

# Privacy and Cookie Notice

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## 1. AUDIENCE

1.1 This notice applies to you if you are:

1.1.1 a visitor to our websites:

1.1.1.1 [www.sasfin.com](http://www.sasfin.com);

1.1.1.2 <https://www.sasfin.com/wealth/>;

1.1.1.3 [wealth.sasfin.com](http://wealth.sasfin.com); and

1.1.1.4 the SWIP platform available at <https://wealth.sasfin.com/Portal/SWIPFNA>. (“the **Websites**”); or

1.1.2 where applicable, a prospective and/or current customer or client of Sasfin.

## 2. WHAT IS PERSONAL INFORMATION?

2.1 “**Personal Information**” has the definition set out in the Protection of Personal Information Act 4 of 2013, that is, information which relates to you as an identifiable natural person or juristic person, including, but not limited to:

2.1.1 information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

2.1.2 information relating to the education or the medical, financial, criminal or employment history of the person;

2.1.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;

2.1.4 the biometric information of the person; and

2.1.5 the personal opinions, views or preferences of the person.

2.2 Personal Information excludes:

2.2.1 information that has been made anonymous so that it does not identify a specific person;

2.2.2 permanently de-identified information that does not relate or cannot be traced back to a person specifically;

2.2.3 non-personal statistical information collected and compiled by us; and

2.2.4 information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and is not subject to protection under this notice).

2.3 “**Sasfin**” means Sasfin Holdings Ltd and its subsidiaries as well as any subsidiary of its subsidiaries and their subsidiaries with registered physical address at 140 West Street, Sandown, Sandton, 2196.

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

3.1 Personal Information you provide to Sasfin on a voluntary basis:

3.1.1 The Personal Information we collect and process may include, but is not limited to:

3.1.1.1 lists of the products and services in which you express an interest when you use the Websites;

3.1.1.2 your name, identity number, passport number, contact information, postal address, street address and email address, company registration number and VAT number which you may submit to us when you interact with the Websites;

3.1.1.3 information regarding your personal or professional interests, demographics, experiences with our products and contact preferences;

3.1.1.4 your contact information when you apply for a position through our recruitment portal (such Personal Information may include your name, identity or passport number, email address, physical address, telephone numbers, information relating to your occupation, gender and any documentation required for purposes of recruitment); and

3.1.1.5 all your relevant details for purposes of an application for one of our products or services.

3.2 We may from time-to-time source your Personal Information from external sources or third parties in order to discharge our contractual obligations, fulfil your account, provide services and information to you as we reasonably think appropriate and for any other purposes set out in this notice.

- 3.3 We may also collect minor (persons under the age of 18) and special Personal Information depending on the services that you require. Special Personal Information may include but is not limited to demographic, religious, medical, criminal and employment information.
- 3.4 Information Sasfin automatically collects about you:
- 3.4.1 When you use Sasfin's Websites, Sasfin may automatically collect and store certain information about you. This includes, but is not limited to the following:
- 3.4.1.1 technical information, including your Internet Protocol (IP) address which is used to connect your computer to the internet, operating system and browser type and platform for system administration; and
- 3.4.1.2 information about your use of our Websites including details of your visits such as pages viewed and the resources that you accessed. Such information includes traffic data, location data and other communication data.
- 3.5 When you respond to direct marketing from Sasfin, we collect your publicly available information.
- 3.6 When you request our services, you may be asked to provide us with additional information.
- 3.7 We strive to collect only that Personal Information which is necessary for the intended purpose of the collection.
- 3.8 We will use this Personal Information to fulfil your account, provide services and information to you as we reasonably think appropriate and for any other purposes set out in this notice.
- 3.9 If you do not provide us with your Personal Information it will hinder our ability to fulfil our contractual obligations to you and may place us at odds with our compliance with applicable financial services legislation.

#### **4. USE OF YOUR PERSONAL INFORMATION**

- 4.1 We are required to process your Personal Information, in line with legislation relating to data protection, including the Protection of Personal Information Act 4 of 2013, to ultimately discharge our contractual obligations to you. Ordinary Personal Information and sometimes special and minor Personal Information may be processed. Any such Personal Information is provided by you on a voluntary basis.

