



PROTECTION OF PERSONAL INFORMATION

SYGNIA GROUP

1. PREAMBLE

The Protection of Personal Information Act No 4 of 2013 (the Act) aims to give effect to the constitutional right to privacy by safeguarding personal information and regulates the manner in which personal information must be processed. The Sygnia Group regards the lawful and correct treatment of personal information as important to the achievement of our objectives and the success of our business. Sygnia will be legally obliged to protect any personal information we hold for our clients, our suppliers and our employees.

This Notice explains how we will obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act (The Act). This Notice sets out:

- Who we are
- 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
- Changes to this Notice
- How to contact us

2. WHO WE ARE

The Sygnia Group of Companies comprise of six operating companies: Sygnia Life, a life assurance company whose licence is limited to linked investment business; Sygnia Asset Management, a licenced asset management company; Sygnia Collective Investments, a unit trust company; Sygnia Financial Services, a LISP; Sygnia Systems, a financial software provider with a specific focus on the technology requirements of asset management firms and Sygnia Securities, an authorized member of the JSE.

In this Notice, "Sygnia", "Sygnia Group" or "we" refers to one or more of the companies in the Sygnia Group.

3. THE INFORMATION WE COLLECT

We collect and process your personal information mainly to provide you with access to our services and products.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you purchase a product or services from us or when you submit enquiries to us or contact us.

4. HOW WE USE YOUR INFORMATION

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

- to effectively process your transactions;
- to communicate to you in respect of the product purchase or service applied for
- to detect and prevent fraud;
- to comply with auditing and record-keeping requirements;
- to comply with legal and regulatory requirements;
- to verify your identity;
- 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. TO WHOM WE DISCLOSE YOUR INFORMATION

We may disclose your personal information to any company in the Sygnia Group and to our 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.

6. HOW WE SAFEGUARD YOUR INFORMATION

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

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 personal information;
- Investigating and reacting to security incidents.

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 kept secure.

7. YOUR RIGHTS TO ACCESS AND CORRECTION OF INFORMATION

ACCESS TO INFORMATION

You have the right to request a copy of the personal information we hold about you. To do this, contact the Sygnia Client Service Centre on 0860 794 642 (0860 SYGNIA) to review your personal information. We will take all reasonable steps to confirm your identity before providing details of your personal information. Please note that any such access request may be subject to a payment of a legally allowable fee.

CORRECTION OF YOUR INFORMATION

You have the right to ask us to update, correct or delete your personal information. You may do this by contacting the Sygnia Client Service Centre on 0860 794 642 (0860 SYGNIA) and requesting the correction or deletion of any information we hold. We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.

8. CHANGES TO THIS NOTICE

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

9. HOW TO CONTACT US

If you have questions about this Notice 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 at the following number:

Client Service Centre on 0860 794 642 (0860 SYGNIA)