

THE PROTECTION OF PERSONAL INFORMATION ACT CUSTOMER PRIVACY NOTICE Privacy Policy

Document History

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30-06-2021	1	R. Venter	Implemented

Document Governance and Owner

Implementation	
Effective Date	Immediate
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Owned by	HR

1. Definitions

For the purposes of this Privacy Policy:

Client means the individual accessing or making use of our services, or the company, or other legal entity on behalf of which such individual is accessing or making use of our services, as applicable.

Company (referred to as either "the Company", "FSP" in this Policy) refers to Capitor Advisors (South Africa) (Pty) Ltd. with registered address, 514 Valderrama, Somerset Links Office Park, De Beers Avenue, Somerset West, 7140

Cookies are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.

Country refers to: South Africa

Device means any device that can access the Service such as a computer, a cell phone or a digital tablet.

Personal Data is any information that relates to an identified or identifiable individual.

Service refers to the list of services listed in Principle 3 of the Policy.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analysing how the Service is used.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to Capitor Advisors (South Africa) (Pty) Ltd. accessible from www.capitor.co

2. Personal Data

In order to make use of the Service and in order for the FSP or Advisor to render advise or intermediary services accurately the client may have to provide certain personally identifiable information that can be used to contact or identify. Personally, identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number

- Address, Postal code, City, Province

Collecting and Using Personal Data

3. Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **For the performance of a contract:** the development, compliance and undertaking of the contract for the products, items or services purchased by the client or of any other contract with the FSP through the Service.
- **To contact:** To contact the Client by email, telephone calls, SMS, or other equivalent forms of electronic communication, regarding updates or informative communications related to the products, services and the client portfolio, contracted services, when necessary or reasonable for their implementation.
- **To provide the client:** With news, special offers and general information about other goods, services and events which offered by the Company which are similar to those that have already purchased or enquired about unless the client has opted not to receive such information.
- **To manage clients' request:** To attend and manage the clients' requests and instructions.
- **For other purposes:** The FSP may use client information for other purposes, such as data analysis, identifying trends, determining the effectiveness of promotional campaigns and to evaluate and improve the Service, products, services, marketing and client experience.

Transfer of Personal Data

4. Transfer of Personal Data

Client information, including personal data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of South Africa or other governmental jurisdiction where the data protection laws may differ than those from South Africa.

The clients consent to this Privacy Policy followed by submission of such information represents agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that data is treated securely and in accordance with this Privacy Policy and no transfer of personal data will take place to an organization or a country unless there are adequate controls in place including the security of such data and other personal information.

5. Legal requirements

The Company may disclose personal data if such action is necessary to comply with a legal obligation such as:

- Required by the Financial Intelligence Centre
- Required by the Financial Services Conduct Authority
- Required by SAPS
- Required by the South African Reserve Bank
- Required by South African Revenue Services
- Required by a Court of Law

6. Security of Your Personal Data

The FSP will take every reasonable measure to keep data protected however, no method of transmission over the Internet, or method of electronic storage is 100% secure. While the FSP strives to use commercially acceptable means to protect personal data, absolute security cannot be guaranteed.

7. Children's Privacy

The FSP does not undertake any business which addresses any person under the age of 18.

Principle 1: Accountability

- The FSP must take reasonable steps to ensure that personal information obtained from clients is stored safely and securely.
- This includes contact details, health and medical details for the purposes any medical underwriting, financial information, any information required under the FIC regulations and any other personal information that may be obtained for the purpose of providing its services to the client.

Principle 2: Processing limitation

- The FSP will collect personal information directly from clients.
- The FSP will only process or release client information with their consent, except where it is required to do so by law.

Principle 3: Specific purpose

- The FSP collects personal information from clients to enable to represent them to our clients for the purpose of rendering its services.

Principle 4: Limitation on further processing

- Personal information may not be processed further in a way that is incompatible with the purpose for which the information was collected initially. The FSP collects personal information for the purpose of rendering financial services, and it will only be used for that purpose.

Principle 5: Information quality

- Capitor Advisors (South Africa) (Pty) Ltd. is responsible for ensuring that client information is complete, up to date and accurate before it is used. This means that it may be necessary to request clients, from time to time, to update their information and confirm that it is still relevant. If Capitor Advisors (South Africa) (Pty) Ltd. is unable to reach a client for this purpose their information will be deleted from records FIVE years after the termination of the business relationship as per the requirements of the FAIS Act.

Principle 6: Transparency/openness

- In the instance that personal information is collected from a source other than directly from a client, (E.g., credit checks, AML checks, Astute checks, other portals) The client will be made aware:
 - That their information is being collected
 - Who is collecting their information by giving them our details;
 - Of the specific reason that you are collecting their information.

Principle 7: Security safeguards

- The FSP will ensure technical and organisational measures to secure the integrity of personal information, and guard against the risk of loss, damage or destruction thereof. Personal information must also be protected against any unauthorised or unlawful access or processing. Capitor Advisors (South Africa) (Pty) Ltd. is committed to ensuring that information is only used for legitimate purposes with client consent and only by authorised employees and third parties which have been disclosed.

Principle 8: Participation of individuals

- Clients are entitled to know particulars of their personal information held by the FSP as well as the identity of any authorised employees that had access thereto. They are also entitled to correct any information held by the FSP.

Changes to this Privacy Policy

The FSP may update its Privacy Policy from time to time.

Clients are advised to review this Privacy Policy periodically for any changes.

Contact Us

Any questions about this Privacy Policy, please contact:

- By visiting this page on our website: www.capitor.co