

PROTECTION OF PERSONAL INFORMATION POLICY



FRANZSEN & VAN REENEN WEALTH ADVISORY (PTY) LTD

2018/360159/07

FSP NUMBER 51972

1. INTRODUCTION

- 1.1. Personal information is information that can be related to an identifiable natural person or, to the extent applicable, a juristic person (known as a “data subject”)
- 1.2. Protection of personal information is enshrined in the Constitution of South Africa, and this policy aims to give effect to this right by regulating the way Franzsen & van Reenen processes personal information.
- 1.3. Processing of personal information refers to any activity concerning personal information including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure, or destruction of information.
- 1.4. Franzsen & van Reenen is an authorised financial services provider whose business includes wealth advisory services to a small group of ultra-high net worth families. Franzsen & van Reenen may therefore need to collect personal information from its clients to comply with applicable law and/or to render efficient and effective services.
- 1.5. Franzsen & van Reenen, as the responsible party, is committed to principles of accountability, transparency, and consensual and responsible processing of personal information.
- 1.6. It is the intention of Franzsen & van Reenen that this policy will protect an individual’s personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.

2. PURPOSE OF PROCESSING PERSONAL INFORMATION

- 2.1. Personal information is processed for the following purpose(s):
 - Franzsen & van Reenen will process your information in the ordinary course of the business of providing wealth advisory and related services.
 - Franzsen & van Reenen will use your personal information only for the purpose for which it was originally or primarily collected.
 - Your personal information will only be used for a secondary purpose if such purpose constitutes a legitimate interest and is closely aligned with the original or primary purpose for which your personal information was collected.
 - Franzsen & van Reenen collects and processes personal information for several reasons, including but not limited to:
 - meeting our responsibilities to our clients

- general human resource and finance functions including those obligations imposed by legislation
- recruitment
- meeting our contractual responsibilities to third-party service providers
- informing clients of products and services
- complying with all legal and regulatory requirements, including industry codes of conduct
- protecting and pursue the legitimate interests of Franzsen & van Reenen
- for any further purposes related to the above.

2.2. Any further processing of data must be compatible with the purpose(s) for which the information was collected.

2.3. Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, are stored in archives for record-keeping and back-up purposes only.

2.4. Franzsen & van Reenen will not, without an individual's consent, share information with any other third parties, for any purposes whatsoever, without written consent by the person to whom the personal information relates.

3. OBTAINING PERSONAL INFORMATION

3.1. Personal information is acquired with the consent of the data subject, which consent can be withdrawn at any time by notification to Franzsen & van Reenen.

3.2. As far as possible, personal information is collected directly from the data subject.

3.3. Franzsen & van Reenen is committed to ensuring the accuracy of the personal information collected.

4. STORAGE AND SECURITY OF PERSONAL INFORMATION

4.1. Franzsen & van Reenen strives to ensure the security, integrity and privacy of personal information submitted. Franzsen & van Reenen will review and update its security measures in accordance with legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, Franzsen & van Reenen will endeavour to take all reasonable steps to protect the personal information, which an individual submits to Franzsen & van Reenen or to Franzsen & van Reenen's online products and services. Franzsen & van Reenen will always set the highest standards to ensure the integrity of their systems.

- 4.2. Franzsen & van Reenen may engage with other organisations to provide support services to Franzsen & van Reenen. Third Parties are obliged to respect the confidentiality of any personal information held by Franzsen & van Reenen. A Service Level agreement is in place with all Third parties to ensure adherence to all Privacy Policies.
- 4.3. Franzsen & van Reenen's employees are obliged to respect the confidentiality of any personal information held by Franzsen & van Reenen. All employees are required to sign an employment contract which includes a confidentiality clause.
- 4.4. Franzsen & van Reenen will not reveal any personal information to anyone unless:
 - 4.4.1. It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law;
 - 4.4.2. It is in the public interest to prevent financial loss;
 - 4.4.3. Franzsen & van Reenen needs to do so to protect its rights.
- 4.5. Franzsen & van Reenen endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date.
- 4.6. Franzsen & van Reenen employed the following security measures to ensure the privacy and integrity of the personal information collected -
 - 4.6.1. Information is stored on secured database only accessible to employees of Franzsen & van Reenen and
 - 4.6.2. Information is collected electronically to minimise the use of hard copies.
- 4.7. If at any time, an individual discovers that information gathered about them is incorrect, they may contact Franzsen & van Reenen to have the information corrected.
- 4.8. Franzsen & van Reenen will not retain and/or store personal information longer that is necessary given the purpose for which the personal information was collected except for historical, statistical and research purposes and then only with suitable safeguards in place to ensure the privacy and integrity of the personal information.

5. BREACH OF SECURITY

- 5.1. Franzsen & van Reenen undertakes to ensure reasonable organisation and technical measures are in place to prevent, insofar as possible, any infringements on the privacy and integrity of personal information.

5.2. In the event of a breach of security Franzsen & van Reenen undertakes to notify the Regulator and the data subject in writing as soon as possible of any breach of security.

5.3. Notification to the data subject shall be done via mail to the data subject's last known e-mail address or as directed by the Regulator.

6. TRAINING

As part of its commitment to ensuring organisation wide compliance with this policy, Franzsen & van Reenen implements annual training for all staff member of Franzsen & van Reenen.

7. INFORMATION OFFICER/CONTACT DETAILS

7.1. Any questions relating to Franzsen & van Reenen's privacy policy, or the treatment of an individual's personal data should be addressed to the Information Officer, whose contact details are:

INFORMATION OFFICER: SCHALK VAN REENEN

Telephone number: 083 4458220

Postal address: 17 Fraser Street, Somerset West, 7130

Physical address: Same as above

Email address: svanreenen@fvr-advisory.com

Website: www.fvr-advisory.com