

As a Responsible Party in terms of the Protection of Personal Information Act 4 of 2013 'POPIA', we understand that your personal information is important to you and that you may be apprehensive about disclosing it at times. Your privacy is just as important to us and we are committed to safeguarding and processing your information in a safe and lawful manner. This privacy notice provides you with information about how and why we use your personal information and how we keep it secure. It also sets out your rights under law, our responsibilities to you and how you can contact us.

Who we are

Wealth Preservation Strategies (Pty) Ltd is an authorised Financial Service Provider, offering independent financial advice and intermediary services to individuals, families, employers and businesses.

Registered name	Wealth Preservation Strategies (Pty) Ltd
Registration number	97-09087-07
FSCA License number	14577
Physical address	6 th Floor, Mariendahl House, Newlands on Main, Main Road, Newlands, 7700.
Telephone	+27 (0)21 447 1224
E-mail	management@wealthps.co.za

In this notice, we refer to ourselves collectively as 'WPS, 'we', 'us' and 'our'.

Our appointed Information Officer

If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer. We have registered our Information officer with the Information Regulator (SA).

Full names:	Mark Cliff
Contact:	+27 (0)21 447 1224
Email:	compliance@wealthps.co.za

Personal information we may hold about you

As with other authorised financial service providers, we collect personal information about you. The extent to which your information is processed will depend on which of our services you engage and which corresponding financial products you wish to participate in.

The gathering of your personal information forms the foundation of our six-step financial planning process. We will tell you when the personal information requested is mandatory, or if it is voluntary. If you do not provide personal information that is mandatory, we will be unable to proceed with our business relationship. The more we know and understand about you, the more effective and informed the financial advice and intermediary services we can offer. Where you choose not to provide us with voluntary personal information, this may reduce the quality of service we are able to provide to you.

Whether voluntarily, mandatorily, directly or indirectly, you are in control of what information you volunteer, and which is subsequently collected by us. Some of your information that we hold may include your forenames, last name, place of birth, identity number, email address, a home, postal or other physical address, other contact information, your title, birth date, sex and gender, occupation, marital status, marital regime, whether you have a current Will, qualifications, employment status, employment history, residency status, your tolerance for risk, existing investments and risk assurance, assets & liabilities, income & expenditure, medical history, particulars of your family and your banking and tax details.

The source of collection of your personal information

Personal information is collected by us in the following ways:

- Directly from you during our WPS client onboarding process. This includes via the completion of our foundation documents as well as extraction from telephone calls, e-mails, text messages via WhatsApp (or similar), other supporting documents, our website and consultations with our authorised representatives.
- Completion of relevant application forms (electronic, online, or hard copy).
- Voluntarily during the course of our business relationship from telephone calls, e-mails, text messages via WhatsApp (or similar), other supporting documents, our website and consultations with our authorised representatives.
- Via referrals from existing clients and other third parties (subject to your Direct Marketing rights).
- Indirectly from other sources such as external third parties (only with your consent) or internet data.

Law authorising or requiring collection of your personal information

As an authorised financial services provider, we are obligated in terms of legislation to collect your personal information insofar as it relates to the rendering of the relevant financial services to you. Some of the relevant legislation which requires us to process your information includes:

- Companies Act
- Consumer Protection Act
- Disaster Management Act
- Financial Advisory & Intermediary Services (FAIS) Act
- Financial Intelligence Centre (FIC) Act

Purpose for processing your personal information

The majority of the personal information we collect is necessary for us to carry out our terms of engagement with you, to comply with our legal obligations, or for legitimate business interests. A legitimate interest is when we have a business reason to use your information. Even then, our legitimate interest must not be unfair to you and your interests.

