OBSIDIAN WEALTH

ASSET MANAGEMENT

A Juristic Representative of HODL OTC
Company Registration No. 2020/773138/07

COOKIE POLICY

37 Merlin Circle
Silbury Hill
Nelspruit, 1201

jacques@obsidianwealth.co.za
0825563705
FSP 53723

Document Control

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Document History

Version	Date	Status	Amended by	Summary of Changes
01	March 2026	Accepted	C Serfontein	Creation
02	May 2026	Accepted	C Serfontein	Clarified **Responsible Party positioning** between Obsidian Wealth and HODL OTC Added **explicit prohibition of automated advice / decision-making via cookies** Strengthened **consent requirement** (no non-essential cookies before consent) Introduced **Cross-Border Data Transfers subsection** (POPIA Section 72 compliance) Added **legal basis for processing** (consent, legitimate interest, legal obligation) Tightened **marketing wording** to avoid regulatory interpretation risk Included **"no sale of personal information" statement** Improved **Information Officer / contact clarity** Removed **duplicated wording in cookie management section** Corrected **document version control inconsistencies**

Management approval

Document Version	Name	Position	Signed	Date
01	J. Serfontein	Director		March 2026
02	J. Serfontein	Director		May 2026

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1. Introduction

Obsidian Wealth Asset Management (Pty) Ltd (“Obsidian Wealth”) operates as a juristic representative under HODL OTC (Pty) Ltd (FSP 53723). While providing digital advisory services and maintaining our online platforms, we utilise cookies and similar technologies to enhance functionality, improve user experience, and support operational efficiency.

Obsidian Wealth Asset Management (Pty) Ltd operates as a juristic representative of HODL OTC (Pty) Ltd (FSP 53723).
For purposes of POPIA, Obsidian Wealth acts as a Responsible Party in respect of personal information processed through its own digital platforms and client interactions, while certain processing activities may be conducted in conjunction with or on behalf of HODL OTC, depending on the underlying system or service infrastructure.

We are committed to ensuring that all personal information is processed lawfully, transparently, and in accordance with applicable regulatory and data protection frameworks. Obsidian Wealth does not sell personal information collected through cookies to third parties.

Personal information collected through cookies is processed on the following legal bases:

- Consent (for non-essential cookies)
- Legitimate interest (for essential operational functionality)
- Compliance with legal and regulatory obligations, where applicable

2. What are cookies?

Cookies are small text-based data files that are stored on your device, such as a computer, smartphone, or tablet—when you access or interact with a website. These files enable the website to recognise your device, remember your preferences, and facilitate a more secure, efficient, and personalised browsing experience. Cookies play a critical role in the technical functioning of modern websites by supporting authentication processes, maintaining session integrity, and enabling continuity between pages and visits.

Cookies may be broadly classified into **session cookies** and **persistent cookies**. Session cookies are temporary in nature and are automatically deleted once you close your browser. They are primarily used to support essential website functions, such as maintaining login sessions or ensuring smooth navigation between pages. Persistent cookies, on the other hand, remain stored on your device for a predetermined period or until they are manually deleted. These cookies allow websites to recognise returning users, remember preferences (such as language or region), and support longer-term functionality and analytics.

In addition to this classification, cookies may also serve different functional purposes, including strictly necessary cookies required for core platform operation, preference cookies that enhance user experience, analytics cookies that provide insights into website usage and performance, and marketing or advertising cookies that help tailor content relevance. Where cookies collect or are capable of being linked to identifiable information, such data is treated as personal information in terms of applicable data protection laws, including POPIA, and is processed accordingly.

Overall, cookies are an integral component of digital infrastructure, enabling both operational efficiency and an improved, more tailored user experience, while remaining subject to appropriate governance, consent, and data protection controls.

3. How we use cookies

Obsidian Wealth uses cookies in a controlled and compliance-aligned manner to support the following:

3.1 Essential Functionality

Certain cookies are classified as strictly necessary cookies and are fundamental to the secure and effective operation of our website and associated digital platforms. These cookies enable core system functionality without which the website would not be able to operate as intended. Their primary purpose is to support essential processes such as secure user authentication, maintaining active sessions during login, ensuring consistent platform navigation, and preserving transactional integrity throughout user interactions. For example, these cookies allow the system to recognise that a user is logged in, prevent unauthorised access, and ensure that actions performed across different pages are correctly processed and recorded.

In addition, strictly necessary cookies play a critical role in maintaining system stability, managing security protocols, and protecting against fraudulent or malicious activity. They may also support load balancing, error management, and the proper functioning of infrastructure components that underpin the website’s performance. Given their essential nature, these cookies do not collect information for marketing purposes and are not used to track users across external websites.

