

## **CORNERSTONE ASSET MANAGERS PRIVACY POLICY.**

Cornerstone Asset Managers is committed to protecting the privacy and security of personal information entrusted to us.

This privacy notice is for our clients and associated persons, our employees, institutional investors, financial intermediaries and consultants, and other professional third parties, such as custodians and service providers, with whom Cornerstone Asset Managers has a business relationship. We refer to such individuals in this notice as our “Business Stakeholders”.

This privacy policy applies to information collected through our online services that link to this Privacy policy including but not limited to [cornerstone.co.ug](http://cornerstone.co.ug), any mobile application associated with the site and all other Cornerstone email or online offerings that post a link to this Privacy Policy, whether accessed via computer, mobile device or other technology (“Services”), as well as information we may collect from you offline in connection with your relationship with us (“Personal Data”).

This privacy notice describes how we, as a “Data Controller”, collect and use personal information about you during and after your relationship with us, in accordance with the Data Protection and Privacy Act of Uganda.

### **Nature of personal information collected and generated;**

We may collect, store, and use the following categories of personal information about you:

- Contact details such as name, title, addresses, telephone numbers and email addresses;
- identification verification details such as National Identification Number (NIN), Passport Number, signatures, IP address and job titles in order to confirm your identity; and CCTV footage if you visit us at our offices.
- Where permitted in accordance with law, we may also in some circumstances record telephone conversations with you and collect phone metadata; please note that by communicating with us, you acknowledge your communication may be overheard, monitored, and recorded without further notice or warning;
- we collect a copy of the posts and other information, such as account ID and username if you interact with the services via a social media platform;
- we collect digital information using cookies, web beacons, page tags, pixels or similar tools that we and our service providers and other third parties have set when you interact with the Services, and in connection with our marketing and communications;
- If you provide us with additional information about you, in particular by email or on telephone calls, we may for regulatory reasons be required to store the record as a whole.

Below is a list of the categories of personal information, along with some descriptions and examples, that we may collect or generate through each of the processes described above. Some data categories may fit into multiple categories.

- **Personal identifiers:** This includes first and last name, address, email address, telephone number, evidence of your authority to act in your capacity as a representative, and records of agreements, payments, investments, and other transactions;
- **Business information:** This includes business name, number, address, email address, telephone number, evidence of your authority to act in the capacity as a representative, and record of agreement, payments, investments, and other transactions;
- **Device and online Identifiers and Related Information:** This includes online identifiers, Internet Protocol (IP) address, mobile/wireless carrier, account username and log-in information, device type and identifier, and other device information;
- **Background information:** This includes date of birth, family information, information about your personal and professional associates and associations, your interests and preferences and any other information we are required to collect by law and regulations;
- **Financial information:** This includes bank account number, transaction and account information used to validate your identity, source of wealth information, expected activity within your account, income and any other information regarding your financial circumstances.

- **Government identifiers:** Tax Identification Number (TIN), National Identification number (NIN), other government-issued identification number (such as driver's license, passport, or alien registration number) and copies of government-issued identification;
- **Protected Classification Characteristics:** This includes age, national origin, citizenship nationality, marital status, sex and criminal history.
- **Location Data:** We may collect and receive information about your geolocation and mobile device including a unique identifier for your device or estimated from your IP address.
- **Sensory Data:** This includes audio data, such as a recording of your choice when you call us;

## CHOICE AND CONSENT

Where we rely on consent as a legal basis for processing your personal data, you have the right to withdraw your consent to our processing of your personal data at any time but please note, that your withdrawal will not affect the lawfulness of our processing which was based on prior consent before your withdrawal, or which is based on other legal basis for processing your personal data.

Although you don't have to supply any of the personal information we request and can withdraw consent, we may not be able to provide products and services to you or you may not be able to interact with our Services if you do not.

Personal information does not include information that has been anonymized or aggregated so that it does not identify an individual.

### **How is your personal information collected?**

In most instances, we collect personal data directly from you when you fill in forms or communicate with us through our contact details. This includes personal data you provide when you:

- apply for our products or services.
- make enquiries.
- create an account on our website.
- register for our products offered through mobile and online platforms.
- request marketing information to be sent to you.
- give us feedback or contact us.
- provide goods or services to us as a supplier or contractor; or
- interact with our website. We collect this personal data by using cookies and similar technologies.

