



# PRIVACY POLICY

VERSION 2.00

THE PRIME FINANCIAL SERVICES GROUP

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2060



**CONTENTS**

**1. APPLICATION OF THE POLICY ..... 2**

**2. PURPOSE OF THE POLICY ..... 2**

**3. WHAT PERSONAL INFORMATION DO WE COLLECT? ..... 2**

**4. WHY DO WE COLLECT YOUR PERSONAL INFORMATION? ..... 2**

    COLLECTING INFORMATION ..... 2

    PROCESSING INFORMATION ..... 2

**5. WHAT WE DO WITH YOUR PERSONAL INFORMATION ..... 3**

**6. PERSONAL INFORMATION OF CHILDREN ..... 3**

**7. WE SEND YOUR INFORMATION TO OTHER COUNTRIES ..... 3**

**8. WE DON'T KEEP YOUR INFORMATION FOR LONGER THAN WE NEED ..... 3**

**9. WE HAVE TAKEN REASONABLE STEPS TO MINIMISE THE IMPACT OF A BREACH ..... 4**

**10. YOUR RIGHTS ..... 4**

**11. BREACHES ..... 4**

**12. MISCELLANEOUS ..... 4**

**13. CHANGES TO THIS POLICY ..... 4**

**14. CONTACT US ..... 5**

**ANNEXURE 1 – OWNERSHIP, APPROVAL & REVISION HISTORY ..... 6**

POLICY OWNER ..... 6

POLICY APPROVAL ..... 6

POLICY REVISION ..... 6

## **1. APPLICATION OF THE POLICY**

- 1.1 This policy is applicable to the legal entities within the Prime Financial Services Group (hereinafter referred to as “the Group”), as shown on the Group’s corporate organogram and amended from time to time.

## **2. PURPOSE OF THE POLICY**

- 2.1 We are big on privacy. That is why we actively seek to protect the privacy and confidentiality of your personal information. This policy covers how we as the data controller collect, process and use personal data under the Personal Information Act (“POPIA”) and the General Data Protection Regulation (“GDPR”).
- 2.2 During the course of our interactions, you share personal information with the Group. This privacy notice may form part of your application process with the Group or related third parties.
- 2.3 This policy tells you what to expect when we collect and use your information. We may need to update it periodically, but we will inform you when we do. You should read this notice along with the terms and conditions that apply to the specific products and services you use.

## **3. WHAT PERSONAL INFORMATION DO WE COLLECT?**

- 3.1 We collect and process your personal and financial information - this includes your:
- i. Name, Surname and Title (so that we know who you are and how to address you)
  - ii. Identity or Passport number and Date of Birth (so that we can avoid duplications on our system)
  - iii. E-mail address and contact details (so that we can communicate with you)
  - iv. Physical and Postal Address (for CRS & FATCA purposes)
  - v. Beneficiaries and/or your Dependents (if applicable)
  - vi. Banking Details (if applicable)
  - vii. Tax Information (locally and foreign in terms of FATCA and CRS)

## **4. WHY DO WE COLLECT YOUR PERSONAL INFORMATION?**

- 4.1 We collect your personal information to enable us to provide you with access to the products and services you have requested. The type of information we collect will depend on the purpose for which it is collected and used. Therefore, we either enter into an agreement with you or accept a mandate from you authorising us to provide these services to you and on your behalf.

### **COLLECTING INFORMATION**

- 4.2 We collect your personal information by:
- i. Processing your application forms
  - ii. Processing any subsequent instructions submitted to us
  - iii. Communicating with you on matters pertaining to your investment
  - iv. Providing you with further information, which may include but not be limited to quarterly investment statements, annual tax certificates (where applicable), transaction confirmations etc.

