



2021

Privacy Statement

Privacy Policy

THE PROTECTION OF PERSONAL INFORMATION ACT

CUSTOMER PRIVACY NOTICE

1. INTRODUCTION

- 1.1 AOS Wealth (PTY) LTD (hereafter “AOS” or “we” or “us” or “our”) respects your privacy and the protection of your personal information is important to us. We are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection.
- 1.2 This privacy statement, together with the POPIA & PAIA manual, aim to let you know how AOS will treat any personal information that it may have about you and how you can access such personal information held. Reference made to “POPIA” means the Protection of Personal Information Act 4 of 2013 and reference made to “PAIA” means the Promotion of Access to Information Act 2 of 2000 as amended.
- 1.3 We prioritise our security safeguards to protect your personal information and to ensure that we process your personal information in an appropriate manner and for legitimate purposes.
- 1.4 We reserve the right to amend this privacy statement at any time, without prior notice, by posting the amended statement on our website.

2. COLLECTION OF PERSONAL INFORMATION

- 2.1 You may only send us your own personal information or the information of another person where you have their permission to do so.
- 2.2 We will collect your personal information from you as part of the client onboarding process, which is either via through correspondence in person, via email or telephone. The type of information which we require depends on the nature of the instruction, the specific product offering and our internal, legal, and regulatory requirements as it may change from time to time.
- 2.3 The type of personal information we collect will depend on the purpose for which it is collected and used. The specific purpose for which the information is collected will be apparent from the context in which the information is requested including but not limited to your name and surname, identity or passport number, banking details, postal or street address, title, contact numbers or e-mail address.
- 2.4 Where possible, we will inform you what information is voluntary or mandatory for you to provide to us and the consequences for failing to provide the requested information.
- 2.5 We may collect website usage information using “cookies” which allows us to collect standard internet visitor usage information.

3. HOW WE USE YOUR INFORMATION

- 3.1 We will use your personal information only for the purposes for which it was collected and agreed with your consent. In addition, where necessary your information may be retained for legal or research purposes.
- 3.2 The purposes for which we process personal information includes, but is not limited to:
 - i. Respond to your query.
 - ii. Gather contact information.

- iii. Confirm and verify your identity or to verify that you are an authorised user for security purposes.
- iv. For the detection and prevention of fraud, crime, money laundering or other malpractice, and for the purposes of general background checking.
- v. To conduct market or customer satisfaction research or for statistical analysis.
- vi. For audit and record keeping purposes.
- vii. In connection with legal proceedings.

4. DISCLOSURE OF INFORMATION

4.1 AOS may disclose your personal information to third parties in certain circumstances, which include, but are not limited to:

- i. Where we have your consent.
- ii. Where we are required to do so by law.
- iii. To our service providers who are involved in the delivery of products or services to you, where we have agreements in place to ensure that they comply with these privacy terms.
- iv. Where we believe it is necessary to protect our rights.

4.2 We may also collect additional information from you from third party sources who have been appointed to deal with your portfolio on your behalf and who are duly authorised to disclose your personal information.

5. TRANSFER OF INFORMATION

5.1 With your consent, we may need to transfer your 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 similar protection as provided for in the POPIA.

6. STORAGE AND DESTRUCTION OF YOUR PERSONAL INFORMATION.

We will retain your personal information for the duration that you are a client of AOS. After you cease to be a client, we may keep your data up to a maximum of five years:

- i. To comply with retention requirements imposed by any law; and
- ii. For record keeping for the services rendered to you.
- iii. In the event of any litigations or for other legal reasons, we may be required to retain your personal information.

7. INFORMATION SECURITY

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

7.2 Our security policies and procedures cover, but are not limited to:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications; TLS to ensure end to end encryption
- Security in contracting out activities or functions;
- Password protected documents
- Monthly security report, audited

- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

7.3 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.

7.4. AOS has implemented procedures to address actual and suspected data breaches and undertake to notify you and the relevant regulatory authorities of breaches in instances in which AOS is legally required to do so and within the period in which such notification is necessary.

7.5. Notwithstanding paragraph 7.2 above, to the extent permissible by law, we shall not be liable for any loss, claim and/or damage arising from any unauthorised access, disclosure, misuse, loss, alteration, or destruction of your personal information.

8. CLIENT RIGHTS

8.1 Subject to the POPIA provisions, you have the right to:

- i. Request access to your personal information.
- ii. Request, where necessary, the correction, destruction, or deletion of your personal information.
- iii. Object to the processing of your personal information.
- iv. Submit a complaint to the Information Regulator regarding the alleged interference with the protection of the personal information.
- v. Institute civil proceedings regarding the alleged interference with the protection of your personal information.

8.2 For access, corrections, destruction, or deletion of your personal information, simply contact us at the numbers/addresses as provided on our website and specify what information you require. We will need a copy of your ID document to confirm your identity before providing details of your personal information.

Enquiries

If you have any questions or concerns based on this Privacy Statement or regarding the way in which we handle personal information, please contact us at info@aoswealthsa.co.za