

PIM Capital Group

Global Presence | Local Expertise



PIM

CAPITAL



# Group **Privacy Policy**

Updated February 2026



## PIM Capital Group | Privacy Policy

### Introduction

This **Privacy Policy** applies to all legal entities within the **PIM Capital Group** (“the **Group**”), including:

- **Mauritius:** PIM Capital Fund Administrators, PIM Capital Fund Services, PIM Capital Specialist PCC, PIM Capital Ltd PCC
- **Guernsey:** PIM Capital (Guernsey) Limited, Prime Investments ICC Limited
- **South Africa:** PIM Capital Fund Services SA (Pty) Ltd (PCFSSA)
- **Botswana:** Prime Collective Investments (Pty) Ltd
- Any entity to be established or acquired and which would adhere to this Privacy Statement, as may be amended from time to time.

The **Group** is committed to protecting personal information in accordance with applicable data protection laws in each jurisdiction where we operate, including:

- **The Mauritius Data Protection Act, 2017**
- **The Data Protection (Bailiwick of Guernsey) Law, 2017**, which incorporates **GDPR principles** and is recognised by the **EU** as providing adequate protection
- **The Botswana Data Protection Act, 2018**
- **The Protection of Personal Information Act (POPIA), 2013** and **Promotion of Access to Information Act (PAIA), 2000 (South Africa)**

Where relevant, the Group may also draw on internationally recognised standards, such as the **EU General Data Protection Regulation (GDPR)**, as **guiding principles** to strengthen its approach to data protection, without creating obligations beyond those required by law.

To perform our contractual obligations, the Group **collects, processes, and stores personal data** relating to you, including but not limited to sensitive personal data. Personal data collected and processed in accordance with our client onboarding process is **treated as private and confidential**. We have implemented **organisational, physical, and technical safeguards** designed to **protect personal information** from unauthorised access, use, or disclosure.

We ask that you read this **Privacy Policy** 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 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 of Personal Data

We may collect personal data directly from you, or where lawful and reasonable, from third parties and publicly available sources such as:

- **Identification details** (name, ID, passport, contact information)
- **Financial information and regulatory documentation** (e.g., for AML/KYC, FATCA, CRS)
- **Website usage data** (cookies, analytics, IP addresses)
- **Information from investment advisors, screening tools, or regulatory databases**

## Use of Personal Data

- Provide and manage financial and fund administration services
- Meet legal and regulatory obligations (e.g., **FATCA, CRS, AML/KYC, NBFIRA, FSC, GFSC, FSCA, POPIA**)
- Process transactions and administer claims
- Communicate with you and respond to enquiries
- Conduct statistical and business analysis to improve services
- Ensure compliance with jurisdiction-specific laws and regulations

**In certain circumstances, failure to provide required personal data may prevent us from providing or continuing to provide services.**

## Sharing of Personal Data

Personal data may be shared within the Group, with regulators, supervisory authorities, and trusted third-party providers under confidentiality obligations. We do not sell or disclose data to unaffiliated third parties without consent, unless required by law.

We will not share your personal data with any other third party except with your prior written consent, or as required by law, or where necessary for the conclusion or performance of services. Third-party service providers engaged by the Group may be required to comply with our privacy standards before being granted access to personal data

## Cross-Border Transfers

The Group may transfer and process personal data across borders, including between **Mauritius, Guernsey, Botswana, South Africa**, and other jurisdictions, to carry out instructions, support business operations, or meet regulatory obligations.

Such transfers will only occur where adequate protection measures are in place, including:

- **Guernsey:** Supported by the **EU's** recognition of the **Bailiwick of Guernsey** as providing adequate protection under **GDPR**.
- **Mauritius & Botswana:** Transfers subject to contractual safeguards and informed by **international best practice**.
- **South Africa:** Transfers aligned with **POPIA** requirements

We will only transfer personal data internationally where the recipient agrees to uphold our privacy principles, associated policies, and practices, and where appropriate safeguards are in place to ensure compliance with applicable data protection laws.



## Data Retention

We retain personal data as required by law and regulatory obligations in each jurisdiction, and only for as long as necessary for the purposes set out in this policy.

## 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 where the supply of specific personal data is mandatory by law.

The Group shall process your personal data if you give us your express consent willingly or in accordance with applicable data protection laws. Clients who sign the Group's application forms are deemed to have provided such consent.

### **We may only disclose your personal data if:**

- The law requires it or such personal data is exempted from data protection laws;
- 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-sector agencies;
- Disclosure is necessary for the performance of a contract to which you are a party or to enable you to enter into a contract;
- Disclosure is required to protect your vital interests; or
- You have agreed that we may disclose your data for the purpose for which it was collected and about which you have been informed.

