



REALFIN

# Protection of Personal Information Act: Client Privacy Notice

## Introduction

RealFin will comply with your constitutional right to privacy and data protection when we handle your personal information. This Privacy Notice explains how we use and disclose your personal information, as is required by the Protection of Personal Information Act ("POPI").

RealFin and its employees respect your privacy and the protection of your personal information is of the utmost importance to us. We are committed to ensuring that your personal information is collected and used appropriately, transparently and according to applicable law.

## Who we are

Transparency and security form the foundation of RealFin.

- RealFin Collective Investment Schemes (RF) Proprietary Limited is a registered manager with the Financial Sector Conduct Authority in terms of the Collective Investment Schemes Control Act, No. 45 of 2002 ("CISCA").
- RealFin Fund Services Proprietary Limited is an authorised Financial Services Provider (license no. 46537) in terms of the Financial Advisory and Intermediary Services Act, No. 37 of 2002 ("FAIS").

## What information we collect

We collect and process your personal information mainly to provide you with access to our services and products, to service your account, to improve our services to you, and to inform you of additional services or products.



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The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose. Where possible, we will inform you what information you are required to provide to us and what information is optional.

We may collect the following information;

- **contact details:** email, telephone, address etc.
- **demographic information:** birth date, identification number, marital status etc.
- **history:** employment, financial, educational etc.

## What we do with the information we gather

We may collect, process, transfer or disclose your personal information only for the purposes for which it was collected or agreed with you, for example:

- To provide our services and products to you and to carry out the transaction you requested and to maintain our relationship;
- For identification and verification requirements in terms of FICA;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To confirm and verify your identity or to verify that you are the authorised individual to transact on the applicable account for security purposes;
- To our designated service providers in so far as this is necessary in order to service your account, to improve our services to you and to provide you with products you have requested. You acknowledge and agree that you consent to the collection, use and disclosure of such personal information for such purpose. When personal information is so transferred, we will use contractual or other means to ensure that such third party service providers provide privacy protection that is comparable to the protection we provide in accordance with our privacy and security policy;
- We may disclose your personal information to service providers who are involved in the delivery of investment products or services to you from time to time;
- For operational purposes;
- For audit and record keeping purposes;



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- In connection with legal proceedings;

We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.

Please note that RealFin utilises an offshore server for purposes of making secure data backups. When personal information is so transferred, we have used contractual or other means to ensure that such third party service providers provide privacy protection that is comparable to the protection we provide in accordance with our privacy and security policy.

## Ongoing financial services

Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other financial products and services which may be of particular interest to you.

You may opt out at any time if you don't want to receive any further communications of this nature.

## Disclosure of information

We may disclose your personal information to service providers you elect to use as well as our appointed service providers who are involved in the delivery of services or products to you. When personal information is so transferred, we will use contractual or other means to ensure that such third party service providers provide privacy protection that is comparable to the protection we provide in accordance with our privacy and security policy.

We may also disclose your information:

- Where we have a duty or a right to disclose it in terms of law, industry codes or public interest;
- Where we believe it is necessary to protect our rights.

## Information security



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We are committed to ensuring that your information is secure. In order to prevent unauthorised access or use of your personal information, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect from you.

We will continuously review our security controls and processes to ensure that your personal information is secure.

## Your rights to access and correction of your personal information

You have the right to access the personal information we hold about you. You also have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before providing details of your personal information or making changes to personal information.

You can contact us at the numbers or addresses provided below, and request the information you would like:

<b>Information officer:</b>	Claire Carpenter
<b>Telephone number:</b>	021-701 3777
<b>Postal address:</b>	Suite 25, Private Bag X16, Constantia, 7848
<b>Physical address:</b>	1st Floor, 4 Silverwood Close, Steenberg Office Park, , Tokai, 7945 Cape Town
<b>Email address:</b>	ccarpenter@realfin.co.za
<b>Website:</b>	<a href="http://www.realfin.co.za">www.realfin.co.za</a>

## Definition of personal information

The POPI Act defines personal information as follows;

**“personal information”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to-

- (a) 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;
- (b) Information relating to the education or the medical, financial, criminal or employment history of the person;



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- (c) *Any identifying number, symbol, email-address, physical address, telephone number, location information, online identifier or other particular assignment to the person;*
- (d) *The biometric information of the person;*
- (e) *the personal opinions, views or preferences of the person;*
- (f) *correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;*
- (g) *the views or opinions of another individual about the person; and*
- (h) *the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about that person;*

### **Changes to this notice**

This privacy policy may be amended from time to time without any notice to you when improvement is required and/or as privacy legislation changes. Please check our website periodically to inform yourself of any changes.