



Protection of Personal Information Act Privacy Policy

This privacy policy applies to the collection, storage, use, disclosure, and protection of personal information.

Vunani Fund Managers (Pty) Ltd.

Registration number: 1999/015894/07

FSP number: 608

("Vunani FM")

1 Introduction

The Financial Advisory and Intermediary Services Act provides for the protection of information of clients, and the Protection of Personal Information Act, 2013, hereafter referred to as (“POPIA”) provides for 8 data protection principles to apply with to ensure the protection of all personal data that relates to companies, staff, service providers and clients. The Promotion of Access to Information Act, 2 of 2000 (“PAIA”) provides for access to such information and in which instances it may be refused.

This policy explains how we collect, store, process / use, disclose and/or share your personal information, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person.

Vunani Fund Managers (Pty) Ltd [“Vunani FM”] is a registered Financial Services Provider with the Financial Sector Conduct Authority, FSP608. We respect your privacy and the confidentiality of your information. We are committed to protecting our clients, suppliers and employees’ personal information and ensuring that all personal information is used appropriately, transparently, securely and in accordance with applicable legislation.

This Policy sets out:

- What information we collect
- How we use your information
- To whom we disclose your information
- How we safeguard your information
- Your rights to access and correction of information
- Retention
- Consent
- Changes to this Notice
- How to contact us

This Privacy Policy and our PAIA manual is available on our website: <https://www.vunanifm.co.za/> or a copy can be requested from VFMs Information officer or compliance, under contact details below.

DEFINITIONS:

- **Information:** means any Data relating to the Data Subject and include reference to personal information.
- **Data Subject:** means the person to whom the personal information relates and can include Clients, potential clients, staff, services providers and/or Company information. “You” / “your” may be applied to all data subjects.
- **Processing:** Any use by any means of a Data Subject’s Information.

2 The Information Collected

Vunani FM collects and process data subject's 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.

In terms of the law, it is mandatory that we collect information directly from you, the data subject. We may also receive your information through your authorised intermediaries.

The type of information we collect will depend on the purpose for which it is intended. We will only collect information that we need for that purpose. Examples of personal information we collect include, but is not limited to:

- Authorised signatories acting on behalf of clients and ultimate beneficial owners, name, identity number, address, and specimen signatures where required.
- Description of client's business,
- Financial information – company banking details,
- Tax numbers, VAT numbers, registration numbers,
- Certificates of incorporation, licence, and registration certificates,
- Contact Information – address, phone number/s and email address
- Any other information required by service providers with whom VFM has a business agreement for VFM to open accounts on behalf of our clients.
- We may monitor and record any telephone calls you make to us.

Where possible, we will inform you what information you are required to provide to us and what information is optional.

VFM may collect additional data from publicly available domains to verify data subject data including but not limited to websites, company directories, publicly available government lists, search engines and similar technology.

Our website does not store usage information or make use of "cookies".

3 How we use your information

Section 9 of POPIA states that "Personal Information may only be processed if, given the purpose for which it is processed, it is accurate, complete, relevant and not excessive."

Vunani FM will use data subject personal information only for the purposes for which it was collected or agreed with you, for example:

- Rendering of financial services (including the rendering of advice or intermediary services) and administrative service, to data subjects
- Improving services and product offerings to data subjects
- Providing information and resources most relevant and helpful to data subjects
- To confirm and verify data subject's identity.
- Ensuring compliance with legislation that required specific information to be collected.
- For the detection and prevention of fraud, crime, money laundering or other malpractice.
- To conduct market or customer satisfaction research or for statistical analysis.

- For audit and record keeping purposes.
- To share information with service providers with whom VFM has a business agreement to process such information on VFM's behalf or to those who render services to VFM.
- In connection with legal proceedings.
- We will use data subject's personal information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise required by law.

CLIENT COMMUNICATION

To keep you informed of important and relevant industry, Vunani FM updates and news we may provide communication to you through electronic communication, which may include email. If you do not wish to receive a specific communication, you may opt-out by following the unsubscribe procedure in such messages. Communication to data subjects requires prior consent being obtained, we may send you an email asking you to opt-into promotional / newsletters without you having opted-into promotional / newsletters.

4 Disclosure of information

All personal information supplied to Vunani FM is treated with strict confidentiality. We may disclose your personal information to companies in the Vunani Group and to our service providers, approved agents, suppliers, and contractors who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may also disclose your information:

- Where we have a duty to comply with applicable laws, regulations, and applicable industry codes.
- For statistical purposes about products, but these will not include any information that will personally identify any data subject.
- Where we believe it is necessary to protect our legal rights.

Vunani FM will never sell, rent, or lease mailing lists or information to third parties.

5 Information Security

Vunani FM, as the responsible party, is legally obliged to provide adequate protection for the personal information we hold and to prevent unauthorised access and use of personal information.

We will, on an ongoing basis, continue to review our security safeguards and related processes to ensure the integrity of the personal information in our possession.

