

PRIVACY STATEMENT

This notice is provided by Futurity Wealth Management and describes how we collect, use, share and protect your personal information.

Personal information refers to any information that identifies you or specifically relates to you as a natural living individual or a non-natural (e.g company) person. "Processing" includes collecting, recording, analysing, transferring, holding or deleting information or data.

COLLECTION

Personal information

We collect your personal information when you engage with us in terms of the provision of financial planning, investment management or other services. This information will relate your personal and financial circumstances and will include information about you, your dependents, your financial situation, and any other information which is required for us to respond to you or execute our services to you.

We also collect information about you based on your use of our products, services, or service channels and on how you engage or interact with us such as via emails, letters, and telephone calls or when you voluntarily complete client surveys or provide us with feedback.

Special personal information

The information we collect may contain children's information, bank account details or sensitive personal data such as data about your health, if this is necessary for the provision of our services. You may be assured that we and any company associated with us will treat all personal data and sensitive personal data as confidential and will not process it other than for a legitimate purposes. Special personal information will only be processed:

- if you have consented to the processing.
- if the information is being used for any Human resource or payroll requirement.
- if the processing is needed to create, use, or protect a right or obligation in law.
- if the processing is for statistical or research purposes and all legal conditions are met.
- if the special personal information was made public by you.
- if racial information is processed, and the processing is required to identify you;
- if health information is processed, and the processing is to determine your insurance risk, or to comply with an insurance policy or to enforce an insurance right or obligation.

3rd party information

We may need to gather personal information about your relatives and dependants in order to provide our services to you effectively. In such cases it will be your responsibility to ensure that they have the consent of the people concerned to pass their information on to us. In such instances, we request that you pass this privacy notice on to them.

Collection from 3rd parties

In certain instances, we collect personal information from 3rd parties. This includes:

- people you have authorised to share your personal information, such as a medical practitioner for insurance purposes
- your spouse, dependents, partners, employer, and other similar sources.
- from the payroll or HR departments of our clients when they capture financial and non- financial information;
- From product suppliers where your portfolio may be held and with whom you have a contractual relationship;
- from 3rd parties that are directly integrated with our software platform.
- payment processing services providers, merchants, banks, and other persons that assist with the processing of your payment instructions, like EFT transaction partners.
- financial institutions, or other organisations that assist with insurance and investment management, the providing of products, the assessment of insurance and assurance claims and other related purposes.
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements.

It is not compulsory to provide all the information we request, however the extent and quality of the services provided depends on the accuracy and completeness of the information supplied by you. It remains your responsibility to ensure that the information you provide is correct and complete. Incomplete or incorrect information could result in issues with product suppliers going forward, including claim repudiation.



We are required to ensure your personal information is correct and accurate, and brought up to date where there are any changes, therefore you are requested to contact our offices and make the necessary corrections where this happens. Incomplete or incorrect information could result in issues with service provision or with product suppliers going forward, including claim repudiation.

Please note that where your sensitive information changes, such as your bank details, that we will conduct additional verification as part of our security procedures.

LAWFUL PROCESSING

The lawful bases we rely on for processing personal information are:

1. contractual obligation

This is the primary legal basis that we intend to use for processing your data. The personal information that we collect about you is essential for us to be able to effectively carry out the services that we have agreed to deliver to you.

2. legal obligation

Sometimes, collecting personal data is needed to meet our legal and regulatory obligations. For example, anti-money laundering legislation may require us to collect personal information to verify your identity, and we are likewise required to retain records about you in accordance with regulatory periods.

3. consent

In certain instances, we may request your consent to process your personal data. This includes instances where special category data, such as that relating to health matters, may be required to provide our services, where we wish to contact you to offer additional products or services which may be of interest to you or where we do not rely on other lawful processing. You may withdraw your consent at any time by notifying us at our main business address.

4. legitimate interest

We rely on legitimate interest to retain relevant data for the purposes of assessing the appropriateness of our services, defending future complaints and meeting our Professional Indemnity Insurer's expectations or where processing is required to protect your or any third party's legitimate interest.

