

# Protection of personal information policy



## 1. Introduction

Plexus Wealth KZN (Pty) Limited (PW KZN) (Reg number 1997/018511/07) is an authorised category II Discretionary Financial Services Provider with FSP number 21635.

PW KZN is obligated to comply with The Protection of Personal Information Act, 2013 (Act 4 of 2013) (POPI). POPI requires PW KZN to inform their clients as to the manner in which PW KZN uses, discloses and destroys their personal information.

PW KZN is committed to protecting its clients' privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws.

This policy sets out the manner in which PW KZN deals with their clients' personal information and stipulates the purpose for which said information is used.

## 2. Personal Information Collected

Section 9 of POPI states that "Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive."

PW KZN collects and processes clients' personal information pertaining to the clients' financial needs.

The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, PW KZN will inform the client as to the information required and the information deemed optional. Examples of personal information PW KZN collects include, but is not limited to:

- The client's identity number, name, surname, address, postal code, marital status, and number of dependents.
- Description of the client's residence, business, assets, financial information, banking details, etc.
- Any other information required by PW KZN and their service- and product providers in order to provide clients with a comprehensive financial service.

PW KZN also collects and processes the client's personal information for marketing purposes in order to ensure that our products and services remain relevant to our clients and potential clients.

PW KZN have agreements in place with all product- and third-party service providers.

PW KZN's product providers are subject to the same regulations as applicable to PW KZN.

With the client's consent, PW KZN may also supplement the information provided with information PW KZN receives from other providers in order to offer a more consistent and personalised experience in the client's interaction with PW KZN. For purposes of this policy, clients include potential and existing clients.

## 3. The Usage of Personal Information

A client's personal information will only be used for the purpose for which it was collected and as agreed. This may include:

- Providing products or services to clients and to carry out the transactions requested;
- Confirming, verifying and updating client details;
- For the detection and prevention of fraud, crime, money laundering or other malpractices;
- Conducting market or customer satisfaction research;
- For audit and record keeping purposes;
- In connection with legal proceedings;
- Providing PW KZN's services to clients, to render the services requested and to maintain and constantly improve the relationship;
- Providing communication in respect of PW KZN and regulatory matters that may affect clients; and
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

According to section 10 of POPI, personal information may only be processed if certain conditions, listed below, are met along with supporting information for PW KZN's processing of personal information:

- The client consents to the processing: consent is obtained from clients during the introductory, appointment and needs analysis stage of the relationship.
- The necessity of processing: in order to conduct an accurate analysis of the client's needs for purposes of amongst other credit limits, insurance requirements, etcetera.
- Processing complies with an obligation imposed by law on PW KZN.

- The Financial Advisory and Intermediary Services Act ('FAIS') requires Financial Service Provider's ('FSPs') to conduct a needs analysis and obtain information from clients about their needs in order to provide them with applicable and beneficial products.
- Processing protects a legitimate interest of the client — it is in the client's best interest to have a full and proper needs analysis performed in order to provide them with an applicable and beneficial product or service.
- Processing is necessary in pursuing the legitimate interests of PW KZN or of a third party to whom information is supplied — in order to provide PW KZN clients with products and or services both PW KZN and any of our product suppliers require certain personal information from the clients in order to make an expert decision on the unique and specific product and or service required.

#### 4. Disclosure Of Personal Information

PW KZN may disclose a client's personal information to any of the PW KZN subsidiaries, joint venture companies and or approved product supplier or third-party service providers whose services or products clients elect to use. PW KZN has agreements in place to ensure compliance with confidentiality and privacy conditions.

PW KZN may also share client personal information with, and obtain information about clients from third parties for the reasons already discussed above. PW KZN may also disclose a client's information where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary in order to protect PW KZN rights.

#### 5. Safeguarding Client Information

It is a requirement of POPI to adequately protect personal information. PW KZN will continuously review its security controls and processes to ensure that personal Information is secure.

The following procedures are in place in order to protect personal information:

- The PW KZN Information Officer is L Ruwiel whose details are available below and who is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPI. She is assisted by E Jones who will function as the Deputy Information Officer.

- This policy has been put in place throughout PW KZN and training on this policy and the POPI Act will be done on a continuous basis.
- Each new employee will be required to sign an employment contract containing relevant clauses for the use and storage of employee information, or any other action so required, in terms of POPI.
- Every employee currently employed within PW KZN will be required to sign an addendum to their employment contract containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI.
- PW KZN's archived client information is stored off-site. Access to retrieve information is limited to authorised personal.
- PW KZN's product suppliers and other third-party service providers will be required to sign a service level agreement guaranteeing their commitment to the Protection of Personal Information; this is however an ongoing process that will be evaluated as needed.
- All electronic files or data are backed up and PW KZN is responsible for system security that protects third party access and physical threats.

#### 6. Access And Correction of Personal Information

Clients have the right to access the personal information PW KZN holds about them. Clients also have the right to ask PW KZN to update, correct or delete their personal information on reasonable grounds. Once a client objects to the processing of their personal information, PW KZN may no longer process said personal information. PW KZN will take all reasonable steps to confirm its clients' identity before providing details of their personal information or making changes to their personal information.

Contact details:

Information Officer: LE Ruwiel  
 Tel number: 021-9131375  
 E-mail: lruwiel@blcs.co.za

Dep Info Officer: E Jones  
 Tel number: 031-940 0470  
 E-mail: eric@plexuswealth.co.za

Plexus Wealth KZN (Pty) Limited  
 Telephone Number: 031-940 0470  
 Website: www.plexuswealth.co.za