

## PROTECTION OF PERSONAL INFORMATION

1. "Person" in this Policy refers to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.
2. Definition of Personal Information In terms of the Protection of Personal Information Act, 2013, Personal Information relates to a Person and includes:
  - a. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the Person;
  - b. Information relating to the education or the medical, financial, criminal or employment history of the Person;
  - c. Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the Person;
  - d. Biometric information of the Person;
  - e. Personal opinions, views or preferences of the Person;
  - f. Correspondence sent by the Person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
  - g. Views or opinions of another individual about the Person;
  - h. The name of the Person if it appears with other Personal Information relating to the Person or if the disclosure of the name itself would reveal information about the Person.
3. "Processing" in this Policy include: a. Collection, receipt, recording, storage, updating, modification, retrieval, alteration and use. b. Retrieval by any means of extraction from the System, by way of printing, downloading, screen-printing, photographing or any other way. c. Dissemination by means of transmission, distribution or making available.
4. "System" in this Policy refers to all electronic paper-based systems used by the FFG Group to record interactions with or in relation to Persons to whom financial services are rendered, including all documentation Processed for this Purpose.
5. Consent:
  - a. The following notice is given to Persons in the signature banner of all e-mails from FFG: "By sharing information with us to render a service to you in terms of the Financial and Intermediary Services Act, you give consent for the processing of such information in terms of the Protection of Personal Information Act".
  - b. Personal Information pertains to prospective, current or previous clients. It is information given voluntarily, specific and with the informed expression of will in terms of which permission (Consent) is given for the processing of such information for the Purpose set out below.
  - c. Consent can be withdrawn at any time.
6. FFG is the responsible party in terms of the POPI Act charged with determining the Purpose of processing Personal Information.
7. FFG declares that the Purpose of processing Personal Information is solely and exclusively to enable FFG, its Representatives or other employees to provide financial services or facilitate the process of providing financial services. Only information relevant for its role as an FSP will be Processed and not used directly or indirectly for any other reason whatsoever.

8. An employee who processes Personal Information on behalf of FFG:
  - a. Process such information with the authorisation of FFG. Authorisation is granted implicitly by giving an employee with a Section 13 Authorisation (so-called Broker's appointment) information or login details to the System.
  - b. Employees are instructed to treat Personal Information which comes to their knowledge as confidential and are not authorised to disclose it or use it for any other reason than for the Purpose stated above.
9. Under no circumstances, except in pursuance of the purpose set out above, are employees allowed to retrieve Personal Information from the System in any way or use it in any other way.