



PRIVACY NOTICE

Effective date: 19 June 2026

Last updated: 19 June 2026

1. Introduction

Two Oceans Holdings, trading as SpinOut Advisory (“SpinOut Advisory”, “we”, “us” or “our”), respects your right to privacy and is committed to protecting personal information in accordance with the Protection of Personal Information Act 4 of 2013 (“POPIA”) and other applicable South African laws.

This Privacy Notice explains how we collect, use, store, share and protect personal information obtained through:

- the SpinOut Advisory website;
- website enquiry and contact forms;
- email, telephone and other correspondence;
- introductory discussions, proposals and contracted engagements;
- events, professional networking and business-development activities; and
- our relationships with clients, prospective clients, founders, directors, investors, technology transfer offices, professional advisers and service providers.

2. Responsible party

The responsible party for personal information processed under this Privacy Notice is:

Two Oceans Holdings, trading as SpinOut Advisory

Registration number: 2026/191618/07

Business or registered address: c/o 31 Beach Road, Mouille Point, Cape Town 8005

Website: www.spinoutadvisory.co.za

SpinOut Advisory is a trading name of Two Oceans Holdings

Registration number 2026/191618/07.

Address: 31 Beach Road, Mouille Point, Cape Town, South Africa, 8005

Mobile : +27 (0)83 4562760 | email: spinoutadvisory@icloud.com

www.spinoutadvisory.co.za

Information Officer

Name: Belinda Shaw

Telephone: +27 83 456 2760

Email: spinoutadvisory@icloud.com

Questions, objections and requests concerning personal information may be directed to the Information Officer using these contact details.

3. Personal information we may collect

Depending on how you interact with SpinOut Advisory, we may collect and process the following categories of personal information:

3.1 Identity and contact information

- name and surname;
- organisation or institution;
- job title or professional role;
- email address;
- telephone number;
- business address; and
- preferred method of communication.

3.2 Enquiry and correspondence information

- information submitted through our website forms;
- email and telephone correspondence;
- meeting notes;
- details of the service or support being requested; and
- information voluntarily provided during introductory discussions.

3.3 Professional and engagement information

Where you are involved in an advisory engagement, we may process:

- your position and responsibilities within a venture or institution;
- board, founder, shareholder or management information;
- professional qualifications and experience;
- meeting attendance and correspondence;
- actions, decisions and responsibilities allocated to individuals;
- information contained in governance and management records; and
- other information reasonably required to provide the agreed services.

The collection and use of information during a contracted engagement may also be governed by the applicable engagement letter, services agreement and confidentiality provisions.

3.4 Business and transactional information

We may process:

- proposal and contract information;
- billing and payment records;
- supplier and service-provider details;
- tax and accounting records; and
- records required for legal, regulatory or administrative purposes.

We do not intend to collect payment-card details directly through the website unless a secure payment service is introduced and disclosed separately.

3.5 Website and technical information

When you use our website, certain technical information may be collected automatically by our website, hosting, security or analytics providers. This may include:

- internet protocol address;
- browser and device type;
- operating system;
- approximate location derived from an internet protocol address;
- pages visited;
- date and time of access;
- referring website;
- website interaction and performance information; and
- cookie or similar technology identifiers.

3.6 Information obtained from other sources

We may receive relevant professional or business information from:

- your employer or institution;
- a venture, investor, fund or technology transfer office involved in an engagement;
- professional advisers and service providers;
- professional networking platforms;
- publicly available websites and registers; and
- referrals or introductions made by business contacts.

4. How we collect personal information

We may collect personal information:

- directly from you;
- when you complete a website form;
- when you contact us by email, telephone or another communication channel;
- during meetings, workshops or advisory engagements;
- from an institution, company or other party involved in an engagement;
- from service providers acting on our behalf;
- from publicly available sources; or
- automatically through the operation of our website.

Where information is obtained from another source, we will process it only where there is a lawful and legitimate reason to do so.

5. Purposes for which we use personal information

We may process personal information for the following purposes:

- responding to enquiries and requests;
- arranging introductory discussions;
- assessing whether our services are appropriate;
- preparing proposals, quotations and engagement agreements;
- providing governance, commercialisation and portfolio-support services;
- communicating with clients, prospective clients and engagement participants;
- managing contractual and professional relationships;
- preparing reports, meeting records and agreed deliverables;
- administering payments, invoicing, accounting and tax records;
- managing suppliers and professional advisers;
- protecting the security and proper operation of our website and systems;
- improving our website, communications and services;
- maintaining appropriate business and professional records;
- complying with legal, regulatory and contractual obligations;
- establishing, exercising or defending legal rights;
- preventing fraud, misuse or unlawful conduct; and
- sending service information or marketing communications where permitted by law.

