



Luro Investments (Pty) Ltd

Website Privacy & Cookies Policy

Version 1.2 – Effective date: 13/10/2026

The Protection of Personal Information Act, 2013 (“POPIA”) came into force on 1 July 2020, and compliance became enforceable from 1 July 2021. We have a number of obligations and duties in terms of POPIA that we must comply with. The protection of your personal information is a high priority for us and we have taken steps to ensure that your personal information is protected and remains private.

In addition to this document serving as our privacy policy, this document will also serve as our data subject notification as contemplated in section 18 of POPIA. In this regard, this document will inform you of what personal information we collect, why we collect it, how we use it and what safety measures are in place to protect it.

Where we refer to “process”, it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with your personal information. As a general rule we will only process your personal information if this is required to evaluate, make or manage an investment, provide or receive a service, carry out a transaction, employ personnel or comply with the law.

We may combine your personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.

In this document any reference to “we” or “us” or “our” is reference to Luro Investments (Pty) Ltd, an investment management company that invests in businesses in the health and wellness sector.

This Privacy Policy applies to investors, prospective and existing investee companies and their representatives, suppliers, website users, job applicants and other persons whose personal information we process. We process personal information on the lawful grounds set out below.

We may change this Privacy Policy from time to time if the law or our business practices requires it.

The version of the Privacy Policy displayed on our website at the time of your interaction with us will be applicable.

What is personal information?

Personal information refers to any information that identifies you or specifically relates to you, whether you are a living individual or an existing juristic person such as a company. Personal information includes, but is not limited to, the following information about you:

Age	Financial history	Personal views
Belief	Gender	Physical address
Birth	Identity number	Physical health
Biometric	Language	Pregnancy
Colour	Location information	Race
Conscience	Marital Status	Religion
Correspondence	Mental Health	Sex
Criminal history	Medical History	Sexual orientation

Culture	Name	Social origin
Disability	National Origin	Any identifying number, symbol or other particular assignment
Education	Online identifier	Telephone number
E-mail address		Well being
Employment history	Personal opinions	
Ethnic origin	Personal preferences	

Is the supply of personal information voluntary or mandatory?

The supply of certain personal information is mandatory, meaning we have to collect this personal information from you by law. If you do not supply this information, we cannot comply with our legal obligations. In this regard, if you do not supply this personal information we cannot do business with you. We collect personal information as is required by the following legislation:

Basic Conditions of Employment Act, No 75 of 1997
 Broad-Based Black Economic Empowerment Act, No. 53 of 2003
 Companies Act, No. 71 of 2008
 Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
 Consumer Protection Act, 68 of 2008
 Employment Equity Act, No. 55 of 1998
 Income Tax Act 58 of 1962
 Labour Relations Act, No 66 of 1995
 Skills Development Act 97 of 1998
 Tax Administration Act, No. 28 of 2011
 Unemployment Insurance Act, No. 63 of 2001
 Occupational Health and Safety Act No. 85 of 1993
 Promotion of Access to Information Act, No. 2 of 2000
 Protection of Personal Information Act, No. 4 of 2013
 Value-Added Tax Act, 89 of 1991

In other instances, the supply of personal information is voluntary, which means there is no law imposed on us to collect this personal information. Even though there is no law that imposes the collection of the personal information, we require the personal information to conclude or perform our agreements with you or to consider an investment or engagement. In this regard, if you do not supply the personal information, we may not be able to do business with you.

When will we process your personal information?

We will only process your personal information for lawful purposes relating to our business if the following applies:

- if you have consented thereto.
- if a person legally authorised by you, the law, or a court, has consented thereto.
- if it is necessary to conclude or perform under a contract we have with you.
- if the law requires or permits it.
- if it is required to protect or pursue your, our or a third party's legitimate interest.

What is special personal information?

