

**ITRANSACT FUND MANAGERS (RF) (PTY) LTD****PRIVACY NOTICE – PROTECTION OF PERSONAL INFORMATION ACT (“POPIA”)****1. Introduction**

The privacy of your personal information is important to us and we are committed to safeguarding and processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer.

You can request access to the information we hold about you at any time and if you think that we have outdated information, please request us to update or correct it.

**2. Contact details**

<b>Information Officer:</b>	Mark Baisley
<b>Deputy Information Officer:</b>	Curtis McBride
<b>Deputy Information Officer:</b>	Boitshwarelo Galorale
<b>Phone number:</b>	011 561 6600
<b>Fax number:</b>	011 388 1182
<b>Email address:</b>	<a href="mailto:IOfficer@aospartner.com">IOfficer@aospartner.com</a> / <a href="mailto:compliance@aospartner.com">compliance@aospartner.com</a>
<b>Physical address:</b>	15 Philips Street Ferndale Randburg, 2194
<b>Postal address:</b>	P.O. Box 4769 Randburg 2125
<b>Website:</b>	<a href="http://www.itransactfm.co.za">www.itransactfm.co.za</a>

**3. Responsible party**

Itransact Fund Managers (RF) (Pty) Ltd is an authorised Collective Investment Scheme Manager under the Collective Investment Schemes Control Act 45 of 2002.

#### **4. The source of collection of your personal information:**

We collect personal information directly from the following data subjects: or from an authorised representative of the data subject:

- Prospective clients who enquire about our services
- Clients who have appointed the representative as their broker
- Unit holders who invest with IFM
- Authorised Representative of the data subject

Personal information is collected directly from you through the completion of an application form, online forms or during consultation with your authorised representative. These forms are completed either electronically or in hard copy.

We may also collect information about you from other sources such as external third parties and from cookies on our website.

#### **5. Law authorising or requiring collecting of the personal information:**

As an authorised financial services provider, we are obligated in terms of the following legislation to collect your personal information insofar as it relates to the rendering of the relevant financial services to you:

- Collective Investment Schemes Control Act 45 of 2002
- Financial Advisory and Intermediaries Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001

#### **6. Purpose for processing your information:**

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Complying with the obligations contained in the contract concluded between yourself and IFM.
- Providing you with products and services that suit your needs, as requested.
- To verify your identity.
- To issue, administer and manage your investment products.
- To notify you of new products or developments that may be of interest to you.
- To confirm, verify and update your details.

- To comply with any legal and regulatory requirements.

Some of your information that we hold may include, your first and last name, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, occupation, residency status, your investments and your banking details.

Some of the aforementioned personal information may be mandatory to provide within the context of the above-mentioned legislation.

Failing to provide compulsory information may lead to IFM's inability to carry out the functions necessary to perform as an authorised collective investment scheme.

## **7. Third parties and your personal information**

We may need to share your information to third parties to provide reports, analyses, products or services that you have requested. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us.

These third parties may include:

- Client due diligence tools;
- Bank Verification processes;
- Sanction Screening tools;
- Tracing Agents;
- The Compliance Officer of the organisation (where applicable);
- Analytics and search engine providers assisting in the enhancement of our websites;
- Information Technology specialists assisting us with data storage, security, processing, analytics, etc;
- Auditors of IFM;
- Regulatory or governmental authorities such as the Financial Sector Conduct Authority and the Prudential Authority.

## **8. The transfer of your personal information outside of the Republic of South Africa**

Your information may be hosted on servers managed by a third-party service provider, which may be located outside of South Africa.

We confirm that the level of protection afforded to your personal information by that third country or international organisation is equal to the protection afforded by the POPI Act.

## 9. Complaints and objections

As a data subject, you have the right to –

- Request that we confirm, free of charge, whether or not we hold personal information about you,
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed
- In terms of section 2 of POPIA, requests us to correct or delete your personal information that is inaccurate, irrelevant or out of date.
- Request that we consider your objections to the processing of your personal information.
- Lodge a complaint with the Information Regulator.

## 10. Marketing

You may object to the processing of your personal information for marketing purposes at any time.

## 11. Security breaches

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

## 12. The Information Regulator

In the event that your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information Regulator.

For further information regarding the complaints process, please visit the website of the Information Regulator, as indicated below.

Alternatively, you may contact the Information Regulator for further assistance:

**The Information Regulator:** Adv Pansy Tlakula

**Physical address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

**Email:** complaints.IR@justice.gov.za

**Website:** <https://www.justice.gov.za/inforeg/index.html>