

## **PRIVACY POLICY**

### **Introduction**

We at Custodian Wealth Management (Pty) Ltd (Custodian Wealth) FSP46150 respect your right to privacy.

Where we refer to “personal information”, it means “personal information” as defined in the Protection of Personal Information Act, 4 of 2013 (“**POPIA**”), and “personal data” as per the General Data Protection Regulation 2016/679 (“**the GDPR**”). Personal information includes any information about a person that can be used to identify a person directly or indirectly. It includes information like a name, an identification number, location information, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

POPIA includes the personal information of juristic persons in its ambit – so we will protect the personal information of juristic persons in the same manner as any other person’s personal information.

Where applicable, this privacy policy applies in addition to any other agreement that you enter into with us, including the letter of engagement that you agree to when you become our client.

For any comments or queries relating to this policy, please contact our Information Officer, Mr. Samuel Robson at [sam@custodianweath.co.za](mailto:sam@custodianweath.co.za).

### **The personal information we collect**

We collect, amongst others, the following personal information:

- personal details, such as your name, email address or telephone number;
- billing information, such as relevant payment information and VAT registration number; and
- legally required information, which includes any additional information that the law requires from us to verify your identity.

### **How we collect personal information**

- Directly from you when you use our website or any of our services or if we request it from you.
- In limited instances, we collect personal information from third parties. We will only collect personal information this way where such information is publicly available or for legitimate business purposes.
- Through the use of cookies, which will mainly be used to identify visitors that return to our website. You can prevent us from doing this through a setting on your browser. Cookies only store information from your browser and cannot access data on your computer.

## **Use of your personal information**

We may use your personal information for any legitimate business purposes relating to our services and/or business activities. Some of the purposes for which we use your personal information include:

- responding to your queries posted on our website or emailed to us;
- onboarding you as a client and verifying your identity (as required by law);
- providing you with our services;
- referring you to other service providers with your consent;
- improving our website and services by analysing certain information collected, including cookies and other related information;
- sending you information (in the form of our newsletter) and inviting you to events; and/or
- complying with our regulatory or other obligations.

## **Marketing**

When you become a client, you will be added to our mailing list. We use this mailing list to send you important information about our business, the services we offer, legal developments, news and event invitations. You can also add yourself to our mailing list on our website.

You can unsubscribe from our mailing list at any time which will result in us no longer marketing to you. We include a link in every marketing communication allowing you to unsubscribe from marketing communication and you can email us to ask us to remove you from our mailing list.

If you unsubscribe from our mailing list, we may still contact you in other instances, such as in the course of providing you with services or to collect outstanding fees. In these instances, the relevant practitioner will contact you directly and not through the mailing list.

## **Sharing your personal information?**

We will only share your personal information for purposes of providing services to you or any other legitimate business purpose relating to our business activities, including but not limited to, the protection of our or your rights, complaints, marketing, or enforcing any agreement between us.

Where required for our business operations, we may share your personal information with our service providers. We only share information with service providers after we enter into an agreement with the service provider to regulate the way in which the personal information will be secured.

Where the law requires us to do so, we may also share your personal information with third party service providers, agents, contractors, employees, law enforcement agencies or business affiliates. We will only share your personal information in these instances where it is necessary for us to do so and only to the extent that your personal information is needed for such third parties to perform their services or obligations.

## **Will we send your personal information trans-border?**

We may transfer your information cross border for our legitimate business purposes, such as for cloud storage and for our billing practices. All information transfers will comply with the applicable laws.

## Security

We will take all reasonable steps to ensure that your personal information is protected. We protect and manage personal information that we hold about you by using electronic and computer safeguards like firewalls, data encryption, and physical and electronic access control to our buildings. We only authorise access to personal information to those employees who require it to fulfil their designated responsibilities.

## Links on our website

We may include links to other third-party websites which do not fall under our supervision. We cannot accept any responsibility for your privacy or the content of these websites, but we display these links to make it easier for you to find information about specific subjects.

## Right to object

You may, on reasonable grounds, object to us using your personal information. If you object, we will stop using your personal information, except if the law allows its use.

## Lodging a complaint

If you believe we are using your personal information unlawfully, please let us know first (on [info@custodianwealth.co.za](mailto:info@custodianwealth.co.za) or (+27) 087 353 2596). You may lodge a complaint to the Information Regulator (South Africa) with the following contact details:

- Website: <https://www.justice.gov.za/infoereg/index.html>.
- Address: SALU Building, 316 Thabo Sehume Street, Pretoria.
- Contact number: 012 406 4818.
- Fax number: 086 500 3351.
- Email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za).

If you are in the European Union or the United Kingdom, the following details may be used for the relevant regulatory authority.

GDPR	The European Commission	Online complaint procedure: <a href="https://ec.europa.eu/info/about-european-commission/contact/problems-and-complaints/how-make-complaint-eu-level/submit-complaint_en">https://ec.europa.eu/info/about-european-commission/contact/problems-and-complaints/how-make-complaint-eu-level/submit-complaint_en</a> Address: European Commission, Secretary-General B-1049 Brussels, BELGIUM Fax: 3222964335
------	-------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	The independent Data Protection Authority (“DPA”) per member state	Website listing all DPA’s per member state: <a href="https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm">https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm</a>
Data Protection Act, 1998 (UK)	The Information Commissioner’s Office	Website: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a> Tel: 0303 123 1113

## Children’s personal information and special personal information

We do not intentionally collect or use personal information of children (persons under the age of 18 years), unless with express consent of a parent or guardian or if the law otherwise allows or requires us to process such personal information.

## Quality and access to your personal information

We want to ensure that your personal information is accurate and up to date. You may ask us to correct any personal information that you think is inaccurate or request us to remove your information by sending an email to [info@custodianwealth.co.za](mailto:info@custodianwealth.co.za).

You have the right to request us to provide you with personal information that we hold about you. You must contact us directly to do so or send an email to [info@custodianwealth.co.za](mailto:info@custodianwealth.co.za).

## Retention of Information

We retain personal information in accordance with the required retention periods in law or for legitimate business purposes. We may keep personal information indefinitely in a de-identified format for statistical purposes. This privacy policy also applies when we retain your personal information.

## Security breach

We will report any security breach to the Information Regulator and to the individuals or companies involved. If you want to report any concerns about our privacy practices or if you suspect any breach regarding your personal information, kindly notify us by sending an email to [info@custodianwealth.co.za](mailto:info@custodianwealth.co.za).