

PRIVACY NOTICE

This Privacy Policy governs the manner in which **Personal Wealth Management (Pty) LTD** ('we', 'our', 'us', 'PWM, the 'company') treats your personal information, collected electronically when you use our digital platforms to apply online for certain products and services, you contact us electronically or you register for one of the services we offer on our digital platforms. The purpose of this notice is to inform PWM clients about the type of personal information the company collects, and the ways in which it is collected, shared, protected, used and stored.

We respect your privacy and your personal information, and for this reason we will take all reasonable measures, in accordance with this Policy, to protect your personal information to keep it confidential, even when you are no longer a member.

We will maintain the confidentiality of your personal information and comply with the Protection of Personal Information, Act 4 of 2013 (POPIA) when processing your personal information.

1. **PWM PRODUCTS AND SERVICES**

PWM provides, amongst others, the following products and services:

LOCAL INVESTMENT ADVISORY	INTERNATIONAL INVESTMENT ADVISORY
Investments	Investments
Endowments	Overseas Trusts and Pensions
Retirement Products	Tax Wrappers
Tax Free Savings	
CORPORATE CASH MANAGER	RISK COVER
Local Treasury Bank Accounts	Death
International Treasury Bank Accounts	Disability
Forex	Dreaded Disease
	Income Protection
ESTATE AND LEGACY PLANNING	FINANCIAL LIFE PLANNING
Wills	Goal Setting
Family Constitutions	Interactive Retirement Planning
Trust Formation	
STRUCTURED PRODUCTS	INVESTMENT PERFORMANCE ANALYSIS
Local	
International	

We will only collect, disclose, collate, process and store (use) your personal information with your express consent, unless we are legally required to do so, and will only use such information for the lawful purpose for which it is required.

We will disclose, in writing, the specific purpose for which we use, request and store your personal information. We will also keep a record of that personal information and the specific purpose for which we collect it.

By accepting the Privacy Policy, you agree to us collecting and processing your personal information, sharing your personal information with our third parties and further processing your information as outlined in this Policy.

2. INFORMATION DISCLOSURE

2.1. What is personal information?

Personal information refers to any information that identifies you or specifically relates to you. Personal information includes, but is not limited to, the following information about you:

- Your marital status (like married, single, divorced), your national origin, your age, your language, birth, education;
- Your financial information, which may include your financial history (like your income or your buying, investing and banking behaviour based on, amongst others, account transactions);
- Your identifying number (like an account number, identity number or passport number);
- Your email address, location information, physical address (like residential address, work address or your physical location), and telephone number (including your cellular number, home landline or office work number);
- Your online identifiers such as social media profiles;
- Your biometric information (like fingerprints, signature or voice);
- Your race and gender;
- Your physical health, mental health, wellbeing, disability, religion, belief, conscience, culture.
- Your medical history (like your HIV/AIDS status and any medical history disclosed or obtained), criminal history, employment history;
- Your personal views, preferences and opinions;
- Your confidential correspondence; and
- Another's views or opinions about you and your name also constitute your personal information.

2.2. What is special personal information

Special personal information is personal information about the following:

- Your religious and your philosophical beliefs (for example where you enter a competition, and you are requested to express your philosophical view);
- Your race (for example where you apply for a product or service where the statistical information must be recorded);
- Your ethnic origin;
- Your political beliefs;
- Your health (for example where you apply for an insurance policy or medical- or health-related products);
- Your biometric information (for example to verify your identity); and
- Your criminal behaviour and alleged commission of an offence (for example to prevent money laundering as required by law).

2.3. What type of personal information does PWM collect?

- Personal information collected by PWM can include, but is not limited to, a data subject's name, contact, birth date, identity number, gender, employment details, source of funds, source of wealth, marital status, policy, bank account, tax number, medical/health information.
- When personal information is collected, PWM will indicate the purpose for the collection and whether the information required is compulsory or voluntary.

2.4. How does PWM collect personal information?

The company collects information either directly from the data subject, the employer or through financial services intermediaries. In certain instances, PWM may collect information from third parties. The source from which personal information was obtained, if not directly from the data subject, will be disclosed.

2.5. When will we process your personal information?

We will only process your personal information for lawful purposes related to our business if the following circumstances apply:

- You have consented thereto;
- A person legally authorised by you, the law or a court, has consented thereto;
- It is necessary to conclude or perform under a contract we have with you;
- The law requires or permits it;
- It is required to protect or pursue your legitimate interest, ours or that of a third party; and
- You are a child, and a competent person (such as a parent or guardian) has consented thereto on your behalf.

2.6. When will we process your special personal information?

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

- If you have consented to the processing thereof;
- If the processing is needed to create, use or protect a right or obligation in law;
- If the processing is for statistical or research purposes;
- If the special personal information was made public by you;
- If the processing is required by law; and
- If racial information is processed and the processing is required to identify you.

