



PSG Konsult Ltd

PRIVACY NOTICE

This is a controlled document. It should not be altered in any way without the express permission of the author or their representative

On receipt of a new version, please destroy all previous versions

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Amendment history

Issue	Status	Date	Reason for change	Authorised
1	Final	7 August 2018	Update of previous privacy notice	Jan Eksteen
2				
3				

INTRODUCTION

Your privacy is important to PSG Konsult Ltd and its subsidiaries ('PSG' or 'we' or 'us'). We are therefore committed to protecting your privacy and ensuring that your personal information is collected, processed and used properly and lawfully, with the required confidentiality and transparency. This notice sets out the practices applicable to the protection of your personal information and explains how we obtain, use and disclose your personal information.

Subsidiary entities within PSG may have additional notices in place with provisions in relation to personal information that may be specific to the entity in question and may apply to the relationship that you have with PSG. To the extent that any PSG entity may have such a dedicated notice dealing with personal information in place, such a notice should be read in conjunction with this notice.

This notice aims to set out:

- Scope within PSG
- Purpose
- Definitions
- Our data protection values
- What information we collect
- Cookies and how we use it
- Use of your personal information
- Who we share your information with - Information quality and security
- Your rights to access and correction of information
- Retention of your personal information
- Privacy complaints, compliments or comments
- Updates to this notice
- How to contact us
- The Information Regulator's contact details

SCOPE OF THIS NOTICE

PSG is a financial services group and consists of different business divisions across various legal entities. Collectively, these divisions provide stockbroking, financial and estate planning, short-term and long-term insurance, asset management, collective investments and other financial services to their clients. This privacy notice applies to all divisions and subsidiaries within the PSG Konsult Group.

PURPOSE OF THIS NOTICE

This privacy notice aims to explain how we deal with your personal information in light of the data protection laws and regulations that apply to the jurisdictions where we do business. We have a privacy policy which sets out how we manage privacy in our company given current technology. We are constantly updating our system processes and technology to ensure optimal data protection. You are welcome to request more information about the policy.

DEFINITIONS

For the purposes of this notice:

- a) 'personal Information' means the information relating to living, natural persons and juristic persons, who can be identified, directly or indirectly, by reference to identifiers such as names, identification numbers, location data, online identifiers or by their physical, physiological, genetic, mental, economic, cultural or social identity.
- b) 'you/your' refers to the client of PSG whose personal information is being processed or captured
- c) 'controller' means the natural or legal person, agency or other body which, alone or jointly with others, determines the purposes and means of processing personal information. For the purpose of this policy, the controller shall mean PSG,
- d) 'processor' means the natural or legal person processing personal information on behalf of a controller, as well as those who are under the direct authority of the controller or processor
- e) 'recipient' means a natural or legal person which processes personal information on behalf of the controller
- f) 'third party/ies' are natural or legal person, other than the data subject, controller, or processor, that are authorised to process personal data

OUR DATA PROTECTION VALUES

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

1. The trust that you place in us by giving us your personal information. We will always use your personal information in a way that is fair and worthy of that trust.
2. Providing clarity on how we use your personal information. We will always be transparent with you 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 keep it secure.
5. Complying with all applicable data protection laws and regulations and co-operating with data protection authorities and regulators.

WHAT INFORMATION WE COLLECT

We collect and process your personal information to provide you with access to our products and services. To do this, we either enter into an agreement with you, or accept a mandate from you, authorizing us to provide these services to you and on your behalf in relation to third parties. In addition, we may collect and process your personal information to help us improve our offerings to you and for other lawful purposes.

The type of 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 information that we need to provide you with the products and/or services that we offer.

We also collect information about your experiences over time as you use our website. This information is given to your browser by our web server when you visit our website.

COOKIES

When you use our website, we gather standard internet visitor usage information. This is done through 'cookies' and similar tools. Cookies help websites remember information about your device and information on how you use the website. We use this information to monitor the areas of the website that are used most frequently and use this knowledge for future website enhancements. This information is anonymised, pooled information, and individual behaviour or patterns cannot be identified.

If you do not wish for us to collect this information, your browser will normally allow you to disable cookies.

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 execute your transactions
- to maintain our relationship with you
- to conduct credit reference searches or verification with third parties
- to confirm and verify your identity or to verify that you are an authorized user for security purposes
- for the detection and prevention of fraud, crime, money laundering or other malpractice
- for debt tracing or debt recovery
- 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 to that form part of the products you have with us
- in connection with legal proceedings

We will also use your personal information to comply with legal and regulatory requirements or industry codes.

If you inform PSG or its subsidiaries that you do not want us to continue using your personal information, we will stop doing so.

WHO WE SHARE YOUR INFORMATION WITH

From time-to-time, we have to disclose your personal information to and share it with third parties who are involved in the delivery of 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. PSG conducts due diligence investigations into all new and existing financial and related products and services offered by third parties on an ongoing basis.

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.

INFORMATION QUALITY AND SECURITY

We provide adequate protection to prevent unauthorized access and use of the personal information we store. We will, on an ongoing basis, 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

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 PSG that provides for similar or better protection of your personal information than is provided for in this notice.

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 pi@psg.co.za 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 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. In the event that 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:

- 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

Where 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

UPDATES TO THIS NOTICE

This notice will be updated when new legislation is released, or other material changes are required. A notice will be published on the homepage of our website. Please check this website periodically to inform yourself of any changes.

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 pi@psg.co.za or contact your financial adviser.

INFORMATION REGULATOR'S CONTACT DETAILS

You have the right to complain to the Information Regulator. Their contact details are:

Tel: 012 406 4818

Fax: 086 500 3351

Email: infoereg@justice.gov.za