SA2IF – Privacy Policy

Protection of Personal Data — English translation of the French original

1. Preamble

The purpose of this Privacy Policy is to inform website users, clients, prospects, partners and any person dealing with SA2IF of how their personal data may be collected, used, stored, protected and, where applicable, disclosed.

SA2IF attaches particular importance to respect for privacy, to the confidentiality of the information entrusted to it and to the protection of personal data. This commitment is a natural extension of the professional, ethical and regulatory obligations incumbent on SA2IF as a licensed Management and Brokerage Company (Société de Gestion et d'Intermédiation).

In the course of its activities as a Management and Brokerage Company, SA2IF may process personal data necessary for client relationship management, the performance of financial services, regulatory compliance, the security of its systems, the handling of requests and the improvement of its services.

This Policy is established in accordance with the texts applicable in Burkina Faso, within the WAEMU/UEMOA area and on the regional financial market, in particular:

1. Law No. 001-2021/AN of 30 March 2021 on the protection of individuals with regard to the processing of personal data in Burkina Faso;
2. the texts relating to the Commission de l'Informatique et des Libertés (CIL) of Burkina Faso, the supervisory authority competent for personal data protection;
3. the regulations applicable to Management and Brokerage Companies licensed by the Financial Markets Authority of the West African Monetary Union (AMF-UMOA);
4. the regulations of the West African Economic and Monetary Union (UEMOA) relating to the regional financial market;
5. Law No. 046-2024/ALT of 30 December 2024 on combating money laundering, terrorist financing and the proliferation of weapons of mass destruction in Burkina Faso;
6. the tax, accounting, commercial, financial and prudential texts applicable to SA2IF's activities.

This Policy may be amended or supplemented at any time, in particular to reflect legislative, regulatory, technological or organisational developments. Any amendment will be reflected by an update of the date shown on the first page of this document and will be brought to users' attention by publication on SA2IF's website. Users are responsible for consulting this Policy regularly to be aware of any changes.

2. Data Controller

The controller of the personal data collected through SA2IF's website, services and activities is:

Company name	SA2IF — Société Africaine d'Intermédiation et d'Investissement Financier
Legal form	Public limited company (Société Anonyme)
Share capital	FCFA 1,000,000,000
Licence	CREPMF licence No. SGI / 2022-02 — obtained on 5 August 2022
Registered office	BP 459 Ouaga Kossyam, 10010 Ouagadougou, Burkina Faso
Website	www.sa2if.com
Email	clients@sa2if.com
Telephone	+226 25 46 46 35 / +226 64 36 99 99 / +226 75 20 01 01

SA2IF determines the purposes and means of the personal data processing carried out as part of its activities.

Where certain processing operations are carried out on behalf of SA2IF by service providers or technical partners, they act as processors and are bound by obligations of confidentiality, security and processing on instruction, in accordance with section 8 of this Policy.

To ensure the compliance of processing operations and the protection of data subjects' rights, SA2IF has appointed a Data Protection Officer (DPO) who independently oversees the application of personal data protection rules within the company and acts as the main point of contact with the data protection authority and with the persons concerned by the processing. For any question relating to this Policy, the DPO can be reached directly at the following address: [to be completed].

3. Personal Data Collected

In the course of its activities, SA2IF may collect and process the following categories of data:

3.1 Identification data

SA2IF may collect in particular surname, first names, date and place of birth, nationality, gender, signature, photograph, and any document necessary to identify the data subject.

3.2 Contact details

SA2IF may collect in particular the postal address, email address, landline or mobile telephone number and any other information enabling contact with the data subject.

3.3 Professional, financial and asset data

As part of onboarding, account opening or the assessment of the investor profile, SA2IF may collect information relating to occupation, employer, income, assets, source of funds, investment objectives, risk profile, bank accounts or securities accounts.

3.4 Tax and regulatory data

SA2IF may collect the information necessary to comply with its tax, accounting, financial, prudential and regulatory obligations, in particular tax residence, tax identification number, information on beneficial owners or any element required under reporting obligations.

3.5 Transactional data

SA2IF may process data relating to stock market orders, transactions carried out, account movements, portfolio statements, settlement-delivery instructions and the history of the business relationship.

3.6 Compliance data

As part of its know-your-customer and due diligence obligations and its obligations to combat money laundering, terrorist financing and the proliferation of weapons of mass destruction, SA2IF may process information relating to client identification, beneficial owners, politically exposed person (PEP) status, source of funds, compliance checks and transactions subject to particular monitoring.

3.7 Communication data

SA2IF may retain letters, emails, forms, information requests, complaints, exchanges with customer service, documents sent and any correspondence useful for following up the relationship.

