

## Asande Group of Companies

### Privacy Statement

Asande Group of Companies is a private company with limited liability, registered under the company laws of the Republic of South Africa, registration number 2021/728658/07. In this notice, we refer to ourselves, collectively as Asande Group of Companies, 'we', 'us' and 'our'. The list of subsidiary companies under Asande Group of Companies are listed in Part A.

The name of the specific Asande Group company which processes your personal information, will depend on the kind of service you wish to receive. We'll let you know which company you have a relationship with during our service offering engagement.

This notice provides you with information about how, when, and why we use your personal information and how we keep it secure. It also sets out your rights under law, our responsibilities to you and how you can contact us.

The principal place of business for all companies within Asande Group of Companies is 75 George Storrar Drive Cnr Engelenburg Street, Groenkloof, Pretoria, 0181.

We reserve the right to update this privacy notice at any time, and we will notify you when we make any substantial updates. The latest version of this privacy notice can always be found at [www.asandegroup.co.za](http://www.asandegroup.co.za)

#### How We Collect the Information

- Information we receive through our website: [www.asandegroup.co.za](http://www.asandegroup.co.za)
- As a result of the services that we offer

#### 1. What Personal Information We Collect

When you engage us to become our client, and during the course of our dealings with you, we will collect some personal information about you. This includes what you tell us about yourself and what we learn by having you as a client. We have set out below a description of the types of personal information about you which we will collect:

- Your title, full name, your contact details such as your email address, home, business and mobile numbers; and/or
- your home address, correspondence address (where different from your home address) and address history; and/or
- Your gender, age, financial information and health status; and/or
- Personal information of your spouse, dependants and/or beneficiaries; and/or
- Personal information and contact information which you provide in correspondence with us, whether by email, written letter, or telephone call

- Any other information that may be required in the ordinary course of Asande Group of Companies performing its duties.

## **2. Where We Get Your Personal Information From**

We collect the personal information directly from you as part of our client on-boarding process. Additionally, we collect personal information from you when you correspond with us (whether by telephone, e-mail, or through the Asande Group Website). The nature of our relationship with you will determine the kind of personal information we might ask for.

Sometimes we collect additional information about you from third parties. Specifically, we will obtain information about you from:

- A public record or a record that has deliberately been made public by you
- Agencies who we use to monitor and prevent money-laundering

## **3. How We Use Your Personal Information and Why**

We mainly use the personal information we hold about you where it is necessary for us to perform our mandate with you and/or to enable us to comply with legal obligations. Your personal information will also be used when it is in our legitimate interest. A legitimate interest is when we, and sometimes third parties have a business or commercial reason to use your information. But even then, our legitimate interest must not unfairly prejudice what is right and best for you.

### **3.1. The use of your personal information for us to perform our mandate with you:**

- to communicate with you about your investment(s), product or service (i.e. periodic statements), to verify that your instructions are genuine and to process them accordingly;
- to investigate and deal with complaints or disputes; and
- to share your personal information with third parties, such as our service providers who assists us administer or process transactions if required for the management of your product or service.

### **3.2. The use of your personal information to comply with legal obligations:**

- to verify your identity and to carry out regulatory checks, such as anti-money laundering checks
- to detect, prevent and/or investigate fraud, money laundering and other financial crime
- to comply with audit requests from our compliance officer
- when, to achieve the above purposes, we share your personal information with the following categories of individuals or organisations:

- law enforcement agencies and governmental and regulatory bodies such as tax authorities, financial regulators/ombudsmen and non-financial regulators (depending on the circumstances of the sharing); and/or
- courts and to other organisations where it is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.

### **3.3. The Use of Your Personal Information To Pursue Our Legitimate Interests:**

- to comply with our legal and regulatory requirements, your tax residency and/or nationality;
- for anti-money laundering purposes;
- for regulatory compliance purposes relevant to specific products or services;
- to contact you when we have updated this Privacy Notice and consider that it is necessary to advise you about any changes to the way we are processing your personal information;
- when, to achieve the above purposes, we share your personal information with the following categories of individuals or organisations:
  - members of our Group;
  - our legal and other professional advisors and compliance officer;
  - governmental and regulatory bodies such as tax authorities, financial regulators/ombudsmen and non-financial regulators;
  - tax authorities who are overseas for instance if you are subject to tax in a different jurisdiction, we may share your personal information directly with relevant tax authorities (instead of through the local authority);

Should you have any questions about the above listed categories of people or organizations, including third parties we share your personal information with, please contact us using the contact information provided in this Privacy Notice.

### **3.4. Use of Your Personal Information with Your Consent**

We rely on your consent to use your personal information. We will rely on your consent for:

- when you request that we share your personal information with someone else and consent to that;
- where you have opted-in to receiving marketing communications and have not subsequently opted-out or requested to be removed from any marketing list; and



- when you volunteer information to us in correspondence, which information we need in order to respond to your enquiry, and only where lawful to do so.

You have the right to withdraw your consent at any time in writing. Please note, if you do withdraw your consent, this will mean that we will stop similar future processing. However, the withdrawal of your consent will not invalidate any processing which we previously undertook before you withdrew your consent.

Please note that, where we rely on another lawful reason to process your personal information which does not require your consent, withdrawing your consent will not affect that processing. This is the case where the processing is necessary for our performing our contract with you, or where we must process your personal information to comply with law, as described above. We will continue to process your personal information for those lawful purposes notwithstanding the fact that you have withdrawn your consent for one of the above listed purposes that requires your consent.