## Your Rights

### **Depending on your jurisdiction, you may have rights to:**

- Access and obtain a copy of your personal data
- Correct or update your information
- Request erasure ("right to be forgotten")
- Restrict or object to processing
- Data portability (where applicable)
- Withdraw consent at any time
- Lodge a complaint with your local Data Protection Authority



## Updates to this Policy

We may update this Privacy Policy periodically to reflect changes in law, regulation, or business practice. The effective date at the top indicates the latest version. Updates will be published on our websites.

## Queries, Complaints and Breaches

Where required by law, we will notify affected individuals and regulators of reportable data 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 Officer / Information Officer** for your jurisdiction.

### Mauritius

**Miss Yajna Basant Rai, Data Protection Officer, PIM Capital Fund Services**

**Registered Address:** Office 1, Ground Floor, Ebene House, 33 Hotel Avenue, Cybercity 72201, Ebene, Mauritius

**Telephone Number:** +230 490 1402

**Email address:** ybasantrai@pimcapitalgroup.com

### Guernsey

**Stephan Hartzenberg, Data Protection Officer, PIM Capital (Guernsey) Ltd**

**Registered Address:** Suite 02-02, Mill Place, Rue Du Pré, St Peter Port, GY1 1LT, Guernsey

**Telephone Number:** (+44) 2045 712 440

**Email address:** stephan@pimcapitalgroup.com

### Botswana

**Miss Aobakwe Kobue, Data Protection Officer**

**Registered Address:** Office 13, 1<sup>st</sup> Floor, The Office, Plot 64517, Gaborone, Botswana

**Telephone Number:** +267 716 73647 / +267 311 5356

**Email address:** akobue@prime.co.bw

### South Africa

**Mr Israel Bhailall, Data Protection Officer**

**Registered Address:** 28 Peter Place, Lyme Park, Sandton, 2100

**Telephone Number:** +27(0)10 594 2100

**Email address:** ibhailall@primeinvestments.africa



## Supervisory Authorities

If you have concerns, you may contact:

### Mauritius: Data Protection Commissioner

- **Address:** 5th Floor, SICOM Tower, Wall Street, Ebene, Republic of Mauritius
- **Telephone:** +230 460 0251
- **Fax:** +230 489 7341
- **Email:** [dpo@govmu.org](mailto:dpo@govmu.org)
- **Website:** <https://dataprotection.govmu.or>

### Guernsey: Office of the Data Protection Authority (ODPA)

- **Address:** Block A, Lefebvre Court, Lefebvre Street, St. Peter Port, Guernsey, GY1 2JP
- **Telephone:** +44 1481 742074
- **Email:** [enquiries@odpa.gg](mailto:enquiries@odpa.gg)
- **Website:** [www.odpa.gg](http://www.odpa.gg)

### Botswana: Information & Data Protection Commission

- **C/O Botswana Communications Regulatory Authority (BOCRA)**
- **Address:** Plot 50671 Independence Avenue, Gaborone, Botswana
- **Telephone:** +267 395 7755
- **Email:** [info@bocra.org.bw](mailto:info@bocra.org.bw)
- **Website:** <https://www.bocra.org.bw>

### South Africa: Information Regulator (POPIA/PAIA)

- **Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- **Tel:** +27 (0)10 023 5200
- **Email:** [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)
- **Website:** [www.justice.gov.za/inforeg/](http://www.justice.gov.za/inforeg/)



We encourage you to contact us first so we may address your concerns.



## Get in Touch

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#### Mauritius

**Ebene:** PIM Capital House, E53  
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**Tamarin:** Lot B3-S05, Black River  
Business Park, 99 Royal Road, La  
Mivoie, Black River, Mauritius



#### Guernsey

**St Peter Port:** Suite 02 02,  
Mill Place, Rue du Pré,  
Guernsey,  
GY1 1LT



#### South Africa

**Johannesburg:** 28 Peter Place, Lyme  
Park, Sandton  
**Cape Town:** 183 Albion Springs  
Corner of Main Road &, Albion  
Springs Cl, Rondebosch



#### Botswana

**Gaborone:** Office 13,  
1st Floor, The Office,  
Fairgrounds,  
Gaborone

Our Regulatory Licensing Overview across Mauritius (FSC), Guernsey (GFSC), South Africa (FSCA), and Botswana (NBFIRA)

PIM Capital Fund Administrators is licensed by the FSC in Mauritius - License No. GB22200251; PIM Capital Fund Services is licensed by the FSC in Mauritius - License No. C114013529; PIM Capital Specialist PCC is licensed by the FSC in Mauritius - License No. C117017356; PIM Capital Ltd PCC is licensed by the FSC In Mauritius - License No. C114013528; PIM Capital (Guernsey) Limited is licensed by the GFSC in Guernsey - License No. 3074614; Prime Investments ICC Limited is authorised by the GFSC in Guernsey - Reference No. CMP68399; PIM Capital Fund Services SA (Pty) Ltd – Reg No. 2024/206328/07 (PCFSSA); Prime Collective Investments (Pty) Ltd is licensed by NBFIRA in Botswana - License No. 00004/RFII