3.8 Technical and browsing data

When using SA2IF's website, certain technical data may be collected, in particular the IP address, browser type, operating system, pages viewed, date and time of connection, duration of visit, referring site and data from cookies or similar technologies.

4. Mandatory or Optional Nature of Data

Certain data are necessary to enable SA2IF to respond to a request, establish a business relationship, open an account, perform a service, comply with a legal or regulatory obligation, or ensure the security of operations.

Where the requested data are mandatory, refusal to provide them may prevent SA2IF from providing all or part of the requested services, from opening or maintaining a business relationship, or from carrying out certain operations.

Optional data are collected only where they are useful for the purpose pursued or where the data subject freely chooses to provide them.

5. Purposes of Processing

The personal data collected by SA2IF are used only for specific, legitimate and proportionate purposes.

SA2IF may process personal data for the following purposes:

1. establishing and managing the relationship with clients, prospects and partners;
2. handling requests for information, contact, subscription or appointments;
3. opening, managing and monitoring securities accounts;
4. receiving, transmitting and executing stock market orders;
5. monitoring transactions, portfolios and statements;
6. complying with know-your-customer obligations;
7. meeting obligations to combat money laundering, terrorist financing and the proliferation of weapons of mass destruction;
8. complying with tax, accounting, financial, prudential and regulatory obligations;
9. handling complaints, disputes, litigation and requests to exercise rights;
10. ensuring the security of the website, information systems and operations;
11. preventing fraud, abuse, unauthorised access or security incidents;
12. sending information on SA2IF's services, products, publications or news;
13. producing statistics, traffic analyses and audience measurements;
14. improving services, digital tools and user experience;

15. opening and managing the account of a client of the premium area.

SA2IF uses personal data only as strictly necessary for the purposes stated above, or for any other purpose compatible with them.

Where the regulations so require, the prior consent of the data subject is obtained before the processing is implemented.

6. Legal Basis for Processing

The processing of personal data carried out by SA2IF may be based, depending on the case, on:

1. the performance of a contract or of pre-contractual measures;
2. compliance with a legal or regulatory obligation;
3. SA2IF's legitimate interest, in particular for security, complaint handling, fraud prevention or service improvement;
4. the data subject's consent, in particular where it is required for certain communications or certain cookies;
5. the protection of SA2IF's legitimate rights and interests in the defence or exercise of legal claims.

7. Recipients of Data

The personal data collected by SA2IF are intended for authorised internal departments, within the limits of their remit and on a need-to-know basis.

The following may in particular have access to the data where necessary:

1. client relationship teams;
2. sales teams;
3. compliance and internal control teams;
4. back-office teams;
5. accounting and finance teams;
6. IT teams;
7. general management;
8. persons responsible for handling complaints or requests to exercise rights.

SA2IF may also disclose certain personal data to external recipients where necessary for the performance of its services, compliance with its obligations or the security of its activities.

These recipients may include in particular:

1. the Financial Markets Authority of the West African Monetary Union (AMF-UMOA);
2. the Regional Securities Exchange (BRVM — Bourse Régionale des Valeurs Mobilières);
3. the Central Depository / Settlement Bank (DC/BR);
4. the competent administrative, tax, judicial or supervisory authorities;
5. the National Financial Intelligence Unit (CENTIF) of Burkina Faso;
6. banks and financial institutions involved in the execution of transactions;
7. IT service providers, hosting providers, software publishers and technical service providers;
8. advisers, auditors, statutory auditors or experts acting within the scope of their assignments;
9. any other recipient authorised by law or required by a competent authority.

SA2IF does not sell, rent or transfer personal data to third parties for commercial purposes.

8. Subcontracting

Where SA2IF entrusts certain processing operations to service providers, they act solely on behalf of SA2IF and on its instructions.

SA2IF ensures that its processors provide sufficient guarantees regarding confidentiality, security and personal data protection.

Processors are required to:

1. process the data only for the intended purposes;
2. respect the confidentiality of the data;
3. implement appropriate security measures;
4. not use the data for their own purposes;
5. return, delete or anonymise the data at the end of the service, in accordance with SA2IF's instructions and applicable obligations.

9. Transfers of Data Outside Burkina Faso

As part of its activities on the regional financial market, SA2IF may transfer, or make accessible, certain personal data to recipients located outside Burkina Faso, in particular within the UEMOA area or to technical service providers involved in the services provided.

These transfers may be necessary for the execution of transactions, settlement-delivery, data storage, IT security, regulatory reporting, compliance or client relationship management.