We process your personal information to provide you with appropriate advice and intermediary services. We will only process your information for a purpose you would reasonably expect, including:

- To comply with any contractual agreements entered into between us.
- To act on or respond to your instructions or requests.
- To communicate with you via electronic methods.
- To confirm, verify and update your details where necessary.
- To share your personal information with third parties (such as product and service providers who assist us in administering or processing transactions) where required for the initiation or ongoing management of your product or service.
- To notify you of industry developments and send you marketing material or other business development related material which we believe may be of interest to you.
- For audit and compliance usage of our website.
- To investigate and deal with complaints or disputes.
- Recording incoming and outgoing calls to keep an accurate record of any instructions received from you in relation to your portfolio.
- To transfer your personal information to any third party who replaces WPS as a provider of services to you.
- To personalise and tailor the communications you receive from us - so that they are applicable and meaningful in the context of your own personal and financial position.
- To contact you when we have updated this Privacy Notice and other important documentation and consider that it is necessary to advise you about any changes to the way we are processing your personal information

We also need to use some of your personal information to comply with legal obligations:

- To verify your identity and conduct appropriate client due diligence as obligated by us in terms of the FIC Act.
- To enable a register of clients to be maintained and to keep records of transactions.
- To comply with our anti-money laundering, anti-corruption and anti-bribery obligations.
- To carry out searches at identity verification agencies.
- To detect, prevent and/or investigate fraud, money laundering and other financial crimes.
- To comply with audit requests from our auditor.
- To ensure you are eligible to participate in a product or service.
- To verify the adequacy of your income, source(s) of wealth or financial product experience.
- To comply with requests made by you when exercising your legal rights (such as those contained within this Privacy Notice).
- To comply with any other legal and regulatory requirements imposed by law on WPS.

Personal information which may be used to pursue our own legitimate business interests includes:

- Recording incoming and outgoing calls for training, monitoring, and security purposes.
- Reviewing and improving the information provided on the WPS website to ensure it is user friendly and to prevent any potential disruptions or cyber-attacks.
- Conducting an analysis required to detect malicious data and understand how this may affect our IT systems.
- To determine the target market for our existing and future service offerings.

Use of your personal information with your consent

Where we require your consent to process your personal information, you are entitled to withdraw your consent at any time. We will rely on your express consent, in writing, in the following instances:

- When we are obtaining your personal information on your behalf via a third party as you are not in a position or don't have the knowledge to provide it to us directly (for example, requesting policy and/or investment information via The Financial Services Exchange (Pty) Ltd, trading as Astute).
- When you have asked us to correspond with you via any contact details which were not previously provided to us or do not obviously belong to you (for example, to send you an email via an internet café or friend).
- When you request that we share your personal information with a third party and consent to that (for example, your spouse, your accountant or an authorised agent).
- Where you have opted-in to receiving marketing communications (and have not subsequently opted-out or requested to be removed from any marketing list).

However, as noted above, we are usually processing your personal information in order to provide you with advice and intermediary services, in which case withdrawing your consent will not change how we process your personal information. We will continue to process your personal information for those lawful purposes notwithstanding the fact that you have withdrawn your consent for one of the above listed purposes that requires your consent.

Third parties and your personal information

We may need to share your personal information with third parties in order to provide advice, reports, analyses, products or services that you have requested or to comply with legislation imposed on WPS. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us. We will never sell, rent or trade your personal information. Ever.

These third parties may include:

- Authorised Financial Service Providers with whom WPS has contractual relationships.
- Another third party who you have appointed to deal with certain financial products on your behalf (such as another investment advisor or wealth manager).
- The Financial Services Exchange (Pty) Ltd, trading as Astute.
- Your employer (where applicable) such as when assisting with retirement fund or group life insurance claims.
- Information technology specialists contracted by WPS to provide data storage, security, analytics, etc...
- Applications, software, and internet portals implemented for ease of business, security and communication between yourself and WPS (such as electronic signature applications).
- External distribution channels for electronic communication (such as Mailchimp).
- Regulatory or government authorities (where applicable).
- Our external compliance officer.
- Our contracted accountants and auditors.

We cannot control all use of your information by third parties (especially where they are not our service providers and under contract with us, for example, personal information shared with regulators). As such, where your personal information has been shared with another data controller entity, you will have rights over how that third party handles your personal information and you can and should contact those parties directly if you want to exercise your rights in relation to those third party's uses of your personal information.