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 information
- Acceptable usage of personal information

- Governance and regulatory issues
- Monitoring access and usage of private information
- Investigating and reacting to security incidents.

When we contract with third parties, we require that they demonstrate the appropriate security, privacy, and confidentiality safeguards to ensure that the integrity of personal information that we remain responsible for, is maintained.

VFM has established working relationships with international counterparties and strategic partners who assist VFM in concluding transactions. We may need to transfer your personal information to another country for processing and storage pursuant to transactions concluded in your interests. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

6 Your Rights: Access and Correction

You have a right to:

- Request confirmation on what personal information we have on record about you.
- Ask us for information about which third parties have access to your personal information.
- Request us to delete or destroy your information, if we are no longer authorised to keep it, or do not have a legal obligation to retain it.
- Ask us to correct or amend your personal information if its inaccurate, excessive, out of date, or incomplete.
- Object to us processing your personal information. Please use Form 1 in the Regulations to POPIA, which is available on the Information Regulator's website at <https://www.justice.gov.za/infoereg/contact.html>.

Please send written requests to the Information Officer, our contact details are below, and specify what information you would like.

We will try to keep personal information we collect as accurate, complete, and up to date as is necessary for the purposes defined in this policy. From time to time, we may request you to update your personal information.

The information officer will take all reasonable steps to confirm / verify your identity before providing any information.

Vunani FM's PAIA Manual sets out the process for access by third parties to a Data subject's information kept by us, and the instances in which it may be refused. A copy of the prescribed request form is attached as Appendix 1 to Vunani FM's PAIA manual, please note that any access request may be subject to a payment of a legally allowable fee.

7 Retention

Any personal information collected shall not be kept on record for longer than is necessary for the purpose for which it was collected, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record or

- the information has been permanently de-identified, so that the information does not relate or cannot be traced back to a data subject.

During the period of retention, we will continue to abide by our non-disclosure obligations.

We may retain your personal information in physical or electronic records at our discretion.

8 Consent

The Data Subject hereby acknowledges that:

Vunani FM is obliged, in terms of, and in accordance with, South African law, including but not limited to the Financial Intelligence Centre Act, 2001 (Act No. 38 of 2001), as amended ("FIC Act"), the Protection of Personal Information Act, 2013 (Act No. 4 of 2013), as amended ("POPIA"), the Consumer Protection Act, 2008 (Act No. 68 of 2008), as amended, the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002), as amended, the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000), as amended ("PAIA"), and the Income Tax Act, 1962 (Act No. 58 of 1962), as amended, to –

- collect, procure, obtain, and receive, directly and/or indirectly, from the data subject or another third party, information of, amongst others, a personal and/or confidential nature; and
- process and/or outsource such information electronically and/or otherwise; and
- store and retain, where applicable, such information; and
- share or disclose, where required or obliged, such information; and

consents to Vunani FM collecting, procuring, obtaining, receiving, processing, outsourcing, storing, retaining, sharing and disclosing, as the case may be, such information in accordance with the laws prevailing from time to time and Vunani FM's prevailing Privacy Policy from time to time, which policy

- is incorporated herein by reference; and
- can be accessed on Vunani FM's website; and
- may be updated from time to time, with such updated version automatically superseding and replacing the previous version, with the data subject hereby undertaking to keep himself/herself or itself up to date with any and all such changes or updates by regularly viewing the applicable page on Vunani FM's website.

undertakes to:

- acquaint himself/herself or itself with Vunani FM's prevailing Privacy Policy from time to time with particular reference to the notification provisions provided for in Section 18 of POPIA and the FIC Act requirements; and
- provide Vunani FM with such information and documentation as may be required, from time to time, by law or to enable Vunani FM to carry out its mandate or perform its duties and undertake its responsibilities.

Vunani FM hereby notifies the data subject, in terms of Section 18 of the POPIA, with such details incorporated herein by reference. Should the data subject not have access to the internet, a copy of Vunani FM's prevailing Privacy Policy can be obtained by requesting a copy by contacting us.

9 Changes to this Policy

Please note that we may amend this policy from time to time. Please check our website periodically to inform yourself of any changes.

10 How to contact us

If you have questions about this policy or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us:

Information Officer	:	Kirsten Elvin-Jensen E-mail – kirstenej@vunanifm.co.za Tel - +27 (0)21 670 4993
Deputy Information Officer	:	Vuyiseka Kulati E-mail - compliance@vunanifm.co.za Tel - +27 (0)21 670 4980
Physical Address	:	1st Floor, Cavendish Links 1 Cavendish Street Claremont 7708
Postal Address	:	PO Box 23261 Claremont 7735
Telephone Number	:	+27 21 670 4900
Website	:	https://www.vunanifm.co.za/
Email address	:	info@vunanifm.co.za

11 Enforcement

Vunani FM uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the principles. Vunani FM encourages interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Data in accordance with the principles.