

# Privacy Policy

## INTRODUCTION

To achieve the client's financial needs, goals and objectives, AS Sure (FSP) must collect and use information, including personal information as defined in the Protection of Personal Information Act No. 4 of 2013. Personal information means information that alone or jointly with other factors identifies you as a person. This includes information such as your name, contact details, telephone number, biometric information, registration number and any other information we need to collect.

To enable the financial service provider (FSP) and representatives of the FSP to render financial services related to certain financial products / services, the financial adviser may require special personal information to achieve the client's objectives. Special personal information includes, but is not limited to, information concerning a child and personal information concerning the financial status, health or criminal behaviour of a client. The FSP, its representatives and employees treat all personal information they collect as private and confidential.

"Personal Information" is defined by the Protection of Personal Information Act (the Act) as: "information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person" The POPI Act, can be found here: [chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/https://www.gov.za/sites/default/files/gcis\\_document/201409/3706726-11act4of2013protectionofpersonalinforcorrect.pdf](chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/https://www.gov.za/sites/default/files/gcis_document/201409/3706726-11act4of2013protectionofpersonalinforcorrect.pdf)

## RIGHT TO CHANGE PRIVACY STATEMENT

We may change this privacy statement to align with changes in the law or changes in technology that impact on how we process your personal information. We will publish all changes that describe our new practices on our website, and the latest version will replace previous versions.



**AS Sure Investment Services (PTY) Ltd**

Reg No. 1999/021726/07

Directors: AF Knowles; C Meddows-Taylor; N Muscat;

PO Box 5164, Rivonia, 2128

[www.as-sureinvestments.co.za](http://www.as-sureinvestments.co.za) | 011 591-0660

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## COLLECTION OF PERSONAL INFORMATION

Personal information is collected directly from you and may be collected indirectly from other external sources for purposes of fulfilling our regulatory and financial services statutory obligations. Examples of other sources include:

- Regulators. These regulators may be inside or outside South Africa;
- Sanctions lists, which include media sources such as newspapers, social media and the broadcast news;
- Law enforcement agencies such as the South African Police Service;
- Credit bureaus;
- Our product and service providers; and/or
- Verification agencies.

## WHY DO WE COLLECT PERSONAL INFORMATION

We collect and process your Personal Information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We collect your personal information for a number of reasons, including the following:

- To confirm / verify your identity or to verify that you are an authorised customer for security purposes
- To carry out our obligations arising from any contracts entered into between you and us
- For the detection and prevention of fraud, crime, or other malpractice
- To respond to your queries or comments
- To analyse your suitability for the products and services you apply for;
- To gather/collect/analyse data for business intelligence;
- To monitor financial sector trends and emerging market conduct risks; and/or
- To manage third-party relationships

## WHAT PERSONAL INFORMATION DO WE COLLECT

Types of personal information we collect, and process are mentioned below;

- Identifying number (employee number; company registration numbers, ID number);
- Email-addresses, physical address, telephone number;
- Names, surname, marital status, nationality, age, physical health status, mental health status, wellbeing, disability status, language, birthplace, date of birth. Information on criminal record/proceedings; and/or
- Education, medical, financial and employment information;



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- Information relating to any current products/services you may have/use, insofar as they are required for business purposes. We may not be able to carry out our mandate and provide you with suitable financial services without your personal information.

## **FOR HOW LONG DO WE STORE PERSONAL INFORMATION**

As long as necessary to enable us to render financial services to you; and

- As long as any law or regulations relevant to the financial services industry prescribes the recordkeeping period.

## **THE USE OF THIRD PARTIES**

We will from time to time share your personal information with third parties. We will disclose your personal information only if:

- It is necessary to comply with our regulatory obligations and financial services laws;
- For business purposes;
- When we believe it will enhance the services and products we can offer to you;
- We have a public duty to disclose the information;
- Your legitimate interests require disclosure; and
- You have provided consent for us to disclose your information. These third parties may include but are not limited to:
  - Regulators and the FAIS Ombud;
  - Other regulators;
  - Product / Service Providers;
  - Law enforcement agencies; and
  - Verification agents. Where appropriate, we request the third parties who we share information with, to take adequate measures and comply with applicable data protection laws and protect the information we are disclosing to them. We do this through contractual arrangements with these third parties. We also take internal measures to ensure that the third parties we appoint have appropriate measures to protect the information we provide to them.

## **YOUR RIGHTS**

As the client you have rights that you can exercise in relation to the personal information we hold about you. You can exercise your right to:

- Request access to the information we hold about you;
- Request correction and updates of the personal information we hold about you;
- Object to the way in which we use personal information about you;



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- Request the deletion of your personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully or where we are no longer authorised to keep such information;
- Complain to us about the way we use your personal information. If you are not satisfied with how we handle your complaint, you can lodge a complaint with the Information Regulator.
- It is important to note that the rights are not absolute and must be balanced against other competing rights. We may also rely on certain exceptions that may impact on your rights, for example, your right to object or the right of access to information. We will only do this where the interest we are mandated to protect outweighs to a substantial degree interference with your privacy. Where possible in terms of law, we will explain the exception we are relying on and its impact on your rights.

## OUR SECURITY PRACTICES

Our security systems and controls are designed to maintain confidentiality, prevent loss, unauthorised access and damage to information by unauthorised parties. We conduct continuous security monitoring and assessments to improve our security posture and provide assurance to all our stakeholders. Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of personal information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Investigating and reacting to security incidents.

## USE OF COOKIES ON WEBSITE

We may use cookie technology on our website. Cookies are small files that are stored on a user's computer when you use our website. We have non-essential cookies that enable us to distinguish users, and strict transport security which allows a website to declare itself a secure host.



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## USE AND MONITORING OF ELECTRONIC COMMUNICATIONS

It is important that we keep the public abreast of any development that has a public interest. As such we may communicate with you and the public using different channels, including social media.

## RETENTION OF PERSONAL INFORMATION

Personal information is retained and destroyed as required or authorised by law, and for defined purposes related to the activities of the FSP.

## HOW TO CONTACT US

To object to the processing of your personal information, kindly contact us on +27 11 591 0660 or [anthea@as-sure.co.za](mailto:anthea@as-sure.co.za).

If you think your personal information is being tampered with, or that it has not been protected, you may also contact our information officer using the details above. If you are dissatisfied with the outcome of any request for information referred to us, you may approach the Information Regulator of South Africa. The contact details are as follows:

The Information Regulator Complaints email: [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)



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