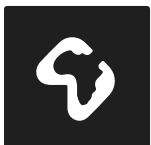


**Sygnia** Limited

# Privacy Policy

**Date of approval:**

June 2024



**Sygnia**

## 1. Introduction

Sygnia cares about the privacy, security and online safety of your personal information. This notice explains how we collect, use, share and protect that information.

In this notice, “Sygnia” refers to Sygnia Limited and all its subsidiaries in the Sygnia Group.

## 2. What is personal information?

Personal information is any information relating to an identifiable living or juristic person. Some examples are: race, gender, marital status, nationality, age, physical or mental health, disability, language, education, identity number, telephone number, email, postal or street address, biometric information and financial, criminal or employment history.

## 3. The information we collect

We collect and process your personal information primarily to provide you with access to our services and products. We collect information directly from you when you provide us with your personal details, for example when you purchase a product or service from us, are members of a fund we administer, submit enquiries or contact us for any other reason.

We may process your personal information on more than one lawful basis, but we will only use your personal information for the purposes for which we have collected it – unless we reasonably consider that we need to use it for another purpose compatible with its original collection.

### 3.1. Cookies

We use cookies on our website. A cookie is a small piece of data that a website stores on the visitor’s computer or mobile device. These data files do not contain personal information, but they do contain a personal identifier that allows us to associate your personal information with a certain device.

We do not store any personal information in our cookies that could be read or understood by other web users. Please note that by deleting or disabling cookies, you may not be able to access certain areas or features of our website.

We use different types of cookies on our website. These cookies may be deleted from your device at different times, such as at the end of your browsing session or after a pre-set amount of time, or they may persist on your device until you delete them.

The different type of cookies we use are:

- Essential cookies: These cookies are required for the operation of our website. Some parts of our website may not work without them.
- Analytical/performance cookies: These cookies allow us to understand how visitors move around our website so that we can improve the way our website works. For example, we use Google Analytics cookies, which report website trends anonymously (i.e. without identifying individual users).
- Social media cookies: These are cookies that integrate with social media platforms. We use them so that content can be shared from our website to your chosen social media platform.

If you would like to delete or disable cookies, please activate the setting on your browser to refuse some or all cookies. Please note, however, that blocking all cookies will block essential cookies and may affect your ability to access some parts of our website.

We will make it clear when we collect personal information, and we will explain what we intend to do with it.

#### 4. How we use your information

We will use your personal information only for the purpose of providing products and services to you and for the purpose for which it was collected or agreed with you, for example:

- to provide our products and/or services to you, to carry out the transactions you request and to maintain our relationship with you;
- to assess and process claims;
- to detect and prevent fraud;
- to comply with auditing and record-keeping requirements;
- to comply with legal and regulatory requirements;
- in connection with any legal proceedings;
- to share information with service providers with whom Sygnia has a business agreement to process such information on Sygnia's behalf or to those who render services to Sygnia.

#### 5. Sharing of your information

We may share your personal information within the Sygnia Group and with service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that all service providers comply with these privacy terms.

We may also disclose your information where we have a legal obligation or duty to disclose your information, or where it is necessary to protect our legal rights.

We will only share your personal information with other third parties if you have consented to such disclosure.

#### 6. How we secure your information

We have put appropriate security measures in place to protect your personal information from being accidentally lost, used, altered, disclosed or accessed in an unauthorised way.

When we contract with third parties, we similarly impose appropriate security, privacy and confidentiality obligations on them to ensure the security of the personal information that we remain responsible for.

#### 7. How long do we keep your personal information for?

We keep your personal information for as long as is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

In some circumstances, you can ask us to delete your personal information. We will delete the information from our operational environment and make sure that it is put beyond use with regards to any backups.

#### 8. Your legal rights

You can request access to personal information we hold about you and ask us to update, correct or delete it. Please note that we may decline your request to delete the information if we are required to keep it in terms of other legislation or if it has been de-identified. You can find more information in the POPIA and PAIA Manual on our website, or you can email [InformationOfficer@sygnia.co.za](mailto:InformationOfficer@sygnia.co.za).

You may object to the processing of your personal information if you think that, in your situation, it will affect your fundamental rights and freedoms. Even if you object, however, we may be compelled by legislation to continue processing your information. In such an instance, we will demonstrate our obligation before continuing to process your information.

You may also request that we suspend the processing of your personal information in the following situations:

- If you want us to establish the information's accuracy;
- If our use of the information is unlawful, but you do not want us to delete it;
- You have objected to the use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Under certain circumstances, you can also request a transfer of your personal data to you or a third party. We will provide your personal information in a structured, commonly used, machine-readable format.

You have the right to unsubscribe from any direct marketing communication we send you.

## 9. International transfers

We may share your personal data with third parties outside of South Africa. Whenever we transfer your personal information out of South Africa, we will ensure that anyone with whom we share your personal information will treat it with the same level of protection that we are obliged to.

## 10. Complaints

If you are unhappy with how we have used your personal information and believe it to be contrary to data protection laws, please get in touch with us immediately. If you are not satisfied with the outcome, you have the right to lodge a complaint with the Information Regulator using the contact details listed below.

### Information Regulator:

T. 012 406 4818

E. [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

## 11. Changes to this notice

We regularly review this Privacy Notice and may change it from time to time; the Privacy Notice is updated regularly on our website.



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Sygnia Financial Services (Pty) Ltd is a licensed Financial Services Provider [FSP 44426]