg, 2196
Telephone: (011) 268-6057
Website: www.saltlightcapital.com

SaltLight Capital Management (Pty) Ltd

Privacy and Access to Information Policy

Protection of Personal Information Act, 4 of 2013 (PoPIA) and Promotion of Access to Information Act, 2 of 2000 (PAIA). Registration number 2016/420527/07. FSP 48286.

Item	Detail
Version	3.0, October 2026
Replaces	Version 2.0 (June 2022) and the Policy Statement and Manual of May 2019
Information Officer	David Eborall, Director and Key Individual. Information Regulator registration number 2026-070745, registered 30 October 2026
Approved	David Eborall, Information Officer, 30 October 2026
Review	Annually, and on any material change. Next review October 2027

1. What this policy covers

SaltLight is a discretionary investment manager authorised by the FSCA. It manages investment portfolios under written mandate and renders no financial advice. This policy explains what personal information we hold, why, how we protect it, how long we keep it, and how anyone can see or correct what we hold about them. Part 10 is our manual under section 51 of PAIA.

2. Information Officer

David Eborall is the Information Officer as head of the Company, registered with the Information Regulator on 30 October 2026 under number 2026-070745. Our external compliance officer, Askari Compliance Services, helps him monitor compliance but is not the Information Officer. Contact details are in Part 12.

3. What we collect and why

Who	What we hold	Why, and the lawful basis
Direct clients	Name, ID number, contact details, tax and banking details where needed, FICA declarations, mandate, instructions and correspondence	To perform the mandate (contract) and to meet FICA, FAIS and tax obligations (law)
Advisers, service providers and counterparties	Business contact details and correspondence	To run the business (legitimate interest)
Investor letter subscribers	Email address and, if given, name, company, country, how they heard of us and whether they are an investor	To send the letters they asked for (consent)
Website visitors	Cookie data, see Part 7	To run the site and understand how it is used (legitimate interest)



Who	What we hold	Why, and the lawful basis
Directors, staff and representatives	Information needed for payroll, tax, insurance and the FAIS fit and proper and representative registers	Employment or appointment contract, and law

We do not collect special personal information or information about children, and we collect nothing we do not need. Investors in the funds we manage are clients of the fund manager and the investment platforms, which hold their information as responsible parties in their own right. We do not receive investor level information from them.

4. Who we share it with

We do not sell personal information. We share it only where needed for the purposes above, where the law requires it, or with consent:

- our operators: cloud storage, email, accounting and email marketing providers, and our compliance officer;
- fund managers, platforms and brokers, to give effect to a client's instruction;
- regulators and authorities with a legal right to it, including the FSCA, the Financial Intelligence Centre, SARS, the FAIS Ombud and the Information Regulator; and
- our auditors, insurers and lawyers, under a duty of confidence.

Each operator is bound by written terms to keep the information confidential and secure and to tell us of any breach. The Information Officer reviews those terms when a provider is taken on and at each annual review. Our cloud providers store data outside South Africa. We rely on their data processing terms, which give protection substantially similar to PoPIA, as section 72 requires.

5. How we protect it

- No paper records. Documents are scanned on receipt and held in encrypted cloud storage with version history and a separate backup. We run no servers of our own.
- Every account is protected by multi factor authentication, and remote access is through a zero trust network client.
- Access is limited to the Information Officer, and to anyone else only for a specific task and only while it lasts.
- Client information is sent only from our business email, by secure link or password protected file where practicable.
- We test that our records can be restored at least once a year, and review these safeguards annually.

6. Data breaches

If we believe personal information has been accessed or acquired by someone unauthorised, the Information Officer will contain it, record it in the breach register, and notify the Information Regulator and the people affected as soon as reasonably possible, as section 22 of PoPIA requires. The notice will explain what happened, what we have done and what they can do to protect themselves. We also tell our compliance officer and, where relevant, the FSCA and our insurer.



7. Our website, investor letters and cookies

People subscribe to our investor letters by choosing to on our website sign-up form. Every letter has an unsubscribe link, and we act on it at once. Our email platform keeps a record of each subscription and unsubscribe. We do not send unsolicited marketing.

Our website uses cookies, as explained in the Cookie Policy published on the website. Essential and Google Analytics cookies are set automatically; visitors can switch analytics off at any time under Cookie settings.

8. How long we keep it

Record	Kept for at least
Client mandates, FICA records, transactions and client communications	5 years after the relationship or transaction ends (FICA, FAIS)
Accounting records, financial statements, minutes	7 years (Companies Act)
Company registers, MOI and registration documents	Life of the company
Tax and VAT records	5 years from submission
Employee records	3 to 5 years after employment ends (BCEA, UIF)
Investor letter subscriptions	Until the person unsubscribes

Records needed for a complaint, dispute or investigation are kept until it is closed. After that we delete records permanently, or de-identify them, so they cannot be reconstructed.

9. Your rights

You may ask us what personal information we hold about you and who has seen it, ask us to correct or delete it, object to our use of it, withdraw consent, or unsubscribe at any time. Email the Information Officer. We will check your identity, respond within 30 days, and confirm free of charge whether we hold information about you. If you are unhappy with our response you may complain to the Information Regulator.

10. Access to information (PAIA section 51 manual)

- Requests: on Form 2 of the PAIA Regulations, 2021, to the Information Officer, stating the record wanted and the right it is needed to protect.
- Records we hold: company and statutory records; financial and tax records; client mandates and FICA records; portfolio, trading and broker records; compliance records, policies and registers; personnel records; supplier agreements.
- Available without a request, on our website: this policy, our Cookie Policy, Conflict of Interest Policy, Complaints Policy and Disclosure Document.
- Fees: as prescribed in the Regulations. No request fee for a person asking for his or her own personal information.
- Decision: within 30 days, extendable once by up to 30 days. Refusals give reasons under Chapter 4 of Part 3 of PAIA, such as protecting third parties' personal or confidential information.
- Complaints: to the Information Regulator on Form 5 within 180 days, or to court.



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- The Regulator's guide on how to use PAIA is free from the Regulator and at www.inforegulator.org.za.

11. Training and review

The Information Officer completes a PoPIA awareness activity each year. Anyone joining the Company reads and acknowledges this policy. Compliance is checked in our monthly compliance monitoring, and this policy is reviewed every year.

12. Contact details

Contact	Details
Information Officer	David Eborall 011 268 6057 admin@saltlightcapital.com
Company	Workshop17, Hyde Park Corner, 1st Floor, North Tower Square Cnr Jan Smuts Avenue and Winnie Mandela Drive, Hyde Park, Johannesburg, 2196 www.saltlightcapital.com
Compliance officer	Warren Neale, Askari Compliance Services CC 082 923 6260 warrenn@askaricompliance.com
Information Regulator	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191 010 023 5200 toll free 0800 017 160 enquiries@inforegulator.org.za www.inforegulator.org.za