We will not use personal information for a purpose that is incompatible with the purpose for which it was originally collected unless the further use is authorised by law or we obtain any additional consent that may be required.

6. Grounds on which we process personal information

Depending on the circumstances, we may process personal information where:

- you have consented to the processing;
- processing is necessary to enter into or perform a contract;
- processing is required to comply with a legal obligation;
- processing protects your legitimate interests;
- processing is necessary for the legitimate interests of SpinOut Advisory or a third party, provided those interests do not unjustifiably infringe your privacy; or
- another lawful basis recognised by POPIA applies.

You may withdraw consent where processing is based on consent. Withdrawal will not affect the lawfulness of processing that occurred before consent was withdrawn.

7. Voluntary and mandatory information

Providing personal information through the general website enquiry form is voluntary.

However, we may be unable to respond to an enquiry, prepare a proposal, enter into an agreement or provide services unless certain information is supplied.

Where the provision of information is legally or contractually required, we will explain this where reasonably practicable.

8. Special personal information and confidential information

The general website contact form is not intended for the submission of:

- health or medical information;
- biometric information;
- criminal information;
- political, religious or philosophical beliefs;
- trade union membership;
- financial-account credentials;
- identity-document copies;
- passwords;
- unpublished patent or invention details;
- confidential technical information; or
- commercially sensitive venture documents.

Please do not submit sensitive, confidential or proprietary information through the general website form.

Where such information is required for a formal engagement, appropriate instructions, confidentiality arrangements and secure communication methods should first be agreed.

SpinOut Advisory is a trading name of Two Oceans Holdings

Registration number 2026/191618/07.

Address: 31 Beach Road, Mouille Point, Cape Town, South Africa, 8005

Mobile : +27 (0)83 4562760 | email: spinoutadvisory@icloud.com

www.spinoutadvisory.co.za

9. Sharing of personal information

We may disclose personal information only where reasonably necessary and lawful.

Recipients may include:

- employees, contractors or consultants authorised to assist SpinOut Advisory;
- website-hosting, cloud-storage, email, communication, security and technology providers;
- accountants, auditors, attorneys and other professional advisers;
- payment, banking or administrative service providers;
- an institution, fund, investor, company or other sponsoring party involved in an engagement, subject to the applicable agreement and confidentiality arrangements;
- regulators, courts, law-enforcement bodies or public authorities where disclosure is required or permitted by law;
- parties involved in a proposed restructuring, transfer or sale of all or part of the business, subject to appropriate confidentiality and legal safeguards; and
- other recipients where you have authorised the disclosure.

Service providers processing personal information on our behalf are expected to use the information only for the agreed purpose and to apply appropriate security and confidentiality measures.

SpinOut Advisory does not sell personal information.

10. Institutional and sponsored engagements

Some SpinOut Advisory services may be commissioned or funded by a sponsoring institution, investor, fund or technology transfer office.

Where this applies:

- the engagement agreement should identify the contracting party;
- the agreed reporting and information-sharing arrangements will be explained;
- information may be included in reports or communications provided to the sponsoring institution where this forms part of the agreed service;
- confidentiality boundaries and escalation obligations may be defined in the engagement agreement; and
- personal information will be limited, where reasonably possible, to what is necessary for the agreed governance, oversight or support purpose.

This Privacy Notice does not override the terms of a specific engagement agreement or confidentiality undertaking.

11. International processing and transfers

Some website, email, cloud-storage, communication or other service providers may store or process information outside South Africa.

Where personal information is transferred outside South Africa, we will take reasonable steps to ensure that the transfer is permitted under POPIA and that the recipient is subject to an appropriate level of protection, contractual safeguards, binding rules, consent or another lawful transfer basis.

12. Retention of personal information

We retain personal information only for as long as reasonably necessary to:

- fulfil the purpose for which it was collected;
- provide services and manage an engagement;
- comply with legal, tax, accounting or regulatory obligations;
- respond to complaints or disputes;
- establish, exercise or defend legal rights; or
- meet legitimate business record-keeping requirements.

Retention periods may differ according to the type of information and the purpose for which it is held.

When information is no longer required, we will take reasonable steps to delete, destroy, anonymise or de-identify it, subject to applicable legal and operational requirements.