In accordance with applicable data protection laws, including the Protection of Personal Information Act (POPIA), these cookies do not require user consent, as they are necessary for the provision of a service explicitly requested by the user. However, any personal information processed through such cookies remains subject to appropriate safeguards, confidentiality requirements, and lawful processing principles.

3.2 Preference and Experience Enhancement
In addition to essential functionality, Obsidian Wealth may utilise cookies to enhance the overall user experience by remembering individual preferences and custom settings across visits. These cookies are designed to improve usability and convenience by enabling the website to recognise returning users and tailor certain aspects of the interface accordingly. This may include storing preferences such as language selection, regional settings, display configurations, and other user-specific customisations that contribute to a more personalised and efficient interaction with the platform.

By retaining these preferences, the website is able to provide a more seamless and consistent experience, eliminating the need for users to repeatedly input the same information or adjust settings each time they access the platform. This not only improves user efficiency but also supports a more intuitive and user-friendly environment aligned with the expectations of a premium digital advisory service.

While these cookies enhance functionality and usability, they do not perform core operational functions and are therefore not strictly necessary. As such, where required under applicable data protection legislation, including POPIA, these cookies may be subject to user consent. Any information collected through such cookies is handled in accordance with applicable data protection principles, ensuring that personal information, where applicable, is processed lawfully, securely, and with appropriate regard to user privacy.

3.3 Analytics and Performance Monitoring
Obsidian Wealth may utilise analytics and performance monitoring cookies, including tools such as Google Analytics or similar service providers, to gain insight into how users interact with our website and digital platforms. These cookies allow us to analyse user behaviour in a structured and aggregated manner, including metrics such as page visits, time spent on the platform, navigation paths, interaction patterns, and overall engagement trends. This information is critical in enabling us to assess the effectiveness of our digital infrastructure and identify areas where functionality, usability, or content can be improved.

Through these insights, we can enhance platform performance, optimise user journeys, and refine the delivery of our advisory services in a way that aligns with client expectations and evolving digital standards. Analytics data also supports internal decision-making processes, including technology enhancements, interface improvements, and service optimisation strategies.

Where possible, the information collected through these cookies is aggregated and anonymised, meaning it does not directly identify individual users. However, in instances where such data may be capable of being linked to an identifiable individual, it is treated as personal information and processed in accordance with the Protection of Personal Information Act (POPIA). These cookies are not essential to the core functioning of the website and are therefore activated only with the user's consent, in line with applicable data protection and consent requirements.

3.4 Marketing and Communication Optimisation
Where appropriate, Obsidian Wealth may utilise cookies to support responsible marketing practices and enhance the relevance of communications presented to users. These cookies enable us and, where applicable, selected third-party partners to better understand user interests, engagement patterns, and interaction history, allowing for the delivery of content that is more aligned with individual preferences and needs. This may include tailoring website content, refine website content and general informational materials, and ensure that any promotional or educational messaging is relevant, appropriate, and not excessive or intrusive.

The use of such cookies also assists in reducing exposure to irrelevant advertising or communications by ensuring that users are not repeatedly presented with content that does not align with their interests or profile. In this way, marketing and communication optimisation cookies contribute to a more refined and client-centric digital experience, consistent with Obsidian Wealth's positioning as a bespoke advisory business.

These cookies are not essential to the functioning of the website and will only be activated with the user's explicit consent, in accordance with the Protection of Personal Information Act (POPIA). Where the data collected through these cookies can be linked to an identifiable individual, it is treated as personal information and processed in line with applicable legal requirements, including principles of lawful processing, purpose limitation, and data minimisation. Obsidian Wealth does not utilise such cookies to make automated decisions or provide advice without client engagement, and all marketing activities remain aligned with our broader commitment to transparency, professionalism, and regulatory compliance.

Obsidian Wealth does not utilise cookies or similar technologies to provide automated financial advice, make investment decisions, or execute transactions on behalf of clients. prior consent BEFORE processing begins. No non-essential cookies are deployed prior to the user providing explicit consent. All financial advice and transaction activity is conducted through direct client engagement and only upon explicit client instruction, in accordance with applicable FAIS requirements.

4. Consent and your choices

In accordance with the Protection of Personal Information Act, 4 of 2013 (POPIA), Obsidian Wealth applies a strict consent-based approach to the use of non-essential cookies. Cookies that are not required for the core operation of the website, such as those used for analytics, performance monitoring, marketing, or user profiling, will only be activated once the user has provided explicit, informed consent. This ensures that users retain full control over how their information is collected and processed within the digital environment.
Upon accessing our website for the first time, users are presented with a clearly visible cookie banner or preference management tool. This interface allows users to make granular and informed choices regarding their cookie preferences, including the ability to accept all cookies, reject non-essential cookies, or customise their selections based on specific categories. No non-essential cookies will be deployed unless and until such consent has been actively provided through this mechanism.