We process your information for the following reasons:

- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions, and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests.
- To verify you for security, identity verification and to check the accuracy of your personal information.
- To complete documentation required in the course of providing our services
- For analysis required to perform our contractual obligations to you
- To provide you with information in respect of products and services which may be appropriate to your ongoing financial planning needs
- To correspond with product and service providers on your behalf,
- For insurance and risk underwriting and administration.
- to communicate with you and carry out your instructions and requests.
- to respond to your enquiries and complaints.
- To assist any beneficiaries in the event of this being necessary
- To provide relevant information to the executor of estate for winding up purposes, where this is required
- to develop, test and improve products and services for you.
- to process payment instruments.
- For relationship correspondence
- To manage any complaints or litigation
- For audit and recordkeeping purposes
- for historical, statistical and research purposes, like market segmentation and / or for any other related purposes.

We may use your personal information to market financial, insurance, investments and other related products and services to you either in person, by telephone, or through electronic channels such as SMS, Whatsapp and email.

If you are not our client, or in any other instances where the law requires, we will only market to you by electronic communications with your consent. In all cases you can request us to stop sending marketing communications to you at any time.

How we secure your personal information

Your information is stored on our Onedrive server, which is cloud-based, and which does include cross-border transfer of information, however this is to locations which have the same or similar level of data protection in place. It is also stored on the other systems we use when providing you with our services, being nCino and Elite Wealth.

We are required by law to maintain this information for a period of 5 years after the termination of our relationship with you as a minimum, however we prefer to keep our records permanently, as we may need to access this to assist you with claims or complaints at some future date, or where we may need it for legitimate purposes or to protect your interests.

How long do we keep your personal information?

We will keep your personal information for as long as:

- the law requires us to keep it.
- a contract between you and us requires us to keep it.
- you have consented for us keeping it.
- we require it for statistical or research purposes.
- we require it for our legitimate business purposes.

When how and with whom we share your personal information

The information which you provide to us will be processed by our internal staff as well as:

- Service providers we engage to process information on our behalf or who render services to us. These service providers may be outside South African borders, and should this be the case, we will not share your information unless we are satisfied that there are adequate security measures in place to protect your information;
- Product suppliers in order to obtain quotations or place your business, or assist with administration;
- Third party systems we utilise in the course of providing services to you, for example for the purpose of anti-money laundering KYC processing or for conducting investment risk assessment;



- External auditors and Regulators. We are regularly audited by our Compliance Practice as well as the Financial Sector Conduct Authority. We may also be audited by other Regulators from time to time. It may happen that your file is one of those which are audited to ensure compliance with prevailing legislation, and in this instance, your information will be made available to these persons. In turn, they are also bound by strict confidentiality restraints and ethics.
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
- Regulatory authorities and local and international tax authorities.
- Trustees, Executors or Curators appointed by a court of law.
- Service providers, agents and sub-contractors like couriers and other persons we may use when providing services to you.

We may transfer your information for legitimate purposes including, where relevant, to attorneys and/or other debt collection agencies for debt collection purposes and carrying out operations on the information or data.

In general, we will only share your personal information:

- if you have consented to this.
- if it is necessary to conclude or perform under a contract, we have with you;
- if the law requires it; and / or
- if it's necessary to protect or pursue your, our or a third party's legitimate interest.

Under what circumstances will we transfer your information to other countries?

We will transfer your personal information to third parties in another country where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient; where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest; where you have consented to the transfer; and / or where it is not reasonably practical to obtain your consent and the transfer is in your interest. This transfer will happen within the requirements and safeguards of the law.

Your rights

Subject to certain exceptions, you are entitled to have access to your Personal and sensitive personal data held by us. This includes requesting: confirmation that we hold your personal information; a copy or description of the record containing your personal information; and the identity or categories of third parties who have had access to your personal information. You may be charged a fee (subject to the statutory maximum) for supplying you with such data. We will inform you of the fee before attending to your request.

It remains your responsibility to ensure that the information you provide is correct and complete. You have the right to request us to correct or delete the personal information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or we are no

longer authorised to keep it. Please refer to our PAIA Manual for further information in this regard.

You may object on reasonable grounds to the processing of your personal information.

We will not be able to give effect to your objection if the processing of your personal information was and is permitted by law; you have provided consent to the processing and our processing done according to your consent or the processing is necessary to conclude or perform under a contract with you.

Complaints and Queries

Should you have any queries or complaints in respect of the processing of your personal information, please contact our offices. We have a complaints resolution policy and procedure which is followed in such instances, and which will be provided to you, so that you are aware of the procedure.

You have the right to submit complaints to the information regulator should you believe there has been a compromise of your privacy or where we have not complied with Regulation in respect of your personal information. The contact details are:
www.inforegulator.org.za
Tel: 012 406 4818
Email: enquiries@inforegulator.org.za