
PROTECTION OF PERSONAL INFORMATION DATA PRIVACY STATEMENT

Robson Savage (Pty) Ltd (“Robson Savage”) shall take all reasonable measures to protect your personal information – for the purpose of this notice “personal information” shall have the meaning set out in the Protection of Personal Information Act, Act 4 of 2013 (“POPIA”) and the Promotion of Access to Information Act, Act 2 of 2000 (“PAIA”).

These Acts can be found online at <https://www.justice.gov.za/infoereg/legal.html>.

This data privacy statement explains how Robson Savage processes the personal information collected from you and informs you of your rights in terms POPIA.

PERSONAL INFORMATION PROCESSED BY ROBSON SAVAGE

Depending on which part of our business you are dealing with, the activity that is being undertaken or the relationship you have with Robson Savage, the following types of personal information may be processed:

- name
- South African identification number, passport number, employee number
- nationality
- contact details – residential, business and email addresses and telephone numbers
- gender
- date of birth
- relevant dates relating to your employment and fund membership
- marital status
- tax number
- bank account details
- financial information
- dependant details

In addition to the above, the following personal information may be processed with regards to employees, prospective employees and shareholders:

- race (for employment or regulatory purposes only)
- qualifications

- employment history

We may also process information disclosed in divorce and maintenance orders, and information relating to the distribution of death benefits.

Where applicable, Robson Savage shall obtain prior authorisation from the Information Regulator before processing personal information.

PURPOSE OF PROCESSING PERSONAL INFORMATION

Robson Savage may collect, store, use, disclose and transfer your personal information primarily for the following purposes:

- To communicate requested information to you, your employer, your financial intermediary or other authorised representative
- To provide retirement fund and intermediary services as permitted by legislation and in terms of contractual obligations
- To provide investment management and investment administration services to you as requested
- To meet regulatory obligations such as is contained in (although not limited to) the Financial Intelligence Centre Act, 2001 and the Financial Advisory & Intermediary Services Act, 2003
- Human resource management
- Financial, regulatory and tax reporting

THIRD-PARTY PROCESSING

Some personal information may be provided to third party service providers to whom certain functions have been outsourced in order to fulfil legislative or contractual obligations. Such personal information is processed only on the basis that it is required in order for the third party to render its service in terms of a service agreement with the relevant party. Contracts with third-party service providers mandate the protection of personal information required by the POPIA, with on-going due diligence of adherence to the contractual requirements.

YOUR RIGHTS AS A DATA SUBJECT

Robson Savage recognises that all data subjects have the following rights regarding their personal information:

- The right to expect that Robson Savage will use their personal information appropriately, transparently, and securely, and in line with the conditions for lawful processing set out in the POPIA
- The right to establish whether Robson Savage holds personal information related to them, including the right to request access to that personal information
- The right to request, where necessary, that their personal information be corrected or deleted where Robson Savage is no longer authorised to retain the personal information, subject to any applicable legislation or contractual obligations
- The right to submit a complaint to the Information Regulator regarding an alleged infringement of any of the rights protected under the POPIA and to institute civil

proceedings regarding the alleged non-compliance with the protection of their personal information

- The right to be notified in any situation where Robson Savage has reasonable grounds to believe that the personal information of the data subject has been accessed or acquired by an unauthorised person

SECURITY SAFEGUARDS

The information Robson Savage maintains concerning data subjects is stored in secure databases that have built-in safeguards to ensure its privacy and confidentiality. Your personal information is strictly access-controlled, with access granted to identified authorised persons only.

DATA SECURITY BREACHES

In the event of a security compromise where your personal information has been accessed or acquired by an unauthorised person, Robson Savage will notify you as soon possible as provided for in the POPIA.

PROMOTION OF ACCESS TO INFORMATION

Robson Savage's manual prepared under the PAIA is available on our website at <https://www.robsav.com/media/9344/robson-savage-paia-manual.pdf>

COMPLAINTS

If you have any questions or wish to complain about the processing of your personal information, or if you wish to exercise any of your rights as a data subject, you can contact Robson Savage's Information Officer using the following contact details:

Name:	Neil Savage
Email address:	home@robsav.com
Landline:	011 643 4520
Postal address:	PO Box 3041, Houghton 2041

CONCLUSION

We have always taken the greatest care to protect and secure your personal information and to use it only for the purposes for which it was collected. We want to assure you that we continue to ensure the security of your personal information by way of a range of technical and organisational measures and controls.

Visit us at www.robsav.com