SA2IF ensures that these transfers are carried out in compliance with the law and within an appropriate legal, contractual and security framework.

Where the regulations so require, SA2IF completes the required formalities with the competent authority and puts in place the necessary safeguards, in particular confidentiality undertakings, security clauses, obligations to process on instruction, appropriate technical measures and mechanisms for reversibility or deletion of data.

10. Data Retention

SA2IF retains personal data for no longer than necessary for the purposes for which they were collected, subject to the retention periods imposed by legal, regulatory, accounting, tax, financial, prudential or compliance obligations concerning the retention of documents, the principle being ten (10) years.

Retention periods may therefore depend in particular on:

1. the duration of the business relationship;
2. retention obligations applicable to know-your-customer (KYC) documents;
3. obligations relating to financial transactions;
4. accounting and tax obligations;
5. obligations to combat money laundering, terrorist financing and the proliferation of weapons of mass destruction;
6. the time needed to handle complaints or litigation;
7. the data subject's consent or objection in respect of certain communications.

At the end of the applicable periods, data are deleted, archived where the law so requires, or irreversibly anonymised for statistical purposes.

11. Rights of Data Subjects

In accordance with the regulations applicable to personal data protection, every data subject has rights over the data concerning them.

These rights include in particular:

1. the right to be informed about the processing carried out;
2. the right to access the data concerning them;
3. the right to request rectification of inaccurate, incomplete, equivocal or outdated data;

4. the right to request erasure or deletion of data where the legal conditions are met;
5. the right to object to the processing of their data, in particular on legitimate grounds or for direct marketing purposes;
6. the right to withdraw consent where the processing is based on consent;
7. the right to lodge a complaint with the authority competent in personal data protection.

The exercise of certain rights may be limited where the data must be retained by SA2IF pursuant to a legal or regulatory obligation, in particular in accounting, tax, financial, prudential or know-your-customer matters, or in the fight against money laundering, terrorist financing and the proliferation of weapons of mass destruction.

To exercise their rights, data subjects may send a request to SA2IF through the Data Protection Officer (DPO):

By email	clients@sa2if.com
By post	BP 459 Ouaga Kossyam, 10010 Ouagadougou, Burkina Faso
By telephone	+226 25 46 46 35 / +226 64 36 99 99 / +226 75 20 01 01

SA2IF may request any additional information necessary to identify the requester and process the request.

SA2IF responds to requests as soon as possible and within the time limits provided by the applicable regulations.

12. Security and Confidentiality

SA2IF implements appropriate technical and organisational measures to protect personal data against destruction, loss, alteration, unauthorised disclosure, unauthorised access or any other form of unlawful processing.

These measures may include in particular:

1. access control to systems and premises;
2. authentication of authorised users;
3. management of access rights on a need-to-know basis;
4. logging of access to sensitive systems;
5. encryption or equivalent measures where appropriate;

6. regular data backups;
7. staff awareness of confidentiality obligations;
8. incident management procedures;
9. business continuity and disaster recovery;
10. contractual framework for service providers and processors.

SA2IF takes the confidentiality of the personal data entrusted to it very seriously. Any person involved in the processing of data is bound by a duty of confidentiality.

In the event of a security incident or personal data breach likely to result in a risk to the rights of the data subjects, SA2IF takes the necessary measures in accordance with the applicable regulations.

13. Marketing and Communications

SA2IF may send data subjects information about its services, products, publications, events, news or institutional communications.

Where the regulations require the data subject's prior consent, SA2IF ensures that this consent is obtained before any marketing communications are sent.

Data subjects may at any time ask not to receive marketing communications from SA2IF.

This request may be made by the means indicated in the communication received or by contacting SA2IF at the contact details provided in this Policy.

14. Cookies

SA2IF's website may use cookies or similar technologies.

Cookies are small files placed on the user's device when browsing a website. They may be used to ensure the operation of the site, facilitate navigation, remember certain preferences, measure traffic or improve the services offered.

SA2IF may use in particular:

1. cookies strictly necessary for the operation of the site;
2. security cookies;
3. functional cookies;
4. analytics or audience measurement cookies.

Strictly necessary cookies may be placed without prior consent where they are indispensable to the operation of the site or to the provision of the service requested by the user.

Cookies that are not strictly necessary are placed after informing the user and, where the regulations so require, after obtaining their consent.

The user may at any time change their preferences or withdraw their consent via the tool provided for this purpose, where available, or via their browser settings.

Refusal of certain cookies may make it impossible to access certain non-essential features of the site.

15. Hyperlinks

SA2IF's website may contain links to third-party websites, in particular institutions, partners, market authorities, financial publications or external resources.

