

NOVARE[®]



NOVARE GROUP PRIVACY NOTICE

THE PURPOSE OF THIS NOTICE

Your privacy is important to Novare Holdings (Pty) Ltd and its subsidiaries ('Novare' or 'we' or 'us'). We are committed to protecting your privacy and ensuring that your personal information is collected, processed and used properly and lawfully.

This Privacy Notice aims to explain how we process your personal information under the applicable data protection laws, specifically the Protection of Personal Information Act 4 of 2013, Republic of South Africa (POPIA).

WHAT IS PERSONAL INFORMATION

POPIA defines personal information as "information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The person to whom personal information relates is referred to as the "data subject".

Examples of personal information include, but are not limited to identity numbers, contact information, financial information, information relating to race, gender, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of a person.

It includes 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.

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

OUR DATA PROTECTION VALUES

When collecting, using, storing or sharing your personal information, the following is important to us:

1. Using your personal information in a way that is fair and trustworthy.
2. Transparency about what information we collect, what we do with it and who we share it with.
3. Working with you to promptly resolve any query or concern which you may have on how we use your information.
4. Taking all reasonable steps to protect your information from misuse and keeping it secure.
5. Complying with all applicable data protection laws and regulations and cooperating with data protection authorities and regulators.

WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal information to provide you with our products and services and for other legitimate business purposes relating to our business activities. To do this, we either enter into an agreement or accept a mandate from you, authorizing us to provide these services to you and on your behalf in relation to third parties.

The type of personal information we collect will depend on the purpose for which it is collected and used. When you contact us, enter into an agreement with us or provide us with a mandate to represent you, we will collect only the personal information that we need to provide you with, or acquire from you the selected products and/or services.

USE OF YOUR PERSONAL INFORMATION

We will collect and process your personal information only for the purposes for which it was collected and as agreed, for example:

- to provide our products or services
- to comply with legal and regulatory requirements or industry codes
- to execute your transactions
- to maintain our relationship with you
- to confirm and verify your identity
- for the detection and prevention of fraud, crime, money laundering or other malpractice
- to conduct market or customer satisfaction research and for statistical analysis
- for audit and record-keeping purposes
- to liaise with third-parties to offer services that form part of the products or services we provide to you
- in connection with legal proceedings

INFORMATION QUALITY AND SECURITY

We provide adequate protection to prevent unauthorized access and use of the personal information we store. We will continue to review our security controls and related processes and technology to ensure that your personal information is secure and used only in line with what is set out in this notice.

Our security policies and procedures include:

- physical security
- computer and network security
- secure communications
- security when contracting out activities or functions
- retention and disposal of information
- acceptable use of personal information
- governance and regulatory compliance
- monitoring access and usage of private information
- adequate protection of personal and identifiable information
- data portability
- investigating and reacting to security incidents

WHO WE SHARE YOUR INFORMATION WITH

Novare may not sell, rent or trade your personal information to any third party.

We may disclose your personal information and share it with third parties who are involved in the delivery of our 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.

Where we interact with third parties and share personal information, we take reasonable steps to impose appropriate security, privacy and confidentiality obligations on those recipients as processors of personal information. This is to ensure that personal information that we are responsible for, is kept secure and only processed lawfully.

The disclosure of personal information to third parties may involve the transfer of personal information to other countries. These countries may not have the same data protection laws as

those that apply in your country. We have put in place contractual provisions with those recipients. Before we contract with third parties in foreign jurisdictions, we ensure that the recipient is subject to a law or binding agreement with Novare that provides for similar or better protection of your personal information than is provided for in this notice.

We may legally disclose your personal information in circumstances 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.

YOUR RIGHTS TO ACCESS AND CORRECTION OF INFORMATION

You have the right to request a copy of the personal information which we have on record for you. To do so, simply contact us at datasecurity@novare.com and specify what information you would like. Before we provide you with your personal information, we will take reasonable steps to confirm your identity.

Please note that such an access request may be subject to the payment of a legally allowable fee.

You have the right to ask us to update or correct your personal information. You may do this by contacting your financial adviser, fund consultant or a client services consultant.

We will take reasonable steps to confirm your identity before making changes to the personal information we may hold about you.

Keeping your personal information up-to-date and accurate remains your responsibility. If there are changes to your personal information such as a change in contact details or a residential address, please contact your financial adviser or a client services consultant to update your records.

RETENTION OF YOUR PERSONAL INFORMATION

You have the right to request that we erase or delete your personal information. However, this right is limited.

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:

- your consent
- any compliance requirement in terms of legislation
- the retention of personal information for scientific, historical or statistical purposes
- for the establishment, exercise or defence of legal claims

PRIVACY COMPLAINTS, COMPLIMENTS OR COMMENTS

If you have any questions, comments or concerns about how we deal with your personal information, you may request that we:

- do not contact you in future
- provide you with a copy of the personal information which we hold about you
- correct, update, or pseudonymise your personal information in our records
- investigate any alleged misuse of your personal information

HOW TO CONTACT US

If you have questions about this notice or need further information about our privacy practices or policy, please contact us at datasecurity@novare.com.