Special personal information is personal information about the following:

Biometric information	Philosophical beliefs	Trade union membership
Criminal behaviour	Political persuasion	Sex life
Ethnic origin	Race	
Health	Religious beliefs	

When will we process your special personal information?

We may process your special personal information in the following circumstances:

- if you have consented to the processing.
- if the processing is necessary for the establishment, exercise or defence of a right or obligation in law.
- if the processing is for statistical or research purposes and all legal conditions are met.
- if the special personal information has deliberately been made public by you.
- if race or ethnic origin information is processed to comply with laws aimed at protecting or advancing persons disadvantaged by unfair discrimination, such as the Employment Equity Act and B-BBEE legislation (section 29 of POPIA).
- if health information is processed as an employer where necessary to implement employment laws or to support or reintegrate employees in connection with sickness or incapacity (section 32 of POPIA).
- if criminal behaviour information is processed in accordance with law, for example screening for roles of trust, with your consent (section 33 of POPIA).

Other than as described above, we do not intend to collect special personal information. Please do not submit special personal information to us through our website or general enquiry channels.

When and from where we obtain personal information about you?

We may collect personal information about you from the following sources:

- We may collect personal information directly from you.
- We may collect personal information from a public record.
- We may collect personal information from an area where you have deliberately made it public.
- We may collect information about you based on your use of our website and communication channels.
- We may collect information about you based on how you engage or interact with us such as via emails, letters, telephone calls and surveys.
- We may collect personal information from a third party.
- We may collect personal information from another source if you give us consent to do so.

If the law requires us to do so, we will ask for your consent before collecting personal information about you from third parties.

The third parties from whom we may collect your personal information include, but are not limited to, the following:

- Partners of our company for any of the purposes identified in this Privacy Policy.
- investee companies and prospective investee companies, co-investors, and their advisers.
- public registers such as CIPC, and verification and background screening service providers.
- your employer, recruitment agencies and referees (for job applicants).
- attorneys, auditors and other professional advisers.

- payment processing services providers, merchants, banks, and other persons that assist with the processing of your payment instructions, like EFT transaction partners.
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
- regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities.
- our service providers, agents and sub-contractors .
- courts of law or tribunals.

Reasons we need to process your personal information.

We will process your personal information for the following reasons:

- to source, evaluate, conclude and manage investments, including due diligence on investee companies and their key persons.
- to identify and verify investors and counterparties where required by law or good governance.
- to recruit, employ and manage our personnel.
- to market our business and investment opportunities to you, subject to the section on marketing below.
- to respond to your enquiries and complaints.
- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions, and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests.
- for historical, statistical and research purposes.
- to process payments.
- to enable us to deliver goods, documents, or notices to you.
- for security, identity verification and to check the accuracy of your personal information.
- to communicate with you and carry out your instructions and requests.
- for stakeholder satisfaction surveys.
- for any other related purposes that are compatible with the purpose for which the information was collected.

How we use your personal information for marketing

- We will use your personal information to market our business and investment opportunities to you.
- We will do this in person, by post, telephone, or electronic channels such as SMS, email, and fax.
- If you are not our existing client or investor, we will only market to you by electronic communications with your prior consent. If you are an existing client or investor, we will only send you electronic marketing about similar offerings, and only if you were given the opportunity to opt out when we collected your details.
- In all cases you can request us to stop sending marketing communications to you at any time, free of charge. Every electronic marketing message will identify us and include a way to opt out.

When how and with whom we share your personal information?

In general, we will only share your personal information if any one or more of the following apply:

- if you have consented to this.
- if it is necessary to conclude or perform under a contract we have with you;
- if the law requires it; and / or
- if it's necessary to protect or pursue your, our or a third party's legitimate interest.

The categories of recipients with whom we may share your personal information are: our service providers acting as operators (such as IT, cloud hosting, email, payroll, accounting and virtual data room providers) under written agreements; our professional advisers and auditors; banks; co-investors and investee companies (in connection with an investment); regulatory, tax and law enforcement authorities where required by law; and courts or tribunals.