SA2IF has no means of controlling the content of these sites or their personal data protection practices.

SA2IF cannot be held liable for the content, services, products, information or data processing carried out by these third-party sites.

Users are invited to consult the privacy policies and terms of use applicable to third-party sites before providing them with personal data.

16. Intellectual Property

All content published on SA2IF's website, including in particular texts, data, graphics, images, logos, icons, documents, presentations, publications, videos, animations, sounds, trademarks, distinctive signs and their layout, is protected by intellectual property rules.

Unless otherwise stated, these elements are the exclusive property of SA2IF or of its partners, service providers or rights holders who have authorised their use.

Any reproduction, representation, modification, distribution, adaptation, extraction or exploitation, in whole or in part, of these elements, on any medium whatsoever, is prohibited without the prior written authorisation of SA2IF or the rights holders concerned.

Reproductions for strictly private use and non-commercial information purposes may be authorised provided that the source is acknowledged, the integrity of the reproduced content is respected, and there is no use likely to harm the rights or image of SA2IF.

17. Accuracy of Information and Availability of the Site

SA2IF uses reasonable means at its disposal to ensure the accuracy, reliability, availability and updating of the information published on its website.

However, errors, omissions, interruptions, unavailability or failures to update may occur.

SA2IF cannot be held liable for the consequences resulting from an error, an omission, a temporary unavailability of the site or the use of published information out of context.

Users may report any error, omission, access difficulty or anomaly by contacting SA2IF at the contact details given in this Policy.

18. Formalities with the Competent Authority

Where the applicable regulations so require, SA2IF completes the formalities relating to personal data processing with the Commission de l'Informatique et des Libertés (CIL) of Burkina Faso, an independent administrative authority created by Law No. 001-2021/AN of 30 March 2021 on the protection of individuals with regard to the processing of personal data.

These formalities may take the form of a declaration, a request for an opinion, a request for authorisation or any other procedure provided for by the applicable texts.

SA2IF ensures that the processing it carries out is documented, justified, proportionate and secure.

19. Complaint to the Competent Authority

Any data subject who considers that the processing of their personal data infringes their rights may lodge a complaint with the Commission de l'Informatique et des Libertés (CIL), the authority competent in personal data protection in Burkina Faso.

Referral to the competent authority does not prevent the data subject from first contacting SA2IF in order to seek an amicable solution.

20. Governing Law and Jurisdiction

This Policy is governed by Burkinabè law.

Any dispute relating to the interpretation, performance or application of this Policy that cannot be resolved amicably shall be submitted to the competent courts of Burkina Faso, subject to mandatory legal provisions.

21. Contact

For any question, request for information, complaint or request concerning the exercise of rights over personal data, SA2IF may be contacted through the Data Protection Officer (DPO):

Competent department	Customer Service / Compliance
Email	clients@sa2if.com
Postal address	BP 459 Ouaga Kossyam, 10010 Ouagadougou, Burkina Faso
Telephone	+226 25 46 46 35 / +226 64 36 99 99 / +226 75 20 01 01

SA2IF undertakes to process requests as soon as possible and in accordance with the applicable regulations.

Translator's notes: reviewer comments in the original

The original PDF contains tracked changes and four margin comments. The translation above follows the revised wording (e.g. AMF-UMOA rather than CREPMF, and the revised wording in sections 9, 10 and 19). The comments, translated:

- **[A1] (Section 2, DPO):** SA2IF may appoint, in accordance with Article 29 of Law No. 001-2021/AN, a Data Protection Officer (DPO) who will serve as the point of contact with the data protection authority and with data subjects. The DPO will be responsible for raising awareness among, informing and advising SA2IF and its employees about their legal obligations, while ensuring compliance with the legislation in force and the applicable frameworks. Given the qualities required, this person may be appointed within the DACI, as they must be an independent person with skills at the crossroads of law, IT and risk management.
- **[A2] (Section 11):** Address to be reviewed if the proposed DPO appointment is approved.
- **[A3] (Sections 16 and 17):** Since the Privacy Policy is a clear, concise, transparent and easily accessible unilateral information document, these two points can be referred to the Terms of Use (CGU), which cover intellectual property, site availability and maintenance, and the publisher's liability (SA2IF in this case). One can simply state: "For any question about the overall use of the site or intellectual property rights, users may refer to our [Terms of Use]." The same cross-reference can be added as a hyperlink in the Terms of Use: "To learn more about how your data is managed and your rights, please consult our [Privacy Policy]."
- **[A4] (Section 21):** In the same vein, only the Compliance department can be kept. Address also to be reviewed.