



Privacy Statement

NKWE Fund Management (Pty) Ltd (“NKWE”) respects and protects the privacy of its clients, prospective clients, business partners and other stakeholders. This Privacy Statement is guided by the Protection of Personal Information Act, 4 of 2013 (“POPIA”) and sets out the principles applied by NKWE when collecting, using, storing and protecting personal information.

1. Collection of Personal Information

NKWE only collects personal information that is reasonably necessary for legitimate business, financial services, regulatory and compliance purposes. This may include identification and contact details, employment or business information, financial and investment-related information, and other information required to provide services or meet legal and regulatory obligations.

2. Use of Personal Information

Personal information may be processed for client engagement, service delivery, administration, due diligence, regulatory compliance, recordkeeping, communication and other legitimate business purposes. Personal information will not be used for purposes that are incompatible with the reason for which it was originally collected unless permitted by law or supported by the appropriate consent.

3. Disclosure of Personal Information

NKWE may disclose personal information to its Principal FSP, authorised service providers, professional advisers, product or investment-related counterparties, regulators or other parties where disclosure is required for legitimate business purposes or by law. Personal information will not be sold, rented or traded to unrelated third parties for commercial gain.

4. Protection of Personal Information

NKWE applies reasonable organisational, administrative and technical safeguards designed to protect personal information against loss, unauthorised access, alteration, misuse, destruction or unlawful disclosure. Access to personal information is limited to persons who require the information for authorised business purposes.

5. Rights of Data Subjects

Subject to POPIA and other applicable legislation, individuals may request access to their personal information, request correction or deletion where appropriate, object to certain processing activities, withdraw consent where processing is based on consent, and object to direct marketing communications.

6. Changes to this Privacy Statement

NKWE may amend this Privacy Statement when required to reflect legislative, regulatory, operational or technological developments. Updated information may be made available through NKWE’s website.

7. Privacy Enquiries

Questions, requests or concerns regarding NKWE’s processing of personal information may be directed to info@nkwefundmanagement.com. Further information regarding NKWE is available at <https://nkwefm.com/>.

POPIA – NKWE’s Declaration

NKWE is committed to the responsible and lawful processing of personal information in accordance with POPIA. Personal information is collected and processed only where there is an appropriate lawful basis and is safeguarded through reasonable security and confidentiality measures.

NKWE recognises the rights of data subjects to access and, where appropriate, request the correction or deletion of their personal information and to raise concerns regarding its processing.

Requests relating to personal information may be submitted to info@nkwefundmanagement.com or through the contact facilities available at <https://nkwefm.com/>.

Treating Customers Fairly – NKWE’s Declaration

NKWE is committed to treating clients fairly and conducting its activities with integrity, transparency and accountability.

The principles of Treating Customers Fairly (“TCF”) are incorporated into NKWE’s governance, client engagement and financial services processes. NKWE seeks to ensure that clients receive appropriate information, are treated fairly throughout the business relationship and are not exposed to unreasonable barriers when requiring assistance or raising concerns.

NKWE also operates subject to the governance and regulatory oversight requirements applicable to its relationship with its Principal FSP.

NKWE’s full Treating Customers Fairly Policy is available upon request at: info@nkwefundmanagement.com.

Conflict of Interest Policy Statement

NKWE is committed to conducting its business with integrity, objectivity, skill, care and diligence and to acting fairly when providing financial services.

NKWE maintains appropriate arrangements for the identification, avoidance and management of actual, potential and perceived conflicts of interest. Where a conflict cannot reasonably be avoided, appropriate measures are applied to manage, mitigate and disclose the conflict in a manner that protects the interests of clients.

NKWE’s conflict management arrangements also operate within the governance and oversight framework established by its Principal FSP.

The full Conflict of Interest Policy is available upon request from info@nkwefundmanagement.com.

Complaints Policy – NKWE’s Declaration

NKWE is committed to ensuring that complaints are handled fairly, consistently, objectively and without unnecessary delay.

Clients who are dissatisfied with a service, communication, decision or other aspect of their dealings with NKWE are encouraged to submit the matter to info@nkwefundmanagement.com.

Complaints will be acknowledged, investigated and managed in accordance with NKWE’s applicable complaints procedures and, where relevant, the complaints management framework and oversight requirements of its Principal FSP. Complainants will be kept appropriately informed regarding the progress and outcome of their complaint.

Where a complaint falls within the jurisdiction of the Office of the Ombud for Financial Services Providers (FAIS Ombud) and remains unresolved after the applicable internal complaints process has been followed, the complainant may refer the matter to the FAIS Ombud in accordance with the prescribed process.

NKWE's full Complaints Policy is available upon request from info@nkwefundmanagement.com.

Whistleblowing – NKWE's Declaration

NKWE promotes a culture of ethical conduct, transparency and accountability and encourages employees, representatives, service providers and other stakeholders to report suspected misconduct, unethical behaviour, fraud, regulatory breaches or other serious concerns.

Reports made in good faith will be handled with appropriate confidentiality and without tolerance for victimisation or retaliation against persons who raise legitimate concerns.

Whistleblowing concerns may be submitted to info@nkwefundmanagement.com. Where a matter requires escalation, it will be managed in accordance with NKWE's internal governance arrangements and, where applicable, the oversight framework of its Principal FSP.

NKWE's full Whistleblowing Policy is available upon request.