

# PRIVACY STATEMENT

Date of Issue: 1<sup>st</sup> May 2026

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**VUNANI**

FUND MANAGERS

## 1. Introduction

- 1.1. Vunani Fund Managers (Pty) Ltd (“Vunani”, “we”, “us”, or “our”) is committed to protecting the privacy, confidentiality, and security of personal data in accordance with the **Botswana Data Protection Act, 2024** and any other applicable laws.
- 1.2. This Privacy Statement explains how we collect, use, disclose, retain, and safeguard personal data in the course of our business as a fund manager and financial services provider.
- 1.3. This Statement applies to all data subjects, including clients, investors, prospective clients, employees, service providers, and any other persons whose personal data we process.

## 2. What is Personal Data and What Type of Personal Information Do We Collect?

We may collect and process personal data including, but not limited to:

- 2.1. Personal identification details (such as full name, identity number, passport number, nationality, and date of birth)
- 2.2. Contact information (including physical address, postal address, email address, and telephone number)
- 2.3. Financial and investment-related information (including bank details, investment history, transaction data, and source of funds)
- 2.4. Regulatory and compliance information required for **know-your-customer (KYC)**, **anti-money laundering (AML)**, and **counter-terrorism financing (CTF)** obligations
- 2.5. Employment and professional information
- 2.6. Any other personal data required to provide our services or comply with legal obligations

## 3. How Do We Collect your Personal Information?

Personal data may be collected:

- 3.1. Directly from you when you engage with us or complete application or subscription forms
- 3.2. From authorised representatives, intermediaries, or advisors acting on your behalf
- 3.3. From third parties such as administrators, custodians, vendors, affiliates, regulators, or public sources, where permitted by law

## 4. What is the Purpose of Processing

We process personal data for legitimate and lawful purposes, including:

- 4.1. Providing fund management and related financial services
- 4.2. Establishing and managing client and investor relationships
- 4.3. Assessing suitability and conducting due diligence
- 4.4. Complying with legal, regulatory, and supervisory requirements
- 4.5. Preventing fraud, financial crime, and unlawful activities
- 4.6. Communicating with you in relation to investments, regulatory disclosures, and operational matters

## 5. Lawful Basis for Processing

In terms of the Botswana Data Protection Act, personal data is processed on the basis that:

- 5.1. It is necessary for the performance of a contract to which the data subject is a party
- 5.2. Processing is required to comply with a legal or regulatory obligation
- 5.3. Processing is necessary to pursue Vunani's legitimate business interests, provided such interests do not prejudice the rights of the data subject
- 5.4. The data subject has provided consent, where required

## 6. Disclosure of Personal Data

We may disclose personal data to:

- 6.1. Employees and officers of Vunani who require the information to perform their duties
- 6.2. Third-party service providers such as fund administrators, custodians, auditors, and legal or compliance advisors
- 6.3. Regulatory authorities, supervisory bodies, courts, or law enforcement agencies where required by law

All third parties are required to maintain appropriate confidentiality and data protection safeguards.

Vunani does **not** sell personal data to third parties.

## 7. Cross-Border Transfers

Where personal data is transferred outside Botswana, Vunani ensures that such transfers are conducted in accordance with the Data Protection Act and that adequate safeguards are in place to protect the data.

## 8. Data Security

- 8.1. We implement reasonable and appropriate technical and organisational measures to safeguard personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.
- 8.2. While we take all reasonable steps to protect personal data, no system of storage or transmission is completely secure.

## 9. Retention of Personal Data

Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected, or as required by law, regulatory obligations, or contractual requirements. Thereafter, data is securely destroyed or anonymised.

## 10. Rights of Data Subjects

In accordance with the Botswana Data Protection Act, data subjects have the right to:

- 10.1. Request access to personal data held by Vunani
- 10.2. Request correction or deletion of inaccurate, irrelevant, or excessive personal data
- 10.3. Object to the processing of personal data in certain circumstances
- 10.4. Withdraw consent where processing is based on consent

Requests must be made in writing using the contact details below.

#### **11. Updates to this Privacy Statement**

Vunani may amend this Privacy Statement from time to time to reflect changes in law, regulatory requirements, or business practices. The most current version will apply upon publication.

#### **12. Contact Information**

For any questions, requests, or complaints regarding this Privacy Statement or the processing of personal data, please contact:

**Vunani Fund Managers (Pty) Ltd**

Email: [investorinfo@vunanifm.co.bw](mailto:investorinfo@vunanifm.co.bw)

Telephone: +267 391 0311

Physical Address: Plot 64515, Kgwebo 2, 2nd floor, Fairground Office Park, Gaborone, Botswana