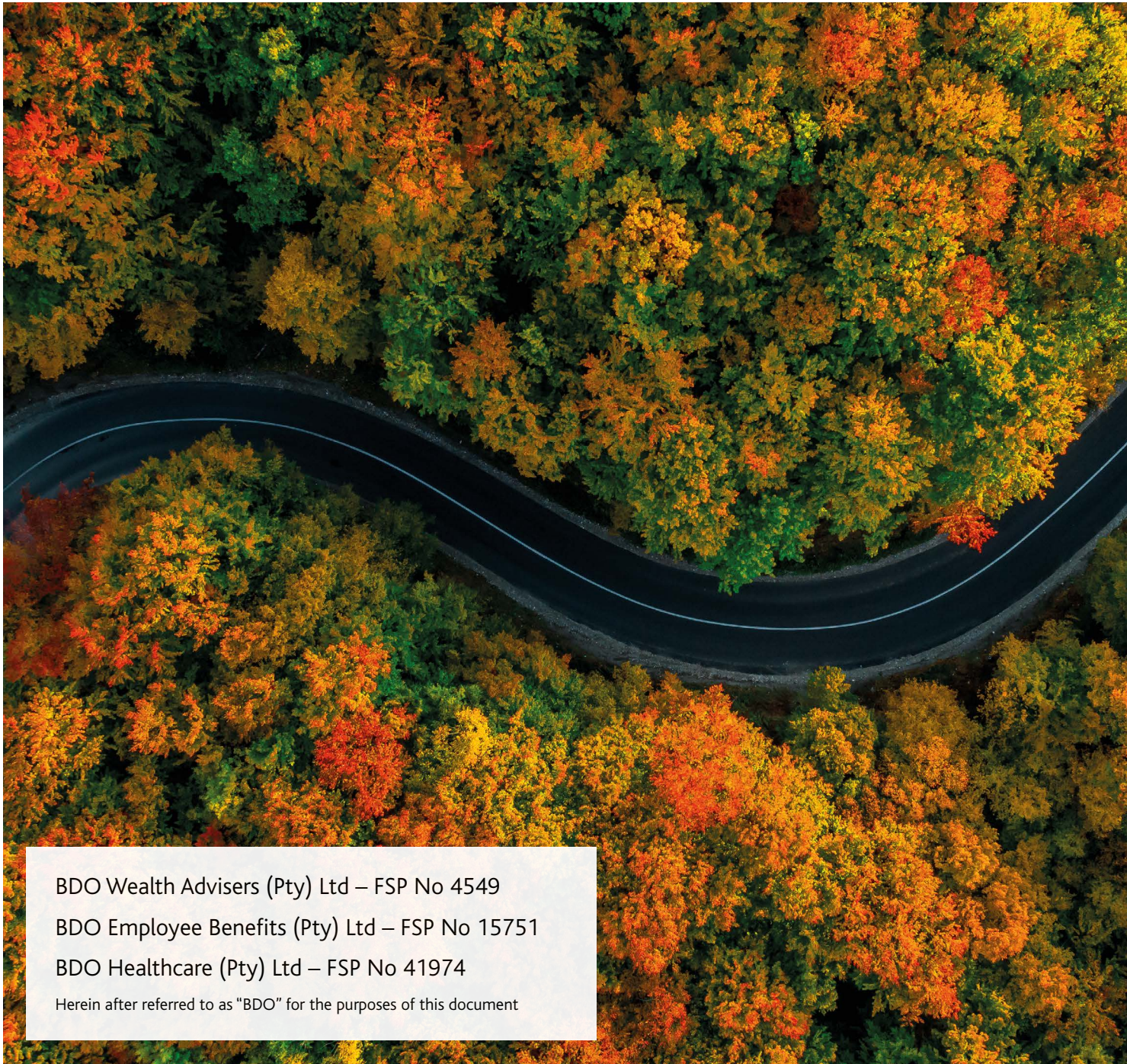




BDO WEALTH ADVISERS | BDO EMPLOYEE BENEFITS | BDO HEALTHCARE

POPIA POLICY

PROTECTION OF PERSONAL INFORMATION POLICY



BDO Wealth Advisers (Pty) Ltd – FSP No 4549
BDO Employee Benefits (Pty) Ltd – FSP No 15751
BDO Healthcare (Pty) Ltd – FSP No 41974
Herein after referred to as “BDO” for the purposes of this document

1. SCOPE

BDO is a responsible party as defined in the Protection of Personal Information Act 4 of 2013 (POPIA) and is obliged to comply with the provisions of this Act.

2. PURPOSE

POPIA requires BDO to inform data subjects (person(s) whose personal information it has access to) as to how Personal Information is used, disclosed, and destroyed.

This Policy sets out how BDO deals with their data subjects' Personal Information and additionally for what purpose the said information is used.

3. BACKGROUND

Personal Information broadly means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a specific natural or juristic person (data subject).

