



# Privacy Policy

Stephen Cloete and Associates CC will maintain the confidentiality of your personal information and comply with the Protection of Personal Information Act 4 of 2013 (POPIA) when processing your personal information. The purpose of this notice is to inform our clients about the type and use of personal information that we collect, the ways in which it is collected, the sharing, protection and storage thereof.

## What information do we collect from you?

Personal information means any information that may be used to identify an individual, including, but not limited to; a first and last name, e-mail address, a home, postal or other physical address, other contact information, title, birth date, gender, occupation, tax information, investments, assets, liabilities, insurance and other information needed to provide a service that you requested;

Record of correspondence from you or anyone acting on your behalf;

Details on transactions you carry out with us.

## How and why do we collect your information?

Stephen Cloete and Associates CC may collect your information in a number of ways that include:

### Information that you volunteer

You may be required to provide certain information to enable Stephen Cloete and Associates CC to:

- Process your information to provide you with the product(s)/service(s) that you have requested, manage our relationship with you, act on your instructions and notify you of any changes to our services;
- Verify your identity in terms of our obligation under the Financial Intelligence Centre Act, 38 of 2001;
- Detect and prevent fraud to the extent that we are in a position to do so;
- Comply with any laws or regulations, including law enforcement, government and tax collection agencies, treaties and codes;
- Assist in improving our products and/or services; and
- Refer you to a Stephen Cloete and Associates CC associated company.

### Automatic collection

To monitor and improve the website, Stephen Cloete and Associates CC may use technology to gather information about your use of the website including details of your operating system, browser version, domain name, and IP address (the IP address is a string of numbers that tells us which server you are using but does not identify you).

The process of gathering the information as described immediately above uses a technology known as "cookies". If you do not wish us to collect the information your browser should allow the disablement of cookies.

## How long do we store your information?

Stephen Cloete and Associates CC is required to ensure that your personal information is accurate and maintained in a secure environment for a period of time no longer than is necessary for the purposes for which we are processing your personal information.

As a general rule this means that Stephen Cloete and Associates CC will retain your information for a period of 5 years after the termination of our services with you. However, we may be required to retain your information for longer where we are required to do so for tax, legal, regulatory, complaints or accounting purposes.

## Sharing your personal information

During the course of the relationship, Stephen Cloete and Associates CC may disclose your information to the following third parties:

- Stephen Cloete and Associates associated companies;
- Third parties that provide Stephen Cloete and Associates with services, including technical support, products, hosting services, reporting services and general services that may be related to the product/service that we provide you;
- Professional advisers, judicial, regulatory and law enforcement bodies; and
- A third party that may acquire all or part of our assets or shares, or that succeeds us in carrying on all or part of our business.

## Cross Border transfer of information

We are based in and operate from South Africa, and, regardless of where you use or access our platforms, or services, your information may be transferred to and maintained on servers located elsewhere in the world. Please note that any information we obtain about you will be stored in accordance with South African data privacy laws, regulations and standards, which may not be equivalent to the laws in your country of residence. By providing your information to us or by using our platforms you consent to the processing and transfer of your information to a location outside of South Africa where we may store it and where our suppliers may process it on our behalf.

We may transfer your personal information to places outside of South Africa and store it there, where our suppliers may process it. If this happens, we require our suppliers to apply the same security standards as when we process your information in South Africa.

Your consent to this Privacy Notice followed by your submission of such information to us, represents your agreement to such transfer.

We will take all reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Notice.

## Accessing your personal information

In terms of the Promotion of Access to Information Act, 2 of 2000, you have the right to request the details of your personal information that we hold. The fees associated with such request are prescribed in terms of this Act. Confirmation of whether we hold your personal information may be requested

free of charge. For further information on how to request access to your personal information, please request a copy of our Promotion of Access to Information Act Manual by emailing - [info@scainsure.co.za](mailto:info@scainsure.co.za)

## Your data protection rights

In terms of the Protection of Personal Information Act, 4 of 2013 and the Promotion of Access to Information Act, 2 of 2000, you have the right to:

Request that your Personal Information which we have collected be corrected, reduced, returned or deleted, subject to any other law/regulation that may require Stephen Cloete and Associates to retain such information.

Stephen Cloete and Associates CC shall grant access to the aforementioned personal information during office hours and within a reasonable time after receiving a written request for access.

## Our Contact Details

Should you have any questions or require any further information, you may contact us at:

### **Information Officer**

Stephen Cloete and Associates CC  
2611 Shangani Drive  
Waterfall Estate  
Midrand  
1685

E-Mail: [stephen@scainsure.co.za](mailto:stephen@scainsure.co.za) or [info@scainsure.co.za](mailto:info@scainsure.co.za)

Tel: +27 (0)10 268 6484

Stephen Cloete and Associates CC (CK2004/0638266/23) is a registered Financial Service Provider (FSP No. 31261)