

**PRIVACY STATEMENT IN TERMS OF PROTECTION OF PERSONAL INFORMATION ACT, No 4 of
2013 (POPI ACT)**

Effective Date: 5th December 2025

1. PURPOSE OF POLICY

1.1 This policy applies to information relating to our identifiable data subjects (both natural and juristic persons), in terms of the Protection of Personal Information Act, 2013. Dyversity Wealth Partner's (DWP) data subjects include our clients, prospective clients, employees and third parties with whom we engage to facilitate the provisions of our services.

1.2 We are committed to:

- keeping your personal information secure while it is in our possession and control, and
- ensuring we will take every reasonably practicable step to ensure that it is complete, accurate, not misleading and updated where necessary.

1.3 We also aim to ensure that your legitimate concerns regarding the way in which your personal information may be used are considered. In addition to being transparent, we seek to provide you with as much information as necessary to give assurance as to what information is in our possession and how it is used.

2. THE PERSONAL INFORMATION WE COLLECT ABOUT YOU

2.1 The POPI Act defines personal information as "recorded information about an identifiable individual that may include his or her name, address, email address, phone number, race, nationality, ethnicity, origin, religious or political beliefs or associations, age, sex, sexual orientation, marital status, family status, identifying number, code, symbol, finger prints, blood type, inherited characteristics, health care history including information on physical/mental disability, education, financial, criminal, employment history, others' opinion about the individual, and personal views except those about other individuals".

2.2 The information we collect about you can vary depending upon the nature of your relationship with

us, i.e. if you are an employee, prospective client, client or third-party providing services to us. We will always obtain your permission regarding the collection and processing of your personal information and will limit it to the minimum of what is lawfully required to enable the process for which it is being gathered.

2.3 The POPI Act includes the following activities in processing: collection, receipt, recording, organisation, collation, storage, updating, modification, retrieval, alteration, use, dissemination and merging.

3. CLIENT INFORMATION

3.1 Personal Information obtained from our clients (and prospective clients) and the processing of that information is to:

- ensure compliance with legislative obligations
- enable the provision of the services that we offer, and
- assist in improving our offering to clients.

3.2 The type of information that we collect will depend on the purpose for which it is collected and used. We will only collect information that is required for the purpose of rendering services to our clients and to ensure compliance.

3.3 Required information is collected directly from clients. Where possible, we will inform the client of the information required and the reasons for which it is needed. We may also request optional information and will advise clients if this is the case.

3.4 With our client's consent, we may further process personal information by supplementing the information provided to us with information received from other companies and/or organisations such as the South African Revenue Services (SARS) to enable us to render services to our client.

4. EMPLOYEE INFORMATION

4.1 We collect personal information about our employees to facilitate the employment process and to ensure compliance with legislation and the successful operation of our ongoing business processes.

4.2 With employees' consent, we may also supplement the information provided by employees, with information received from other verifiable independent third-party companies and/or organisations who have the necessary authority to do so, such as the South African Revenue Services (SARS) and Home Affairs to enable DWP to comply with legislation.

5. HOW WE USE OUR CLIENT AND EMPLOYEE INFORMATION

5.1 We use clients' and employees' information only for the lawful purposes for which it was collected or agreed upon, for example:

- to provide services to clients
- to carry out transactions that our clients request
- for our legitimate business interests such as preventing financial crimes, preventing fraud and maintaining security of our services
- for compliance with a mandatory legal obligation
- for audit and record keeping purposes
- in connection with legal proceedings.

5.2 We may disclose clients' information:

- Where there is a duty or a right to disclose in terms of law
- Where we believe it is necessary to protect our rights
- Where the client has requested it to be done.

6. CLIENTS' PERSONAL INFORMATION RIGHTS

6.1 In terms of lawful processing of personal information, clients have the right to:

- Notification – to be notified that the personal information is being collected or accessed or acquired by an unauthorised person
- Access – the right to establish at no cost, what personal information is being held by DWP and to be given access to it
- Request information correction and destruction
- Object – a client may object on reasonable grounds to the processing of information in their situation
- Profiling – the right not to be subject, under certain circumstances to a decision made solely because of automated processing intended to provide a profile
- Complaints – to submit a complaint to the Regulator relating to interference with protection of the client's personal information (see the contact details below).
- Civil proceedings – the right to institute civil proceedings related to the alleged interference with protection of personal information.