2.7. Reasons for processing your personal information

We will process your personal information for any of the following reasons:

- To open, manage and maintain your accounts, contracts, agreements or relationship with us;
- To enable us to deliver goods, documents or notices to you;
- For security and identity verification, and to check the accuracy of your personal information.
- To communicate with you and carry out your instructions and requests;
- For customer satisfaction surveys, promotional and other competitions;
- To invite you to seminars and events
- To enable you to participate in and make use of value-added products and services; or
- For any other related purposes.

2.8. Processing the information of a child

PWM takes the privacy of children very seriously. Children under the age of 18 years should obtain their guardian's consent before providing or submitting any personal information about themselves.

A child is a person who is defined as a child by a country's legislation, and who has not been recognised as an adult by the courts. We process the personal information of children if the law permits this. We will only process the personal information of children if any one or more of the following applies:

- A person with the ability to sign legal agreements has consented to the processing, as the parent or guardian of the child;
- The child's personal information was made public by the child, with the consent of a person who can sign legal agreements;
- The processing is for statistical or research purposes and all legal conditions are met;
- Where the child is an heir in a will, if required to give effect to the will;
- Where the child is a beneficiary of a trust, if required to give effect to the trust deed;
- Where the child is legally old enough to open a bank account without assistance from their parent or guardian; or
- Where the child is legally old enough to sign a document as a witness without assistance from their parent or guardian.

2.9. Obtaining personal information about clients

We collect information about you in the following ways:

- Directly from you;
- Based on your use of our products, services, or service channels (such as our websites and applications);
- Based on how you engage or interact with us, such as on social media, and through emails, letters, telephone calls, and surveys;
- From public sources (such as newspapers); and
- From third parties for the purposes of conducting our business (such as CRM partners, service providers or product suppliers).

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:

- PWM appointed third parties (such as its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy.
- Your spouse, dependants, partners, employer, joint applicant or account holder and other similar sources;
- People you have authorised to share your personal information with, such as a person that makes a travel booking on your behalf, or a medical practitioner for insurance purposes;
- Attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- Payment processing service providers, merchants, banks and other persons that assist with the processing of your payment instructions
- Insurers, brokers, other financial institutions or other organisations;
- Law enforcement and fraud prevention agencies, and other persons tasked with the prevention and prosecution of crime;
- Regulatory authorities, industry ombudsmen, government departments, and local and international tax authorities;
- Trustees, executors or curators appointed by a court of law;
- Our service providers, agents and sub-contractors such as couriers and other persons we use to offer and provide products and services to you;
- Courts of law or tribunals;
- Participating partners, whether retail or online, in our customer loyalty reward programmes.
- Suppliers in the delivery of our wallet and payment services;
- Our joint venture partners;
- Marketing list providers; and
- Digital data transformation or aggregation services which you have authorised to collect activity, health or other digital data streams and share with us.

2.10. Processing information about persons related to a juristic person

If you are a juristic person, such as a company or close corporation, we may collect and use personal information related to the juristic person's directors, officers, employees, beneficial owners, partners, shareholders, clients, authorised signatories, representatives, agents, payers, payees, customers, guarantors, spouses of guarantors, sureties, spouses of sureties, other security providers and other persons related to the juristic person.

If you provide the personal information of a related person to us, you warrant that the related person is aware that you are sharing their personal information with us, and that the related person has consented thereto.

We will process the personal information of related persons as stated in this Privacy Policy, thus references to “you” or “your” in this Privacy Policy will include related persons with the necessary amendments.

2.11. Direct marketing

If you consent, PWM may use your personal or other information to tell you about products, services and special offers from PWM or from third parties for the purposes of conducting our business (such as CRM partners, service providers or product suppliers).

We will use your personal information to market PWM related products and services to you.

- We will do this in person, by post, by telephone, or electronic channels such as SMS, email and other digital channels.
- In all cases, you can tell us to stop sending marketing communications to you at any time.

3. CONFIDENTIALITY AND SECURITY

3.1. Routine precautions

PWM has physical, technological and procedural security safeguards in place and will use its best endeavours to protect your personal information.

Personal information refers to information that identifies or relates specifically to you, which for example include:

- Your name
- Age
- Gender
- Identity number
- Your assets and liabilities
- Your income
- Your tax number
- Your employment details
- Payment records
- Your contact details
- Your marital status
- Family information
- Bank account information
- Medical / health information

In short, any information that we know about you will be regarded as your personal information.

4. YOUR PERSONAL INFORMATION

4.1. Securing personal information

PWM will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. The company will store all the personal information in secured environments, for example on secured servers in a protected data centre.