### **PROCESSING INFORMATION**

- 4.3 We process your information when:

- i. It is in your legitimate interest to do so, or when you give us permission.
- ii. When you contact us by e-mail or telephone with a query, complaint or request, we collect the information included in your message. We use the information we collect to reply to, investigate and resolve your query, complaint or request.
- iii. When you visit our website, we use cookies to optimise the website experiences when you login into our website portal (this currently only applies to our brokers). We collect standard information about your internet connection and website use. We use this information to help us improve our website and online services. The type of information we collect includes the URL you came from, IP address, domain type, browser type, the country and telephone code where your device is located, the web pages viewed during your visit, the links on which you clicked, and any search terms you entered on our website (user information).

## **5. WHAT WE DO WITH YOUR PERSONAL INFORMATION**

- 5.1 We do not sell, rent or trade your personal information with anyone. We only use it for the purposes for which it was collected and agreed (appropriate in the normal course of business to provide the products and services you have requested).
- 5.2 We have to share it with our trusted service providers and third parties who are involved in the delivery of products or services, giving effect to the terms of our agreement. We have agreements in place with the recipients to ensure that they also comply with applicable privacy and confidentiality laws.
- 5.3 And lastly, we may disclose your personal information where we have a duty or a right to disclose in terms of law or other industry codes, or where we believe it is necessary for pursuing our legitimate interests or that of a third party to whom your personal information is supplied.

## **6. PERSONAL INFORMATION OF CHILDREN**

- 6.1 We do not knowingly collect personal information of children without the consent of a parent or guardian. If you are younger than 18 years old, we will always ask for consent to process your personal information from your parent or guardian.

## **7. WE SEND YOUR INFORMATION TO OTHER COUNTRIES**

- 7.1 Some of the service providers that we use are located in other countries, for example our service provided TAU's second back-up storage service providers are located in Ireland. If we send information to anyone who is located in a country that does not have the same level of protection of personal information as South Africa or the European Union, we require that they undertake to protect the personal information of our customers to the same level that we do.

## **8. WE DON'T KEEP YOUR INFORMATION FOR LONGER THAN WE NEED**

- 8.1 We will not retain your personal information for longer than is necessary for the purpose for which it was collected or processed. The period for which we retain your personal information is influenced by:
  - i. any compliance requirement in terms of legislation
  - ii. the retention of personal information for scientific, historical or statistical purposes
  - iii. for the establishment, exercise or defence of legal claims
- 8.2 You can request to have your information deleted. However, we may not be able to comply with your request if we are under a legal obligation to retain the information.

## **9. WE HAVE TAKEN REASONABLE STEPS TO MINIMISE THE IMPACT OF A BREACH**

- 9.1 We have implemented reasonable security measures based on the sensitivity of the information we hold. These measures are in place to protect the information from being disclosed, from loss, misuse and unauthorised access, and from being altered or destroyed.
- 9.2 We regularly monitor our systems for possible vulnerabilities and attacks, but no system is perfect and we cannot guarantee that we will never experience a breach of any of our physical, technical or managerial safeguards. If something should happen, we have taken steps to minimise the threat to your privacy. We will let you know of any breaches which affect your personal information and inform you how you can help minimise the impact.
- 9.3 Basically, we take every reasonable step to protect your personal information, but we cannot guarantee the security of any information you transmit to us electronically and you do so at your own risk.

## **10. YOUR RIGHTS**

- 10.1 You have the right to be informed about the personal information we have, and what we do with it and to request a copy of the personal information which we have on record of you.
- 10.2 You have the right to:
- i. ask us what we know about you.
  - ii. ask what information was sent to our suppliers, service providers or any other third party.
  - iii. ask us to update, correct or delete any out-of-date or incorrect personal information we hold about you.
  - iv. receive all of the information we have about you and to transfer it to another service provider.
  - v. unsubscribe from any direct marketing communications we may send you.
  - vi. object to the processing of your personal information.
- 10.3 You can request access to the information we hold about you or correct your personal information by contacting our Information Officer at the below email address.

