

PRIVACY POLICY

Effective Date: 22nd April 2026

Last Updated: 22nd April 2026

Novac Asset Management Limited ("Novac", "we", "our" or "us") is committed to protecting the privacy, confidentiality and security of personal information entrusted to us.

This Privacy Policy explains how we collect, use, disclose, store and protect information obtained through:

- www.novac.co.zm
- Any future Novac client portal or investment platform
- Email, telephone and written communications
- Enquiry forms, meetings and onboarding documentation
- Any future collective investment schemes, investment products or client relationships

By accessing or using our website, contacting us or providing personal information to us, you acknowledge that you have read and understood this Privacy Policy.

1. Who We Are

Novac Asset Management Limited is a licensed Dealer authorised by the Securities and Exchange Commission of Zambia and operates as an investment management and capital markets firm.

Registered Office: 32 Roan Road Kabulonga Lusaka, Zambia

Email: info@novac.co.zm Website: www.novac.co.zm

2. Information We Collect

We may collect and process the following categories of information:

2.1 Information You Provide Directly

- Full name
- Date of birth
- Nationality
- Physical and postal address
- Telephone number
- Email address

- Employer or company details
- Occupation and source of income
- Copies of identification documents
- Tax identification numbers
- Bank account details
- Investment preferences and financial objectives
- Any information provided through forms, correspondence or meetings

2.2 Sensitive and Regulatory Information

Where required for client onboarding, regulatory compliance or future investment products, we may collect:

- Know Your Customer (KYC) information
- Anti-Money Laundering (AML) information
- Source of funds and source of wealth information
- Politically Exposed Person (PEP) status
- Identification and verification documents
- Beneficial ownership information
- Information relating to sanctions screening

2.3 Information Automatically Collected

When you visit our website or future client portal, we may automatically collect:

- IP address
- Browser type and version
- Device type and operating system
- Website usage and browsing behaviour
- Date and time of access
- Pages viewed and links clicked
- Referring website or search engine
- Cookies and similar technologies

2.4 Information from Third Parties

We may obtain information from:

- Public registers and regulatory databases
- Credit reference or verification agencies
- Professional advisers and intermediaries
- Banks, custodians and service providers
- Third-party technology partners
- Publicly available sources

3. How We Use Your Information

We may use your information for the following purposes:

- To respond to enquiries and requests
- To communicate with prospective and existing clients
- To assess suitability for our products and services
- To provide investment management, advisory and capital markets services
- To administer future collective investment schemes and client accounts
- To establish and maintain a client relationship
- To verify identity and conduct due diligence
- To comply with legal, tax, anti-money laundering and regulatory obligations
- To improve and monitor our website and future client portal
- To detect, investigate and prevent fraud, cybercrime and other unlawful conduct
- To maintain records and internal reporting
- To send updates, newsletters or marketing communications where permitted

4. Legal Basis for Processing

We process personal information only where we have a lawful basis to do so, including:

- Your consent
- The performance of a contract or steps prior to entering into a contract
- Compliance with legal and regulatory obligations
- Our legitimate business interests
- The protection of your interests or the interests of others

5. Disclosure of Information

We do not sell personal information.

We may disclose information:

- To our employees, officers and authorised representatives
- To regulators, law enforcement agencies and governmental authorities
- To banks, trustees, custodians, administrators and professional advisers
- To auditors, legal advisers and compliance consultants
- To trusted technology, hosting and software providers
- To third parties where disclosure is required by law or regulation
- To any successor business or purchaser in the event of a merger or restructuring

All third parties receiving information from us are expected to maintain appropriate confidentiality and security standards.

6. International Transfers

Where information is transferred outside Zambia, including to international technology providers or strategic partners, we will take reasonable steps to ensure that appropriate safeguards and confidentiality protections are in place.

7. Data Security

Novac takes reasonable and appropriate technical, administrative and organisational measures to protect information against loss, misuse, unauthorised access, disclosure, alteration or destruction.

Such measures may include:

- Encryption and secure servers
- Password-protected systems
- Restricted access controls
- Secure backups
- Monitoring and cyber security measures
- Internal confidentiality agreements
- Staff training and information security procedures

Despite these measures, no website, internet transmission or electronic storage system can be guaranteed to be completely secure.

8. Data Retention

We retain personal information only for as long as reasonably necessary for the purposes set out in this Privacy Policy, including:

- For the duration of a client relationship
- For any period required by law or regulation
- For internal audit, legal and record-keeping purposes
- For the resolution of disputes or complaints

Information that is no longer required will be securely deleted, destroyed or anonymised.

9. Cookies and Similar Technologies

Our website may use cookies, analytics tools and similar technologies to:

- Improve functionality and performance
- Remember your preferences
- Analyse traffic and website usage

- Improve security
- Support future client portal features

You may disable cookies through your browser settings, although some parts of the website may not function correctly.

10. Marketing Communications

Where permitted by law, we may send you information regarding:

- Novac services
- Market commentary and investment insights
- Future products and collective investment schemes
- Newsletters and events

You may opt out of marketing communications at any time by following the unsubscribe instructions or contacting us.

11. Your Rights

Subject to applicable law, you may have the right to:

- Request access to your information
- Request correction of inaccurate information
- Request deletion of information where appropriate
- Object to or restrict certain processing
- Withdraw consent
- Request transfer of information to another provider
- Lodge a complaint regarding the handling of your information

Requests should be directed to:

Data Protection Officer Novac Asset Management Limited Email: privacy@novac.co.zm

12. Third-Party Websites

Our website may contain links to external websites or third-party services. Novac is not responsible for the content, security or privacy practices of such websites.

13. Changes to this Policy

We may amend this Privacy Policy from time to time. Any updated version will be published on this website together with the revised effective date.