4.2 In particular we may use your Personal Information for the following reasons:

- 4.2.1 to provide you with services you have requested and notify you about important changes or developments to these services;
- 4.2.2 to provide you with further information about our products and services;
- 4.2.3 to respond to your inquiries and/or complaints or process your requests in relation to your information;
- 4.2.4 to follow up as part of our customer services procedures;
- 4.2.5 to update our records about you;
- 4.2.6 for internal record keeping;
- 4.2.7 to contact you for market research purposes and/or administer offers to you;
- 4.2.8 to improve our products and services;
- 4.2.9 for fraud prevention and detection, and to comply with applicable laws and regulations;
- 4.2.10 in relation to competitions and other promotions;
- 4.2.11 to evaluate the effectiveness of our marketing and for research, training and statistical analysis with the aim of improving our services; and
- 4.2.12 to make our Websites easier for you to use and to provide you with access to certain parts of the Websites.

4.3 We will not retain your Personal Information for longer than is necessary to achieve the purpose for which we collected it and we will delete or de-identify Personal Information, unless there is a lawful basis or legal requirement for us to retain your Personal Information for a longer period.

## 5. SHARING YOUR PERSONAL INFORMATION

5.1 We may disclose your Personal Information to the following third parties:

5.1.1 other companies in Sasfin;

5.1.2 selected third parties to provide us with services that assist or enable us to carry out actions for the conclusion or performance of our contractual obligations to you, including companies that provide us with technical support and assistance in respect of the Websites, companies that provide back-office services, companies that provide hosting services or that track the Websites' activities and analytics, and companies engaged to market and distribute Sasfin products and/or services;

5.1.1 professional advisers, judicial, regulatory and law enforcement bodies.

5.2 We require that our service providers take appropriate, reasonable, technical and organisational measures to keep your Personal Information secure.

5.3 In addition, our service providers may not use or disclose Personal Information for any purpose other than providing the services on our behalf.

5.4 We may also disclose your Personal Information if we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation.

## 6. SAFEGUARDING OF YOUR PERSONAL INFORMATION

6.1 We will take all appropriate, reasonable, technical and organisational measures to safeguard your Personal Information to prevent loss of, damage to or unauthorised destruction of your Personal Information or unlawful access to or processing of your Personal Information.

6.2 We only authorise access to Personal Information for those employees who require said access to fulfil their responsibilities and/or perform their duties.

6.3 We implement disaster recovery procedures where appropriate.

## 7. USE OF COOKIES

- 7.1 Our Websites use cookies to improve your browser experience.
- 7.2 First party cookies contain a randomly generated number and allows the browser to remember your selections. It expires when you close the browser and contains no Personal Information.
- 7.3 Third party cookies are used to collect anonymous statistics from our Websites such as the number of visitors in a month, average duration of visits and popular pages viewed. This data is used to review and improve our Websites.

## 8. TRANSFER TO ANOTHER COUNTRY

We may transmit or transfer Personal Information outside of the country in which it was collected to a foreign country and process it in that country. Personal Information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting Personal Information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your Personal Information in a foreign country whose laws regarding processing of Personal Information may be less stringent.

## 9. ACCESSING YOUR PERSONAL INFORMATION

- 9.1 You may request details of your Personal Information that is held by us under the Promotion of Access to Information Act, 2 of 2000. Fees to obtain a copy or a description of your Personal Information are prescribed in terms of the aforementioned Act.
- 9.2 Confirmation of whether or not we hold Personal Information about you may be requested free of charge.
- 9.3 If you would like to obtain a copy of your Personal Information held by Sasfin, please review our Promotion of Access to Information Act Manual located at [www.sasfin.com/regulations](http://www.sasfin.com/regulations).
- 9.4 You may request access to any of your Personal Information that is held by us at any time and for any purpose, including to request that we correct your Personal Information if it is inaccurate or delete or de-identify the Personal Information if we are no longer required to retain it by law or for a legitimate purpose.
- 9.5 Requests to access your Personal Information in accordance with this notice can be made to [privacy@sasfin.com](mailto:privacy@sasfin.com).
- 9.6 You have the right to object to the processing of your Personal Information in addition to the right to lodge a complaint with the Information Regulator via email at [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za).

## 10. ACCEPTANCE

10.1 You must accept all the terms of this notice when you request our services. If you do not agree with anything in this notice, then you may not request our services.

10.2 You may not access our Websites or request our services if you are younger than 18 years old or do not have the legal capacity to conclude legally binding contracts.

10.3 By accepting this notice, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

10.4 You may only send us your own Personal Information or the information of another data subject where you have their written permission to do so.

## 11. CHANGES

We may change the terms of this notice at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the Websites or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the Websites and our services. If you continue to use the Websites or our services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.