4.2. How you can review and correct your personal information

You can request to review your personal information contained in PWM's records at any time to correct or update the information. If the purpose for which your personal information was requested initially does not exist anymore, for example you no longer have a contract with us, you may request information held by the company to be removed. However, PWM can decline your request to delete the information from its records if other legislation requires the continued retention thereof or if it has been de-identified.

4.3. Employee training on cyber security and data privacy

Employee training on cyber security and data privacy forms part of ongoing compliance training. Cyber security training is currently further required as a basic compliance training that all employees must complete. As part of the POPIA management programme, there is specific focus on training, awareness as well as communication, that will cover data privacy, data security and more detailed cyber security training as mandatory compliance training for all staff.

4.4. How we use cookies

PWM uses and stores cookies, pixels, and other technologies (collectively, cookies) to recognise your browser or device and provide you with essential features and services, and for additional purposes, including:

- Recognising you when you sign-in to use our services. This allows us to provide you with product recommendations, display personalized content, and notification preferences;
- Conducting research and diagnostics to improve PWM's content, products, and services;
- Preventing fraudulent activity;
- Improving security; and

You can manage browser cookies through your browser settings. The "Help" feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, how to block cookies, and when cookies will expire.

You agree that we will be entitled to send cookies from this website to your computer. We use the word cookie to refer to information that is sent from this website to your hard drive, where it is saved. It contains information to personalise your experience on this website. In this way, the next time you use this website we will know who you are and that you have visited this website before.

4.5. Third parties

We do not exercise control over affiliate parties' privacy policies (personal information and third parties). Because we are not responsible for any representations, information, warranties or content on any website of an affiliate party (including websites linked to this website or websites facilitated by us), we do not exercise control over affiliate parties' privacy policies, and you should refer to the privacy policy of any such affiliate party to see how such party protects your privacy.

4.6. Sharing your information

PWM will only share your personal information with third parties if you have consented to such disclosure. If consent has been obtained, the company may share your personal information with persons or organisations within and outside of PWM.

Where PWM discloses personal information to other financial institutions, insurers or any other third parties, the third parties will be obliged to use that personal information only for the reasons and purposes it was disclosed for.

PWM may be obliged to disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, or for the purposes of protecting the interest of its clients, for example, fraud prevention or to give effect to an agreement.

Your privacy is important to us. We will therefore not sell, rent or provide your personal information to unauthorised entities or other third parties, for their independent use, without your consent.

We may disclose your personal information to the following third parties:

- Selected third parties to provide us with services, including companies that provide us with technical support and assistance in respect of the website, companies that provide back-office services, companies that provide hosting services or, that track the website's activities and analytics, and companies engaged to conduct research on our behalf;
- Professional advisers, judicial, regulatory and law enforcement bodies;
- A third party that acquires all or part of our assets or shares, or that succeeds us in carrying on all or a part of our business, whether by merger, acquisition, re-organisation or otherwise;
- In order for us to ensure that we meet your needs, we may collect and analyse your personal information and combine all the information that we have about you to compile a profile of you for us to personalise and tailor our services to meet your specific needs; and
- Once we have collected and analysed your personal information, we may send you promotional material or details which we think may be of interest to you. If any of this promotional information relates to products, promotions, news or services of an affiliate party, and if you indicate that you would like more details, we may inform the affiliate party to contact you directly. We will, however, only inform an affiliate party to contact you directly if you have indicated that you agree.

If at any stage, after you have given us your consent, you no longer wish for us to use or share your personal information with an affiliate party, you may withdraw your consent at any stage. By choosing to withdraw your consent to affiliated third parties there may be an impact on our offering to you, and it will be explained to you on your request to withdraw your consent.

4.7. Cross border sharing

We will only transfer your personal information to third parties in another country under 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;
- Where it is not reasonably practical to obtain your consent, and the transfer is in your interest.

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.

5. CHANGES TO PRIVACY POLICY

5.1. Perusing amendments to the policy and our right to amend this Privacy Policy

We reserve the right, in our sole discretion to amend (including without limitation, by the addition of new terms and conditions) this Privacy Policy from time to time. You agree to review the Privacy Policy whenever you visit this website for any such amendments. Save as expressly provided to the contrary in this Privacy Policy, the amended version of the Privacy Policy shall supersede and replace all previous versions thereof.

5.2. Which laws apply?

This Privacy Policy will be governed by and construed and interpreted in accordance with the laws of South Africa. To the extent that a court has jurisdiction over any dispute which may arise out of or in connection with this Privacy Policy, we both submit to the jurisdiction of the South African courts.

6. QUESTIONS REGARDING PWM'S PRIVACY POLICY

If you have any questions about this notice or PWM's treatment of your personal information, send an email to info@pwminvest.co.za