



POPIA Policies

WEBSITE PRIVACY NOTICE

PHYNANS and its employees are committed to protecting your privacy. We will take all reasonable steps to ensure the confidentiality of your information on our website. We will not collect, collate, process or reveal your personal information without your permission, unless we are legally required to do so. We will only electronically request, collect, collate, process or store your personal information if it is lawful for us to do so. By using this website and transmitting information through the website, you acknowledge that, while we will take every provision to ensure that the user's information is being protected by us, that there are risks associated with this transmission and that subject to the terms and conditions on this website, you are fully aware of such risks.

We will only share non-public personal information with outside parties in limited circumstances permitted by law. Note that we may provide your personal information to third parties to process this information on our behalf. We require that these parties agree to process this information based on our instructions and requirements consistent with this Privacy Statement. We will also not give your personal information to a third party without your consent, unless we are legally required to do so. We will make every effort to ensure that your personal information is kept confidential and secure by storing it on our secure database.

The company's information may be accessed if the system is compromised through unauthorised usage, viruses and other illicit means of obtaining data despite reasonable precautionary measures taken by PHYNANS. We therefore cannot and do not guarantee the security of any information that you transmit on or through our Website. By use of this website you hereby agree that PHYNANS shall not be held liable for any unauthorised disclosures. Our website may make use of cookies, a cookie is a small text file which includes a unique identifier that is sent by a web server to your computer, mobile phone or any other internet enabled device when you visit a website. Cookies are widely used to make websites work efficiently and to collect information about your online preferences. This improves the service we provide to you. Please note that your personal information cannot be collected via cookie technology. This Privacy Policy may be amended from time to time without any notice to you, an updated version will be available on this page.

Guidance note: A privacy notice is a statement made to a data subject that describes how the organization collects, uses, retains and discloses personal information. This privacy statement must be checked against your organisation's privacy policy to ensure that the privacy statement reflects the privacy policy.

PRIVACY AND DATA PROTECTION POLICY

1. INTRODUCTION

The FAIS Act provides for the protection of personal information of Clients; and The Protection of Personal Information Act, 2013 (“POPIA”) provides for 8 Data protection information principles to apply with to ensure the protection of all data that relates to companies, staff and Clients. The Promotion of Access to Information Act, 2 of 2000 provides for access to such information and in which instances it may be refused.

2. PURPOSE

Data privacy and data protection is important to the FSP and this Policy sets out the POPIA principles in line with existing FAIS requirements to ensure the safekeeping of all Data by the FSP and Persons/ Employees/ Parties (as applicable). This Policy applies to all Data obtained via products, services, websites, events operated by the FSP or by any other means.

3. 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, staff and/or Company information.

Processing: Any use by any means of a Data Subject’s Information.

4. THE 8 POPIA PRINCIPLES

Principle 1: Accountability: The FSP must appoint an Information Officer who will be responsible for ensuring that the 8 POPIA information principles are implemented and enforced in the FSP.

Principle 2: Processing Limitation: Only necessary information should be collected, directly from the person to whom the Personal Information relates and with their consent and the processing should be for a lawful purpose.

Principle 3: Purpose specification: Personal Information should be collected for a specific purpose and the Data Subject must be made aware of the purpose for which it was collected.

Principle 4: Further processing limitation: Further processing of Personal Information must be compatible with the purpose for which the information was collected (Principle 3).

Principle 5: Information quality: Reasonable steps must be taken to ensure that all information collected is accurate, complete, not misleading and up to date in accordance with the purpose for which it was collected (Principle 3).

Principle 6: Openness: The Party collecting the information must be transparent and inform the applicable regulator if it is going to process the information and ensure that the Data Subject has been made aware that his/her information is going to be collected.

Principle 7: Security Safeguards: The integrity of the information under the control of a party, must be secured through technical and operational measures.

Principle 8: Data Subject Participation: Data Subjects have the right (free of charge) to request confirmation from the party that holds their information on the details they hold, and may request for it to be amended/deleted.

5. PRACTICAL IMPLICATIONS OF THE POPIA DATA PROTECTION PRINCIPLES

Appointment of the Information Officer:

PHYNANS has appointed an Information Officer who is a senior person in the company, who will be responsible for ensuring that the staff has been properly informed and trained on ensuring the safekeeping and protection of information in the FSP and that the required processes are implemented to ensure compliance.