Users retain the ability to manage their consent on an ongoing basis. At any time, users may revisit the cookie settings tool to withdraw previously granted consent, modify their preferences, or disable specific categories of cookies. These preferences are recorded and applied to future interactions with the website, ensuring consistency with the user's stated choices.

While users have full discretion over cookie settings, it is important to note that disabling certain categories of cookies may impact aspects of website functionality, performance, or user experience. For example, certain features may not operate optimally without the support of preference or analytics cookies.

This consent-driven approach reflects Obsidian Wealth's commitment to transparency, user autonomy, and compliance with POPIA, and aligns with enhanced regulatory expectations regarding explicit consent, user control, and responsible data processing practices.

5. Retention of cookies

The duration for which cookies are retained on your device varies depending on their nature, purpose, and functional role within the website. Cookies are generally classified as either **session cookies** or **persistent cookies**. Session cookies are temporary and are automatically deleted once you close your browser. These cookies are primarily used to maintain session integrity, support secure navigation, and ensure continuity during a single browsing session. Persistent cookies, by contrast, remain stored on your device for a defined period or until they are manually deleted. These cookies enable the website to recognise returning users, retain preferences, and support longer-term functionality such as analytics and performance monitoring.

For example, certain analytics cookies may be retained for periods of up to 24 months to facilitate meaningful trend analysis, improve platform performance, and support ongoing service optimisation. However, the retention period applied to any cookie is always proportionate to its intended purpose and is not excessive.

Obsidian Wealth applies strict data governance principles to all cookie-related data. Any information collected through cookies is retained only for as long as necessary to fulfil the specific purpose for which it was collected, and always in accordance with the principles of **data minimisation**, **purpose limitation**, and **lawful processing** as required under POPIA. This means that we do not retain personal information indefinitely or beyond what is operationally justified.

Where cookie data may constitute or be linked to personal information, it is subject to appropriate safeguards, including secure storage, restricted access, and controlled retention practices. Once the purpose for which the data was collected has been fulfilled, or where retention is no longer legally or operationally required, such data will be securely deleted or anonymised in line with applicable data protection standards.

6. Third-party cookies

Obsidian Wealth may permit certain third-party service providers to place cookies on our website to support specific functions such as analytics, performance monitoring, and, where applicable, marketing optimisation. These third-party cookies enable external providers to deliver specialised services, including tracking aggregated website usage, monitoring system performance, and assisting with the refinement of digital content and communication strategies. Typical examples may include analytics platforms, performance monitoring tools, or carefully selected marketing technology providers.

Depending on the nature of the service provided, these third parties may act either as **independent Responsible Parties** or as **Operators** in terms of the Protection of Personal Information Act (POPIA). As Responsible Parties, they may determine their own purposes and means of processing personal information, while as Operators, they process information on behalf of Obsidian Wealth in accordance with defined instructions. In either case, such providers may process information in line with their own privacy or cookie policies, which users are encouraged to review for a full understanding of how their data is handled.

Obsidian Wealth adopts a risk-based and compliance-driven approach to the use of third-party providers. We take reasonable and appropriate steps to ensure that all such providers implement robust **technical and organisational security measures**, including data protection controls, access management, and secure processing environments. Furthermore, we conduct due diligence to ensure that these providers operate within acceptable regulatory and industry standards, and that their data processing practices align, as far as reasonably practicable, with the requirements of POPIA and broader data protection frameworks.

Where personal information is processed through third-party cookies, such processing is subject to appropriate safeguards, contractual controls where applicable, and ongoing oversight as part of our broader operational risk and compliance framework. This approach reflects an enhanced focus on third-party accountability, transparency, and responsible data governance within Obsidian Wealth's digital ecosystem.

Where cookie-related data is processed by third-party providers located outside of South Africa, such processing may result in the transfer of personal information across borders.
Obsidian Wealth will only permit such transfers where:

- The recipient is subject to laws, binding corporate rules, or agreements that provide an adequate level of protection; or
- The data subject has provided consent; or
- The transfer is otherwise compliant with Section 72 of POPIA.

7. Your rights under POPIA

In accordance with the Protection of Personal Information Act, 4 of 2013 (POPIA), you are afforded several important rights in relation to any personal information that may be collected, processed, or stored using cookies and similar technologies. These rights are designed to ensure transparency, accountability, and user control over personal data. You have the right to request access to any personal information held about you, including information that may have been collected through cookies where such data can be linked to your identity. This enables you to understand what information is being processed and for what purpose.

You also have the right to request the correction or deletion of personal information that is inaccurate, incomplete, irrelevant, excessive, or processed unlawfully. In addition, you may object to the processing of your personal information, particularly where such processing relates to direct marketing, profiling, or non-essential analytics activities. Where processing is based on consent, you retain the right to withdraw that consent at any time, without affecting the lawfulness of processing that occurred prior to withdrawal.