We may collect your personal data from a number of third parties or publicly available sources

In some instances, we will receive your personal data from various third parties or publicly available sources including:

- identity and contact data from the National Identification and Registration Authority (NIRA) and Integrated Population Registration Services platforms.
- identity and contact data from publicly available sources such as the Companies Registry and the Business Registration Service.

- social media. If you are a potential candidate for employment with us, we may have received your personal data from third parties such as recruiters or external websites.

### **How we will use information about you**

We will only use your personal information when the law allows us to; this is known as a “legal basis” for processing.

### **We may use your personal information to:**

- Authenticate identity;
- Contacting and communicating with you, including through push notifications and text messages;
- communicate with Business Contacts in relation to, or to facilitate the provision of, our services; the legal basis for this will be for performing a contract we have entered with you personally, or in furtherance of your and our legitimate interests;
- communicate with Business Contacts to provide you with information about Cornerstone and relevant events or research organised or produced by us, unless you have indicated to us that you do not wish to receive such information;
- process identification details of certain Business Contacts in order to confirm their identities, which is an anti-fraud measure to comply with our legal obligations;
- check identification details of Business Contacts against databases of individuals who are subject to sanctions, classified as “politically exposed persons”, or

have committed crimes and to follow up any suspicions, in order to ensure that we comply with our anti-money laundering and terrorism obligations and to avoid fraud itself; and

- meet our other compliance and regulatory duties, for example to retain certain records.
- record and/or monitor telephone conversations so as to maintain service quality and security, for staff training and fraud monitoring and to deal with complaints, disputes and potential and/or actual criminal activity. To the extent permitted by the law, these recordings are our sole property.

There may be overlap in the circumstances in which we use the same information about you but we guarantee that it is in accordance with the Laws of Uganda.

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law or regulation.

### **Data Sharing**

We may need to share your personal data with third parties, including other Business Contacts, and our auditors. Where we share your personal data with another party performing services for us, we require those third parties to respect the security of your personal data and to treat it in accordance with the law.

### **Which third party service providers appointed by Cornerstone will process my personal information?**

We may share your contact details with our preferred partners for relevant event invitations such as investment conferences. You may at any time inform us that you no longer wish to receive future invitations from us.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

### **Data Security**

We have put in place measures to protect the security of your information. Details of these measures are include the following:

- management and organisation of information security;
- classification of data which includes data handling rules;
- staff training on responsibilities connected to information security and the reporting of any information security incidents;
- physical and environmental security; and
- systems security, including backups, virus protection and access controls.

### **Data Retention**

We retain personal information for varying time periods depending on our relationship with you and the status of that relationship. When determining how long to keep personal information, we take into account our legal and regulatory obligations and our legitimate business interests such as; managing the services, preventing fraud, responding to regulatory or supervisory inquiries, and establishing, or exercising or defending legal claims, disputes or complaints.

### **Rights of access, correction, erasure, and restriction**

Under certain circumstances, by law you have the right to:

**Request access to your personal information.** This enables you to receive a copy of the personal information we hold about you.

**Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.

**Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

You can exercise these rights by contacting your usual Cornerstone relationship contact.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

## **MANAGING COOKIES**

Cookies are small files created on your computer when certain websites are loaded via your browser. They allow useful pieces of information to be provided to website owners, which enable you to use websites more efficiently and to save time (for example, by not having to input your details each time you visit the site).

We use cookies to collect standard information on website usage which includes information about how you logged on and from our website, including your IP address, information about your visit, your device information and how you use our website. This will include the capture of information on your approximate location.

By using our website, you agree that we can place cookies on your computer or other device. You may refuse the use of cookies on [insert email to do this] by selecting the appropriate settings in your browser, but you may lose some useful functionality. For more information about cookies, please visit the <https://allaboutcookies.org/> website which

gives details on how to delete cookies from your computer.

### **Changes to this Privacy Notice**

We may change this Privacy Policy from time-to-time. If we make changes to this Privacy Policy, we will update the “Effective Date” at the top of this Privacy Policy. Any changes will become effective when posted unless indicated otherwise. Your continued use of the Services following these changes will mean that you accept those changes.

### **Regulatory Complaint**

If you have any concerns on the management of your data and you need to contact the Data Protection office of Uganda including any concerns in relation to your legal rights, you can contact the regulator on using the details below.

Personal Data Protection Office

Palm Courts, Rotary Avenue (Former Lugogo Bypass)

**Email:** [info@pdpo.go.ug](mailto:info@pdpo.go.ug)