Under what circumstances will we transfer your information to other countries?

We will only transfer your personal information to third parties in another country in any one or more of the following circumstances:

- where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient.
- where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest.
- where you have consented to the transfer; and / or
- where the transfer is for your benefit, and it is not reasonably practical to obtain your consent but, if it were, you would be likely to give it.

This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country or if the other country's laws provide better protection the other country's laws would be agreed to and applied. Our service providers may host information in the United States of America, the European Union and other jurisdictions where global cloud providers operate.

How we secure your personal information

- We will take appropriate and reasonable technical and organisational steps to protect your personal information according to industry best practices. Our security measures (including physical, technological, and procedural safeguards) will be appropriate and reasonable. This includes the following:
- keeping our systems secure (like monitoring access and usage);
- storing our records securely.
- controlling the access to our buildings, systems and/or records; and
- safely destroying or deleting records.
- Ensure compliance with best practice standards.
- requiring our operators, by written agreement, to keep your information confidential and secure and to notify us of any security compromise.
- notifying you and the Information Regulator as soon as reasonably possible if we have reasonable grounds to believe your personal information has been accessed or acquired by an unauthorised person, as required by section 22 of POPIA.

How long do we keep your personal information?

We will keep your personal information only for as long as:

- the law requires us to keep it.
- a contract between you and us requires us to keep it.
- you have consented for us keeping it.
- we are required to keep it to achieve the purposes listed in this Privacy Policy.
- we require it for statistical or research purposes, with appropriate safeguards.
- a code of conduct requires us to keep it; and / or
- we reasonably require it for a lawful purpose related to our functions or activities.

We apply a records retention schedule. As a guide, company and investment records are generally kept for at least 7 years, tax records for at least 5 years and employment records for at least 3 years after the relationship ends, or longer where the law requires. Thereafter the information is securely destroyed, deleted or de-identified.

Children's Privacy

Because we care about the safety and privacy of children online, we do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to our Information Officer.

Using our website

This section explains what personal information we collect when you use www.luroinvestments.com and how we use it. It forms part of this Privacy Policy.

Contact form. If you send us a message through the contact form on our website, we ask for your first name, last name, email address, phone number and message. We use these details only to respond to your enquiry and, where relevant, to take the discussion forward. Your message is sent to us by email and may also be stored on our website platform. We keep enquiries only for as long as we need them to deal with your enquiry and any resulting relationship, and then delete or de-identify them as described in this policy. We will not add you to a marketing list simply because you contacted us; any marketing is subject to the section on marketing above.

Email and LinkedIn. You may also contact us directly at info@luroinvestments.com. Our website links to LinkedIn. If you follow those links, LinkedIn's own privacy policy and cookies apply, and we are not responsible for how LinkedIn handles your information.

Technical information and service providers. Like most websites, ours is hosted and delivered by service providers who process technical information such as your IP address, browser and device type, the pages you visit and the date and time of your visit. Our website is hosted by GoDaddy, and delivered and protected through a content delivery and security network (Cloudflare). Our hosting provider also measures traffic to and the performance of the website using a script that sets the cookies described below. Our website loads its fonts from Google Fonts, which means that your IP address and browser details are sent to Google's servers (which may be outside South Africa) when a page loads. We do not use Google Analytics, advertising pixels or social media tracking tools on our website.

Our cookie policy

A cookie is a small piece of data sent from our websites or applications to your computer or device hard drive or Internet browser where it is saved. The cookie contains information to personalise your experience on our websites or applications and may improve your experience on the websites or applications. The cookie will also identify your device, like the computer or smart phone.