Furthermore, you have the right to lodge a complaint with the Information Regulator if you believe that your personal information has been processed in a manner that does not comply with POPIA. Obsidian Wealth is committed to facilitating the exercise of these rights in a transparent and efficient manner, and all requests relating to personal information or data subject rights may be submitted using the contact details provided in this policy.

These rights reflect the strengthened data subject protection framework under POPIA and form part of Obsidian Wealth's broader commitment to lawful processing, client confidentiality, and responsible data governance.

8. Information Officer

In accordance with Section 55 of POPIA, the appointed Information Officer is responsible for:

- Data protection compliance
- Handling data subject requests
- Overseeing lawful processing practices

Information Officer: Cindy Serfontein
Entity: Obsidian Wealth Asset Management (Pty) Ltd (via HODL OTC)
Email: compliance@obsidianwealth.co.za

9. Managing cookies

You can manage, restrict, or disable cookies at any time through your web browser settings or by using the "Manage Cookies" or cookie preference tool available on our website. Most modern browsers allow users to control cookie behaviour by blocking certain categories of cookies, deleting stored cookies, or configuring alerts when cookies are being placed on a device. In addition, our on-site cookie management tool provides a more user-friendly and granular approach, enabling you to customise your preferences by category, such as essential, analytics, or marketing cookies.

This level of control allows you to make informed decisions about how your information is collected and used. However, it is important to understand that disabling or restricting certain types of cookies, particularly those related to functionality or performance, may impact how the website operates. This may include limitations in navigation, reduced platform responsiveness, loss of saved preferences, or the inability to access certain secure areas of the site.

While users retain full discretion over their cookie settings, Obsidian Wealth recommends managing cookie preferences through the on-site cookie tool, as this ensures a balanced approach between privacy control and optimal platform performance. All cookie management options are designed to align with POPIA requirements, ensuring that users can exercise meaningful control over their personal information while maintaining access to a high-quality and secure digital experience.

Most web browsers allow you to block or delete cookies through their settings, and you may choose to do so at any time. However, please note that disabling cookies may affect the functionality of our website. For the most convenient experience, we recommend that you manage your preferences directly through the "Manage Cookies" link on our website, where you can choose which categories of cookies you wish to allow.

10. Updates to this policy

This Cookie Policy may be reviewed and updated from time to time to ensure ongoing alignment with applicable legal requirements, technological developments, and the evolving nature of Obsidian Wealth's business operations and digital infrastructure. Such updates may be necessary to reflect changes in legislation, including developments under the Protection of Personal Information Act (POPIA), advancements in cookie technologies and data processing practices, or enhancements to our website functionality and service offering.

Whenever updates are made, the revised version of this policy will be published on our website with a clearly indicated effective date, ensuring that users are able to identify the most current version. In instances where changes are material, particularly where they impact how personal information is collected, processed, or shared, Obsidian Wealth will take reasonable steps to provide appropriate notice. This may include website notifications, updated cookie banners, or other prominent communication mechanisms designed to ensure that users are informed of such changes.

We encourage users to review this Cookie Policy periodically to remain informed about how cookies are used and how personal information is managed within our digital environment. Continued use of the website following the publication of updates may be interpreted as acknowledgement of the revised terms, subject to applicable consent requirements where relevant. If you have any questions about this policy or need assistance with managing cookies, please contact us at compliance@obsidianwealth.co.za or call us on **082 556 3705**.

11.Conclusion

This Cookie Policy reflects Obsidian Wealth's commitment to maintaining the highest standards of data protection, transparency, and responsible digital governance. While cookies are an essential component of modern online functionality, their use within our environment is carefully controlled, purpose-driven, and aligned with applicable regulatory frameworks, including the Protection of Personal Information Act (POPIA).

Obsidian Wealth adopts a measured and compliance-focused approach to all forms of data processing, ensuring that personal information, whether collected directly or through technologies such as cookies, is handled with due care, confidentiality, and integrity. We prioritise user autonomy by implementing clear consent mechanisms, providing accessible preference management tools, and enabling the effective exercise of data subject rights.

Our use of cookies is designed to enhance the user experience, improve platform performance, and support the delivery of a seamless and secure digital environment, without compromising on privacy or regulatory obligations. Where third-party technologies are involved, we apply appropriate oversight and due diligence to ensure that such integrations meet acceptable security and compliance standards.

As part of our broader advisory and operational framework, Obsidian Wealth remains committed to ongoing review, continuous improvement, and alignment with best practice in both financial services and data protection. Users are encouraged to engage with this policy, manage their preferences proactively, and contact us should they require any clarification or assistance. Ultimately, this policy forms part of our wider commitment to building a trusted, transparent, and client-centric advisory environment, where both financial and personal information are treated with the highest level of professionalism and care.