Transferring your data abroad

WPS is a South African business and hence we do not have any reason to transfer your personal information abroad. It may be the case, however, where our third-party service providers operate in many different geographical locations and/or are bound by legislation or authorities in other jurisdictions. It is possible that those authorities will, in turn, also share your information with other regulators. You may instruct us to correspond with parties abroad. Your information may also be hosted on servers managed by a third-party both locally and abroad. We have taken steps to confirm that the level of protection afforded to your personal information by that third party is generally equal to the protection afforded by the POPI Act, which includes personal information which is transferred outside of the Republic of South Africa.

How long will we keep your information?

Your information may be held for a considerable period after our relationship ends (or indefinitely if anonymised).

Section 14 of POPIA regulates the retention and restriction of records and states that records of personal information must not be retained any longer than is necessary for achieving the purpose for which the information was collected or subsequently processed, unless:

- Retention of the record is required or authorised by law.
- We reasonably require the record for lawful purposes related to our functions or activities.
- Retention of the record is required by a contract between the parties thereto.
- You, or a competent person where the data subject is a child, have consented to the retention of the record.

After you cease to be a client of WPS, we may keep your data for up to an additional 7 years for any one of the below reasons:

- As required in terms of the Financial Advisory & Intermediary Services (FAIS) Act.
- As required in terms of the Financial Intelligence Centre (FIC) Act.
- As required in terms of the Companies Act.
- To respond to any questions or complaints.
- To maintain records in accordance with any other rules or legislation that apply to us.

Keeping your personal information secure

We are required to take appropriate, reasonable technical and organisational measures to prevent loss of/damage to, or unauthorised destruction of, your personal information as well as unlawful access.

Our security measures are constantly evolving, which may affect the way we do business or the way in which we communicate with you.

Save for where we can be found directly responsible, or instances where we are found to be negligent in following our prescribed policies and procedures in this regard, you will not be entitled to hold us liable for any unintended consequences arising out of personal information coming into the possession of persons not properly authorised to receive it.

Your rights as a 'data subject'

Under data protection laws you have a number of rights. Please note that these rights are not without limitation, and in some instances may not be available. Where applicable, you have the right to:

- Request that we confirm whether or not we hold personal information about you.
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed.
- Request that inaccurate/incomplete personal information be corrected/completed or deleted.
- Request that we consider your objections to the processing of your personal information.
- Object to direct marketing.
- Lodge a complaint with us and/or the Information Regulator.

To exercise your rights as set out above, please send an email to our appointed Information Officer (compliance@wealthps.co.za) and we will attend to your request in terms of our internal policies and procedures.

In the event that your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information Regulator.

For further information regarding the complaints process, please visit the website of the Information Regulator, or lodge a complaint via email as indicated below.

Email: complaints.ir@justice.gov.za

Website: <https://www.justice.gov.za/inforeg/index.html>

WPS Websites (IP Addresses & Cookies)

WPS may use IP addresses to analyse trends, track visitor's movements, and gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

"Cookies" are small pieces of information that are stored by your browser on your computer's hard drive. Generally, cookies work by assigning to your computer a unique number that has no meaning outside of our system. Our cookies do not contain any personally identifying information. We may use them to provide website statistics regarding the number of unique visitors to our site and for counting impressions on our pages. Cookies are also used to store your preferences (e.g., customize the columns displayed on your portfolio). Most web browsers automatically accept cookies, but you can change your browser to prevent that, although this may break certain other features of our site. Based on the aggregated information gained from cookies and IP addresses, statistical reports may be generated for use by WPS. This information will never identify you; it only defines site visitors in general terms.

If you use the WPS websites and follow a link from it to another website, different privacy policies may apply. Prior to submitting any personal information to a website, you should always read the privacy notice applicable to that website.

Updates to this privacy notice

We reserve the right to update this privacy notice at any time, and we will notify you when we make any substantial updates.

Version: 1.0
Effective date: 01.07.2021