4. POLICY

BDO guarantees its commitment to protecting their data subjects' privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.

THE POPIA PRINCIPLES THAT WE SUBSCRIBE TO:

1. Obtain and process information fairly.
2. Keep information only for one or more specified, explicit, and lawful purposes.
3. Use and disclose information only in ways compatible with these purposes.
4. Keep information safe and secure.
5. Keep information accurate, complete, and up to date.
6. Ensure that information is adequate, relevant, and not excessive.
7. Retain information for no longer than is necessary for the purpose or purposes.
8. Provide a copy of personal data kept to the data subject on request

5. PROCEDURE

5.1 PERSONAL INFORMATION COLLECTED

BDO will generally collect some of the following personal information from our data subjects:

- Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, age, physical or mental health, well-being, disability, language, and birth.
- Information relating to the education, medical, financial, criminal or employment history.
- Identifying number, name, symbol, e-mail address, physical address, telephone number, location information.
- Biometric information (employees).
- Correspondence sent/received 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 our data subject.

We have agreements in place with all our products suppliers, and third-party service providers to ensure that there is a mutual understanding with regards to the protection of Personal Information.

We may also supplement the information provided with information we receive from other providers to offer a more consistent and personalised experience in clients' interaction with us.

5.2 HOW PERSONAL INFORMATION IS USED

Personal Information will only be used for the purpose for which it was collected and agreed. This may include:

- Providing a product / service to a data subject.
- As part of employee on-boarding or any other internal human resources function.
- Conducting credit reference searches or verification.
- Confirming, verifying, and updating contact details.
- For the detection and prevention of fraud, crime, money laundering or other malpractice.
- For audit and record keeping purposes.
- In connection with legal proceedings.
- Providing our services to a data subject to carry out the services requested and to maintain and constantly improve the relationship.
- Providing communications in respect of BDO and regulatory matters that may affect data subjects; and
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.
- To carry out the transaction(s) requested
- For underwriting purposes
- Assessing and processing claims.
- For purposes of claims history.
- Conducting market or customer satisfaction research.

In terms of the provisions of POPIA, Personal Information may only be processed if certain conditions are met, which are listed below, along with supporting information for FSP NAME processing for Personal Information:

- Data subject consents to the processing – consent only required where the information will be used for something other than the intended use for which the information is supplied.
- The processing is necessary.
- Processing complies with an obligation imposed by law on BDO.
- Processing protects the legitimate interest of the data subject.
- Processing is necessary for pursuing the legitimate interest of BDO or of a third party to whom information is supplied.

5.3 DISCLOSURE OF PERSONAL INFORMATION

We may disclose a data subject's Personal Information for a reason it was not intentionally supplied for where we have a duty or a right to disclose in terms of the law or where it is may be necessary to protect our rights.

We have agreements in place to ensure that they comply with confidentiality and privacy conditions.

We may also share client Personal Information with and obtain information about clients from third parties for the reasons already discussed above.

5.4 SAFEGUARDING PERSONAL INFORMATION

It is a requirement of POPIA to adequately protect the Personal Information we hold and to avoid unauthorised access and use of your Personal Information. We will continuously review our security controls and processes to ensure that your personal Information is secure.

When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them to ensure that your Personal Information is kept secure.

We may need to transfer your (electronic) Personal Information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with a similar level of protection as afforded to you by us.

5.5 ACCESS AND CORRECTION OF PERSONAL INFORMATION

Data subjects have the right to access the Personal Information we hold about them. Data subjects also have the right to request us to update, correct or delete their Personal Information on reasonable grounds. Once a data subject objects to the processing of their Personal Information, BDO may no longer process said Personal Information. We will take all reasonable steps to confirm our data subject's identity before providing details of their Personal Information or making changes to their Personal Information. BDO's Management Team will be responsible for managing this process.

5.6 MANAGEMENT TEAM

THE DETAILS OF OUR MANAGEMENT TEAM ARE AS FOLLOWS:

Chief Operating Office Ricardo Teixeira

Operations Manager Andriesa Hills

Practice Manager Lizanne van Eeden

Business Manager David Crossley

OUR MANAGEMENT TEAM IS CONTACTABLE AT OUR HEAD OFFICE:

Telephone Number: 011 488 1700

Physical Address: BDO, Wanderers Office Park, 52 Corlett Drive, Illovo, Johannesburg, 2196

6. CONSEQUENCES OF NON-ADHERENCE

Staff members who do not treat the Personal Information of data subjects with the utmost confidentiality will be subject to disciplinary procedures.

7. TRAINING AND AWARENESS

Staff members will receive a copy of this policy on employment. Staff that deals with the Personal Information of data subjects will receive training on this policy.

8. APPROVAL AND REVIEW

This policy was approved by the Board of Directors during a meeting held on 15 April 2021, and will be reviewed as and when required.