### **3.5. Whether You Have to Provide Personal Information**

If you want to use our services, there is some information which you will be required to provide to us either because of legal requirements, or because we need that information to provide our services to you.

We will tell you when the personal information requested is mandatory, or if it is voluntary. If you do not provide that personal information that is mandatory, we will be unable to properly provide you with the services and/or perform all obligations under our agreement with you. Where you choose not to provide us voluntary personal information this may reduce the quality of service we are able to provide.

### **3.6. Sharing Your Personal Information with Others**

Your personal information will be shared with other businesses, regulators and authorities.

If you have further questions about the third parties we share your personal information with, please contact us using the details in Part B.

We will never sell, rent or trade your personal information.

We will share your information with others who have a duty to keep it secure and confidential, and where we have a lawful reason for doing so, as explained above.



We cannot control all use of your information by third parties, especially where they are not our service providers and under contract with us. As such, where your personal information has been shared with another data controller entity, you will have rights over how that third party handles your personal information and you can and should contact those parties directly if you want to exercise your rights in relation to those third party's uses of your personal information.

### **3.7. How Long We Will Keep Your Information**

Your information may be held for a considerable period after our relationship ends or indefinitely if anonymised. If you have further questions about our data retention practices, please contact us using the details in Part B.

We are required to collect and keep personal information in terms of the following laws:

- The Electronic Communications and Transactions Act (ECT)
- The Financial Intelligence Centre Act (FICA)
- The Financial Advisory and Intermediary Services Act (FAIS)
- The Consumer Protection Act (CPA); and
- Long Term Insurance Act (LTIA); amongst others.

We will keep your personal information for as long as you are a client to any of the subsidiaries under Asande Group of Companies.

After you cease to be a client of ours, we may keep your data for up to an additional 5 years after the termination of the business relationship with you for one of the below reasons:

- To respond to any questions or complaints;
- To show that we treated you fairly;
- To maintain records in accordance with the rules that apply to us.

We may keep your data for longer than 10 years if we cannot delete it for legal, or regulatory reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use the data for those purposes and, to the extent possible anonymised.

### **4. Transfer Of Your Personal Information Outside South Africa (If Applicable)**

We will share your personal information with persons or organizations outside of South Africa in the following instances:

- If you give us an email address that is hosted outside South Africa; or
- To administer certain services, for example, cloud services; or

- Where required to administer any offshore product or financial services as may be determined during the business relationship and your specific portfolio. We will ensure that any country, company or person that we pass (if necessary) your personal information to agrees to treat your information with the same level of protection as we are obliged to.

#### **4.1. Your Rights ('Data Subject' Rights)**

You have a number of rights over your personal information including a right to object to the processing of your information. However, you will not be able to use these rights in all circumstances.

You are also entitled to make a complaint to the regulator.

Under data protection law you have a number of rights that are set out below. Please note that these rights are not without limitation, and in some instances may not be available.

Where applicable, you have the right to:

- be informed about our processing of your personal information;
- have inaccurate or incomplete personal information corrected or completed;
- object to the processing of your personal information;
- restrict the processing of your personal information;
- have your personal information erased;
- request access to your personal information and to obtain information about how we process it;
- move, copy or transfer your personal information digitally;
- object to automated decision making, such as profiling.

Pursuant to applicable law, you will not be discriminated against for exercising certain of your rights as set out above

To exercise your rights as set out above, please write to us using the details in Part B. You have the right to know what personal information we hold about you. If you wish to receive a copy, please complete an 'Access Request Form' and specify the information you would like a copy of. This form is part of the our PAIA Manual to Accessing Information and can be found on the Asande Group website at [www.asandegroup.co.za](http://www.asandegroup.co.za) under "Disclosures and Policies" at the bottom of the "Home" page or on request from us by sending a formal written request to [info@asandegroup.co.za](mailto:info@asandegroup.co.za). We will take all reasonable steps to confirm your identity before providing details of your personal information. We are entitled to charge a fee for this service and will let you know what it is at the time of your request.

If you believe that we have used your personal information contrary to this Privacy Statement, you must first attempt to resolve any concerns with us. If you are not satisfied after this process, you have the right to lodge a complaint with the Information Regulator, under POPIA. If you have any complaints, please write to us or the regulator using the details in Part B.

#### 4.2. Asande Group of Companies Website

The content of this notice is likely to change over time. We will inform you if it changes.

We will always have the latest version available on the Asande Group Website.

Prior to submitting any personal information to a website you should read the privacy notice applicable to that website.

#### Part A

##### Subsidiary companies under Asande Group of Companies

|  |                                     |
|--|-------------------------------------|
| Asande Wealth Management (Pty) Ltd     | Asande Fiduciary Services (Pty) Ltd |
| Asande Chartered Accountants (Pty) Ltd | Asande Consulting (Pty) Ltd         |
| Asande Projects (Pty) Ltd              |                                     |

#### Part B

| Asande Group of Companies Information Officer   | Information Regulatory  |
|---|---|
| Business Address<br>75 George Storrar Drive<br>Groenkloof<br>Pretoria<br>0181<br>Tel: 012 942 7900<br>Email address: <a href="mailto:info@asandegroup.co.za">info@asandegroup.co.za</a> | SALU Building,<br>316 Thabo Sehume Street,<br>Pretoria<br>Tel: 012 406 4818<br>Fax: 086 500 3351<br>Email address: <a href="mailto:info@justice.gov.za">info@justice.gov.za</a> |