## **11. BREACHES**

- 11.1 We will deal with any breaches of personal data held by us in line with our Data Protection Policy, which breached includes accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

## **12. MISCELLANEOUS**

- 12.1 This policy is governed by and shall be construed in accordance with the laws of the Republic of South Africa. This policy is written in the English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this policy, the English version shall prevail.

## **13. CHANGES TO THIS POLICY**

- 13.1 We reserve the right to amend this policy from time to time to reflect changing legal requirements or our processing practices.

## **14. CONTACT US**

- 14.1 If you have any questions or do not understand anything in this Policy, please send an email to [POPIA@globaladmin.co.za](mailto:POPIA@globaladmin.co.za).

## ANNEXURE 1 – OWNERSHIP, APPROVAL & REVISION HISTORY

### POLICY OWNER

The Privacy Policy is owned and maintained by the Corporate Governance Department.

### POLICY APPROVAL

The policy document was reviewed and approved by the Group’s Risk and Audit Committee on the 26<sup>th</sup> of May 2023 and formally ratified by management at the next board meeting of the holding company, Prime Financial Services (Pty) Ltd.

### POLICY REVISION

Detailed below is a list of policy versions and the changes/amendments/additions made to the policy with each new version:

DATE	VERSION	CHANGES
Dec 2013	1.00	“Privacy” policy established.
Aug 2014	1.01	- Complete format overhaul - Applicable Group entity breakdown included
Aug 2014	1.02	- Inclusion of “Customer Rights” - Inclusion of “Personal Information” - Inclusion of “Commitment to POPIA”
Aug 2015	1.03	- Inclusion of Prime Alternative Investments (Pty) Ltd in Group structure
Aug 2015	1.04	- Inclusion of PAI Holdings and Prime Asset Management (Pty) Ltd in Group structure. - GAA’s name is changed to Ascent Capital (Pty) Ltd.
Nov 2015	1.05	- Removal of the Unclaimed Retirement Funds from the Group structure. - Inclusion of Annexure A: Revision History
Sep 2016	1.06	- Global Employee Benefits (Pty) Ltd included in Group structure. - Inclusion of “Associates” in Group Structure. Policy reworded to make reference to both the Group and Associates where applicable. - Group structure amended to refer to “Prime Collective Investment Schemes Management Company (RF) (Pty) Ltd” and “Prime Alternative Investments (RF) (Pty) Ltd”. - Header formatting.
Aug 2017	1.07	- Global Financial Administrators (Pty) Ltd included in Group structure. - Global Investment Administrators (Pty) Ltd. included in Group structure. - Global Payroll Services (Pty) Ltd included in Group structure. - Global Nominees (Pty) Ltd - Ascent Capital (Pty) Ltd reclassified as an Associate company. - Numbering & format changes throughout document.
Nov 2017	1.08	- Format changes. - Prime Real Estate (Pty) Ltd. included in Group structure. - Prime Trade Finance (RF) (Pty) Ltd included in Group structure. - Unclaimed Funds included in Group structure. - Orca Global Advisory (Pty) Ltd. included as an Associate. - Annexure A amended to Annexure 1.
Dec 2017	1.09	- Ascent Capital (Pty) Ltd reclassified as a Group company.
Apr 2018	1.10	- Group name amended to “Prime Financial Services Group” - Prime Trade Finance (RF) (Pty) Ltd removed as a Group company. - Mashamba Asset Managers (Pty) Ltd removed as an Associate company. - Orca Global Advisory (Pty) Ltd removed as an Associate company. - Dormant companies removed from Group structure.

Dec 2019	1.11	<ul style="list-style-type: none"><li>- Address updated.</li><li>- Format updated.</li><li>- New heading “Application of the Policy” updated.</li><li>- List of applicable companies amended.</li></ul>
Jun 2020	1.12	<ul style="list-style-type: none"><li>- Policy reworked in its entirety and simplified.</li></ul>