13. Security of personal information

SpinOut Advisory applies reasonable and appropriate technical and organisational measures intended to protect personal information against:

- loss or damage;
- unauthorised access;
- unlawful use or disclosure;
- alteration or destruction; and
- accidental or deliberate compromise.

These measures may include access controls, passwords, secure service providers, system updates, backups, confidentiality requirements and appropriate restrictions on access to information.

No method of electronic transmission or storage is completely secure. We therefore cannot guarantee absolute security, but we will take reasonable steps appropriate to the nature of the information and the risks involved.

Where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, we will notify the Information Regulator and affected data subjects as required by applicable law.

14. Cookies and website technologies

Our website may use cookies and similar technologies to:

- enable essential website functions;
- maintain security;
- remember user preferences;
- understand website use and performance; and
- improve the website and user experience.

Essential cookies may be required for the website to function correctly. Analytics, advertising or other non-essential cookies should be used only in accordance with applicable requirements and the choices presented through the website's cookie controls.

You may be able to manage non-essential cookies through the website's cookie settings or through your browser settings. Disabling certain cookies may affect website functionality.

Further information may be provided through a separate Cookie Notice or cookie-preference tool.

15. Direct marketing

We may send electronic marketing communications where:

- you have provided the necessary consent;
- you are an existing client and the communication concerns similar services, subject to applicable legal requirements; or
- another lawful basis permits the communication.

Marketing consent is voluntary and should be separate from the submission of a general enquiry.

Every electronic marketing communication will provide a reasonable means of opting out. You may also request that marketing communications stop by contacting the Information Officer.

Operational communications concerning an enquiry, proposal, contract or active engagement are not treated as marketing communications.

16. Your rights

Subject to POPIA and other applicable laws, you may have the right to:

- ask whether SpinOut Advisory holds personal information about you;
- request access to your personal information;
- request correction or updating of inaccurate or incomplete information;
- request deletion or destruction of information where permitted;
- object to the processing of personal information on reasonable grounds;
- object to direct marketing;
- withdraw consent where processing is based on consent;
- request information about recipients or categories of recipients to whom information has been disclosed;
- lodge a complaint with the Information Regulator; and
- exercise rights available under the Promotion of Access to Information Act 2 of 2000.

Requests should be directed to the Information Officer.

We may need to verify your identity before releasing, correcting or deleting information. Certain rights may be limited where retaining or processing the information is required or authorised by law.

Requests for access to records may also be subject to our PAIA Manual and the procedures prescribed under PAIA.

17. Personal information relating to children

The SpinOut Advisory website and services are intended for professional and business users and are not directed at children.

We do not knowingly collect personal information from children through the website. A parent, guardian or competent person who believes that a child has provided personal information without proper authorisation should contact the Information Officer.

18. Automated decision-making

SpinOut Advisory does not ordinarily use solely automated decision-making that produces legal consequences or has a substantial effect on website visitors, prospective clients or engagement participants.

Should this change, appropriate information and safeguards will be provided as required by law.

19. Third-party websites

Our website may contain links to websites or services operated by third parties.

SpinOut Advisory does not control those websites and is not responsible for their privacy practices, security or content. You should review the privacy notices of third-party websites before providing them with personal information.

20. Changes to this Privacy Notice

We may update this Privacy Notice when our services, systems, legal obligations or processing practices change.

The current version will be published on the SpinOut Advisory website with its effective date and last-updated date. Material changes may also be communicated through an appropriate additional notice.

21. Contacting SpinOut Advisory

Privacy enquiries, objections and requests may be directed to:

Information Officer: Belinda Shaw

Responsible party: Two Oceans Holdings, trading as SpinOut Advisory

Registration number: 2026/191618/07

Telephone: +27 83 456 2760

Email: spinoutadvisory@icloud.com

Address: 502 Seaways, 31 Beach Road, Mouille Point, Cape Town, 8005

22. Complaints to the Information Regulator

You may lodge a complaint with the Information Regulator (South Africa) if you believe that your personal information has been processed unlawfully or that your rights under POPIA have been infringed.

Information Regulator (South Africa)

Woodmead North Office Park
54 Maxwell Drive
Woodmead, Johannesburg

Postal address:

P.O. Box 31533
Braamfontein
Johannesburg
2017

Telephone: 010 023 5200

Toll-free: 0800 017 160

General enquiries: enquiries@inforegulator.org.za

POPIA complaints: POPIAComplaints@inforegulator.org.za