We use the following types of cookies: (a) strictly necessary cookies, which are required for the website to function, for security and to prevent fraud, and which do not require consent; and (b) traffic-measurement cookies, set by our hosting provider's analytics script, which help us understand how many people visit the website and how it performs. The cookies currently set on our website are:

- **_tccl_visitor** identifies a returning visitor for traffic measurement. Kept for up to 12 months.
- **_tccl_visit** identifies a single visit for traffic measurement. Expires shortly after your visit ends.
- **_scc_session and cp_challenge** session cookies set by our hosting platform for session management and security. Deleted when you close your browser or shortly afterwards.

These cookies are set automatically by our hosting platform and our website does not currently display a cookie banner or offer cookie settings. We use the traffic-measurement cookies on the basis of our legitimate interest in understanding and improving our website. You can block or delete cookies at any time in your browser settings, or object to this use by doing so; this may affect how the website works. If we introduce other non-essential cookies in future (for example analytics or marketing cookies), we will update this policy and ask for your consent before they are placed.

Your duties and rights about the personal information we have about you:

You must provide proof of identity when enforcing the rights below.

You must inform us when your personal information changes.

Please contact our Information Officer to give effect to any of the below rights.

You have the right to request access to the personal information we have about you by contacting us. This includes requesting:

- confirmation that we hold your personal information.
- a copy or description of the record containing your personal information; and
- the identity or categories of third parties who have had access to your personal information.

We will attend to requests for access to personal information within a reasonable time. You may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties. We will inform you of the fee before attending to your request. Access requests are dealt with in accordance with our PAIA Manual, available via the PAIA Manual link in the footer of our website (www.luroinvestments.com). Confirmation of whether we hold your personal information is free of charge.

Please note that the law may limit your right to access information.

You have the right to request us to correct or delete the personal information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or we are no longer authorised to keep it. You may make your request free of charge, preferably on POPIA Form 2 (attached to our PAIA Manual), by email, post, hand delivery, telephone, SMS or WhatsApp. We will notify you of the action taken within 30 days of receiving your request. It may take up to 15 business days for the change to reflect on our systems. We may request documents from you to verify the change in personal information.

A specific agreement that you have entered into with us may determine how you must change your personal information provided at the time when you entered into the specific agreement. Please adhere to these requirements. If the law requires us to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your business relationship with us.

You may object on reasonable grounds to the processing of your personal information where we process it to protect your legitimate interests or to pursue our or a third party's legitimate interests. You may also object at any time, without giving reasons, to the processing of your personal information for direct marketing.

Once we receive a valid objection, we will stop that processing unless legislation provides otherwise. The right to object does not apply where we process your information because the law requires it or because it is necessary to conclude or perform a contract with you; where we rely on your consent, you may withdraw it as explained below. Objections may be made free of charge, preferably on POPIA Form 1, by any of the channels listed above.

Where you have provided your consent for the processing of your personal information, you may withdraw your consent. If you withdraw your consent, we will explain the consequences to you. We may proceed to process your personal information even if you have withdrawn your consent if the law permits or requires it. It may take up to 15 business days for the change to reflect on our systems, during this time we may still process your personal information.

You have a right to file a complaint with us or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information by us. We will address your complaint as far as possible.

The contact details for the Information Regulator are as follows:

Email:	POPIAComplaints@inforegulator.org.za (complaints); enquiries@inforegulator.org.za (general)
Telephone:	010 023 5200; toll-free 0800 017 160
Postal Address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Physical Address:	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

How can you get in touch with us?

For any queries in relation to this Privacy Policy or our processing of your personal information in general, you can contact our Information Officer and/or Deputy Information Officer at the following details:

Information Officer	
Name:	Genene Barnard
Contact Number:	+27 71 309 8124
Email Address:	genene@luroinvestments.com
Deputy Information Officer	
Name:	Traci-Leigh De Bruyn
Contact Number:	+27 76 227 7201
Email Address:	traci@luroinvestments.com
Physical Address:	Unit 4, 47 Columbus Crescent, Rivergate Business Park, Parklands, 7441
PAIA Manual:	Link in the footer of www.luroinvestments.com