Information purpose:

The type of information the company collects will depend on the purpose for which the Data is collected and used. We will collect the necessary information from Data Subjects for various purposes, including the following:

- rendering suitable services for e.g. financial services (including the rendering of advice and intermediary services) and administrative services to Data Subjects;
- improving services and product offerings to Data Subjects;
- providing information and resources most relevant and helpful to Data Subjects;
- appointing suitable individuals/ companies to provide financial services/ products to Data Subjects;
- ensuring compliance with legislation that requires specific information to be collected.

Access to Information:

Data Subjects have the right to request a copy of the information that the company hold on them or their business. Should a Data Subject wish to obtain any such information, the Data Subject may request it by contacting the Information Officer on the details provided above. Any such access request may be subject to the payment of an allowable administration fee.

The company will not disclose or share information relating to any Data Subject unless: it is specifically agreed with the Data Subject; it is already publicly available or in the interests of the public; required in terms of Law or if the company believes in good faith that the Law requires disclosure thereof.

PHYNANS PAIA Manual (in terms of the Promotion of Access to Information Act, 2 of 2000) sets out the process for access by third parties to a Data Subject's Information kept by the company, and the instances in which it may be refused.

Collection of Information:

General:

- PHYNANS collects information in various ways e.g. directly from individuals (for example, when purchasing a financial product, registering an account, using a product, or signing up for a newsletter), from employers, publicly available information, through cookies, and/or similar technology.
- Where possible, the company must inform Data Subjects which information they are legally required to provide to PHYNANS and which information is optional.

· With the Data Subject's consent, the company may supplement the information with other information received from other companies and/or organizations such as the South African Revenue Services (SARS) in order to enable PHYNANS to render suitable and proper services to Data Subjects.

User Supplied Information:

The Data Subject may be required to provide some personal information, for example, his/her name, address, phone number, email address, payment card information (if applicable), and/or certain additional categories of information as a result of using/ receiving financial services, purchasing financial products, and using websites and related services. PHYNANS will keep this information in a contact database for future reference, as needed.

Marketing:

The company may use certain information provided by Data Subjects to offer them further services that they believe may be of interest to them or for market research purposes. These services are subject to prior consent being obtained from Data Subjects. If a Data Subject no longer wishes to receive further services or offers from PHYNANS, they may unsubscribe from the services or contact the Information Officer at the contact details provided above.

Usage and Web server logs:

PHYNANS may track information about a Data Subject's usage and visits on the company's website. This information may be stored in usage or web server logs, which are records of the activities on the company's services, products and/or sites. PHYNANS servers automatically capture and save such information electronically. Some examples of the information that may be collected include the Data Subject's:

- o Unique Internet protocol address;
- o Name of the Data Subject's unique Internet Service Provider
- o The city, state, and country from which a Data Subject accesses PHYNANS's website
- o The kind of browser or computer used;
- o The number of links clicked within the site;
- o The date and time of visits to the site;
- o The web page from which the Data Subject arrived on PHYNANS's site;
- o The pages viewed on the site;
- o Certain searches/queries conducted on the site via PHYNANS's services, products and/or websites.

The information collected in usage or web server logs help administer the services, products and sites, analyse its usage, protect the product and/or website and content from inappropriate use and improve the user's experience.

Cookies:

In order to offer and provide a customized and personal service through PHYNANS products and websites, we may use cookies to store and help track information about the Data Subject. A cookie is a small text file sent to the Data Subject's device that the company uses to store limited information about the Data Subject's use of the services, products or website.

The company uses cookies to provide the Data Subject with certain functionality (such as to enable access to secure log-in areas and to save the Data Subject having to re-enter information into product, services or website forms) and to personalize services, products or website content. Without cookies, this functionality would be unavailable.

Retaining Information:

The company may retain personal information for purposes of reporting, administration, monitoring its website or to communicate with Data Subjects.

Information may be retained only to serve the purpose of collecting the information and be deleted/destroyed once the purposes has been fulfilled, subject to other regulatory requirements where Information is to be kept for a specific prescribed period.

Information and records of a personal nature of Clients and/or Employees will be stored for a period of 5 years before being destroyed.

Correcting/ Amending/ Updating/ Deletion of Information:

Data Subjects are required to inform PHYNANS should there be any changes to the information kept.

A Data Subject may request the company to correct, amend, update or delete its Information at any time when applying or making use of any financial products or services by contacting the Information Officer.

PHYNANS will take all reasonable steps to confirm the Data Subject's identity before making changes to information.