



CONSENT TO PROCESS PERSONAL INFORMATION

1. Background

We hereby wish to explain how we acquire, use, retain and disclose your personal information, as is required by the Protection of Personal Information Act 4 of 2013 (referred to as “POPI”). At Blue Key Financial Planning we are committed to protecting your privacy and the integrity of your personal information by dealing with same in a lawful, legitimate and responsible manner.

2. What is personal information?

In terms of POPI, “personal information” is defined as information relating to a natural/juristic person, including, but not limited to:

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- 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;
- the views or opinions of another individual about the person; and
- 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. Purpose of collecting your Personal Information

As an investment management company, your and your colleagues’ personal information may be collected by us for the following reasons, some of which are mandatory:

- to process know-your-client (KYC) and FICA information;
- to administer the investment management agreement signed with your entity;
- to provide you with access to our products and services, including but not limited to analysis or intermediary services in relation to your investment with us;
- to monitor and analyse your conduct relating to that investment for fraud, compliance and other risk-related purposes; § to develop new products and services;

- to help us improve our offerings to you;
- to confirm and verify your identity or to verify that you are an authorised user for security purposes;
- 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;
- in connection with legal proceedings;
- to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law. The type of information we collect shall depend on the purpose for which it is collected and used. We shall only collect information that we need for that particular purpose and no more than necessary. In some instances, we shall inform you what information you are required to provide to us and what information is optional. Primarily, information shall be collected directly from you, however, we may also collect information about you from other sources, with or without your consent. We may collect information about you or your colleagues from sources which are publicly available such as global compliance databases. Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information.

4. Disclosure of your Personal Information

Your personal information is kept confidential, however, under certain circumstances, to ensure the purpose of collection is met, we may lawfully disclose it to the following third parties:

- Service providers;
- Subcontractors;
- Agents;
- Blue Key Financial Planning authorised personnel (including those in subsidiary companies);
- Court of Law;
- Governmental bodies;
- Regulators. We may also disclose your personal information, where we have a duty or a right to disclose in terms of law or industry codes or where we believe it is necessary to protect our rights. The third parties above may sometimes be located outside the Republic of South Africa. We have agreements and security measures in place to ensure that all third parties to whom your personal information is disclosed comply with the terms and provisions of the POPI Act. We ensure that third parties fully understand the duties and obligations they become encumbered with in retaining the privacy and integrity of your personal information.

5. Protecting your Personal Information

In terms of legislation we are obliged to implement measures and strategies

to ensure the protection of your Personal Information, whereby, unauthorised access and use is deterred. Our information security policies and procedures which are reviewed on an ongoing basis include the following:

- 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 personal information; When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is secured. 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. This includes instances where we need to transfer your personal information to another country for processing or storage.

6. Access to/Correction of your Personal Information

You may contact our offices using the details below to enquire what personal information we hold for you. We shall make the information available to you upon request and after reasonable satisfaction that you have confirmed your identity to us. Information Officer:

John Browett

Telephone Number: 039 978 3800

Postal Address: P.O.Box 103, Scottburgh, 4180

Physical Address: 59 Scott Street, Scottburgh, 4180

Email address: john@bluekeyfp.co.za

We are obliged to store information which is accurate and updated. You may contact our offices using the above details to update, correct, amend or delete your personal information at any time. We will take all reasonable steps to confirm your identity before making changes to personal information.

7. Complaints

You have the right to address any complaints you may have regarding your personal information through our normal complaints channels, details of which are available on our website. Alternatively, you may contact the Information Regulator: The Information Regulator

JD House

27 Stiemens Street

Braamfontein

2001

inforeg@justice.gov.za // complaints.ir@justice.gov.za
www.justice.gov.za/inforeg

8. Amendments

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

9. Declaration and informed consent

I declare that all Personal Information supplied to Blue Key Financial Planning for the purposes of processing and administering our investments for related legal and operational reasons is accurate, up-to-date, not misleading and complete in all respects. I undertake to advise Blue Key Financial Planning of any changes to our Personal Information should any of these details change. I hereby permit Blue Key Financial Planning to process our Personal Information, as provided, and acknowledge that I understand the purposes for which it is required and all terms and provisions in this Notice.