7. HOW PERSONAL INFORMATION IS PROTECTED

- 7.1 We will take reasonable precautions in line with global information technology best practices to protect your personal information from loss, issue, unauthorised access, disclosure, alteration and destruction.
- 7.2 We have deployed best of breed security measures ensuring restricted access. DWP only permits digital storage in a backed-up cloud environment. Our systems and digital environment is under ongoing surveillance to ensure effective protection of our systems and information.
- 7.3 We do not engage in any transfers or sale of any client information in any manner. Limited personal information may be transferred to authorised third parties for the specific purpose of facilitating the provision of services as provided for within a client mandate or to meet our legal and regulatory obligations.

8. INTERNATIONAL DATA TRANSFERS

- 8.1 We do transfer personal information across the borders including but not limited to the European Union, United Kingdom and Channel Islands, United States of America, Mauritius and Australia where it is required for our purpose which includes amongst others achieving our business function and, providing our service offering as requested by our clients.
- 8.2 We will only engage in the cross-border transfer of personal information if one of the following conditions are met:
- the recipient is subject to existing legislation in their country, to a binding corporate or binding agreement that provides an adequate level of protection for the personal information that is substantially similar to the data protection laws applicable to South Africa.
 - our client has consented to such cross-border transfer
 - the transfer is necessary for the conclusion and performance of the contract between us and the client and or an authorised third party
 - the transfer is for the benefit of the client.
- 8.3 The processing of personal information in foreign jurisdictions may be subject to laws of the country in which it is held and may be subject to disclosure to governments, courts of law, enforcement agencies or regulatory agencies of such other country pursuant to the laws of such country.

9. WHO HAS ACCESS TO THE PERSONAL INFORMATION

- 9.1 Access to personal information is granted according to specific work functions and operational requirements within our business. Audit functionality is available to assist in scrutinising activities and further protect information from compromise.
- 9.2 Employee employment contracts are further supported with training in confidentiality of information and disclosure of any information beyond what is permitted is viewed as a serious breach of contract. Any unauthorised disclosures of personal information will lead to disciplinary action commensurate with the information breach.
- 9.3 Legitimate interest requires that we verify both prospective client and client personal information to comply with binding legal obligations imposed by government and regulatory authorities. Companies such as the South African Revenue Services (SARS) or verification agencies enable us to render services to our client. To provide our services, we are obliged to share personal information with these entities and where necessary and required, data protection agreements are concluded.
- 9.4 Employee information may also be shared with independent contractors or third-party service providers who require it to perform their roles or services. Where necessary and required, data protection agreements are concluded.
- 9.5 Clients and employees are entitled to request copies of any personal information that we may hold about them. Should information be required, a request can be lodged using the contact details below. It is also recommended to read our PAIA manual which provides further detail on access to information.

10. UPDATING PERSONAL INFORMATION

- 10.1 We are required to maintain updated and accurate personal information at all times. Regulatory requirements impose further obligations on maintaining accurate records. You will be contacted periodically to facilitate our ongoing compliance.
- 10.2 Conversely you are entitled to request that your information is corrected, amended, deleted or destroyed, subject to compliance with the POPI Act record keeping provisions. We will follow formal internal procedures to ensure that legitimate requests are acted on.

11. RECORD KEEPING

- 11.1 We will not retain your personal information for any longer than necessary for achieving the purpose

for which your personal information was collected and or subsequently processed, unless:

- keeping it is required or authorised by law
- we reasonably require it for lawful purposes related to our function or activities
- it is required by a contract that we entered with you, or
- you or a competent person consented to the retention of personal information relating to a child.

11.2 Regulation requires that all records are stored for a period of 5 years after your relationship with us has come to an end. Thereafter it may be destroyed, bearing in mind that we do not maintain any hard copy records of information.

12. CHANGE OF OWNERSHIP

If we undergo any change of ownership, or a merger with another entity or a sale of assets to another entity, we may assign our rights to the personal information which we process to a successor, purchaser or separate entity. We will disclose this change of ownership in advance and data subjects may elect to request deletion of their personal information, subject to the provisions of the POPI Act and our internal procedures.

13. HOW TO CONTACT US

If a data subject has a query regarding this Privacy Policy, or needs further information about DWP's privacy practices, or they wish to withdraw consent, correct personal information, please contact the Information Officer, Carol Axten at carolaxten@dyversity.co.za.

The Information Regulator (South Africa)

Woodmead North Office Park
54 Maxwell Drive
Woodmead
Johannesburg, 2191

Email: enquiries@inforegulator.gov.za

Complaints email: complaints.IR@justice.gov.za