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- Authorised Financial Services Provider (FSP licence number 13566)

PRIVACY POLICY

Southwood Financial Planning CC

Southwood Financial Planning recognises that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. We will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information. We are required to comply with the principles of the Personal Protection of Information Act (POPIA) as well as those of other applicable laws affecting your personal information.

This Privacy Policy outlines our policy on how we manage your personal information. It also sets out generally what sort of personal information we hold, for what purposes and how we collect, hold, use and disclose that information.

COLLECTING YOUR PERSONAL INFORMATION

We must have a legal basis to process your personal information and we will only process your personal information for the purpose(s) for which it is collected and agreed with you.

In most cases the legal basis for collecting your information will include, but not be limited to, the following:

- Provision of comprehensive financial planning and advice;
- Provision of comprehensive estate planning advice and fiduciary services;
- Fulfillment of our contractual and legal obligations to you;
- To maintain our relationship with you including:
 - management and administration tasks
 - keeping in touch via regular newsletters
 - conducting market research and surveys
 - invitations to Southwood and industry events
- To conduct required verification and reference checks;
- For audit and record keeping requirements;
- As required by any legislation, regulation and/or industry codes;
- As required for legal proceedings.

A list of the applicable legislation in terms of which records are held by us can be found in our PAIA Manual (Promotion of Access to Information Act 2 of 2000).



To enable us to provide you with financial advice that is suitable for your investment objectives, financial situation and particular needs we need to obtain and hold personal information about you. This includes:

- your name, age, gender, date of birth or ID number;
- your contact details including phone numbers, email addresses and residential and postal addresses;
- your employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, risk benefits and retirement fund benefits;
- details of your investment preferences and risk tolerance;
- family circumstances; and
- any other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations. Where possible, we will inform you what information you are required to provide us with and what information is voluntary.

If it is reasonable and practicable we may collect your personal information from a variety of sources, including information we collect directly from you (e.g. when you contact us and we provide services to you), and information we collect from other sources, including commercially available sources, such as public databases (where permitted by law).

Certain personal information is required as a consequence of any contractual relationship we have with you or your employer, to enable us to carry out our contractual obligations to you or your employer.

Generally, your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or with written material. We may need to collect personal information from third parties, such as your accountant/tax practitioner.

We may receive personal information about you when we have taken no active steps to collect that information. We destroy all unsolicited personal information, unless the personal information is relevant to our purposes for collecting personal information.

If information requested by Southwood Financial Planning is not provided, this may result in an application or instruction not being processed or Southwood Financial Planning not being able to provide appropriate advice.

CHILDREN'S PRIVACY

In some instances we may collect personally identifiable information from persons under the age of 18 (children), with the assistance and consent of their legal guardian. If you are a parent or guardian and you are aware that your children have provided us with personal information, without your consent, please contact us. If we become aware that we have collected personal information from children without verification of parental consent, we will take steps to remove that information from our platforms, or to obtain consent.



HOW YOUR PERSONAL INFORMATION IS HELD

We restrict access to personal information to our staff and for business purposes only. We maintain physical, electronic, and procedural safeguards to guard your personal information. We have implemented appropriate technical and organizational measures, such as limiting access to the data to authorised personnel only and storing data on a secure server or cloud-based services, to protect your personally-identifiable information against accidental or intentional manipulation, loss, destruction and access by unauthorised persons. Our security procedures are continually enhanced as new technology becomes available.

Your personal information is generally held in client files or a computer database. Your personal information may also be held in a secure archiving facility.

We may, at our discretion, make recordings and retain such recordings of telephone conversations with you or your authorised representative for purposes set out in this Privacy Policy and may share such recordings with the persons referred to in this Privacy Policy. We will also deal with these recordings in accordance with this Privacy Policy.

We take reasonable steps to ensure that the personal information that we hold is protected from misuse and loss and from unauthorised access, modification and disclosure. Some of the measures that we have adopted are having facilities for the secure storage of personal information, having secure offices and access controls for our computer systems.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which it may be used or disclosed under POPIA.

RETENTION OF RECORDS

Your personal information is only processed and retained for as long as the purpose it was collected for continues, or for as long as required to comply with legal or regulatory requirements or to protect Southwood Financial Planning's legal interests. This may result in your information being retained for longer than any minimum period required by law. In the case that you do not accept a proposed service offering we will retain your records for a minimum of two years in case you contact us or we wish to contact you regarding our service offerings.

USING AND DISCLOSING YOUR PERSONAL INFORMATION

Your personal information may be disclosed for purposes related to the provision of the financial advice you have requested. We rely on third-party service providers to perform a variety of services on our behalf. The types of service providers that may be provided with your personal information are:

- other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice, and paraplanners;
- insurance providers, retirement fund trustees and product providers in connection with the provision to you of the financial advice you have requested;



- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- your representatives or service providers such as your accountant, tax practitioner, legal adviser, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer;
- government authorities and other organisations when required by law; and
- organisations that you have consented to your personal information being disclosed to.

In addition to the purposes of collection set out above, your personal information may also be used in connection with such purposes.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or
- in other circumstances where POPIA authorises the use or disclosure such as when it is required by or authorised under law.

CROSS BORDER TRANSFER OF DATA

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 might process it on our behalf. If this happens, we require our suppliers to apply the same security standards as when we process your information in South Africa.

ACCESSING YOUR PERSONAL INFORMATION

You can gain access to your personal information that we hold. This is subject to exceptions allowed by law such as where providing you with access would have an unreasonable impact upon the privacy of others. If we deny a request for access, we will provide you with the reasons for this decision. To request access please contact us (see “Contacting Us and Privacy Issues” below).

CORRECTING YOUR PERSONAL INFORMATION

We take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information that we hold is not accurate, complete or up-to-date please contact us (see “Contacting Us and Privacy Issues” below) so that we may promptly update our records.



If we do not correct your personal information we will provide you with the reasons for not correcting your personal information. If you request that we associate with the information, a statement claiming that the information is not accurate, complete and up-to-date we will take reasonable steps to comply with this request.

LINKS TO OTHER WEBSITES

When you visit our website, no personal data about you is collected by us.

Our platforms may contain links to and from websites, mobile applications or services of third parties, advertisers or affiliates. Please note that we are not responsible for the privacy practices of such other parties and advise you to read the privacy statements of each website or mobile application you visit which collects information.

CLIENT COMMUNICATION

To keep you informed of important and relevant industry, financial and company information and news we may provide communication to you via electronic communications, which may include email and whatsapp. If you do not wish to receive specific communications that you are subscribed to you may opt-out by following the opt-out procedure in such messages.

Southwood Financial Planning takes reasonable measures to ensure the security of documents sent to you. However, if you choose to receive your personal financial documents (including statements, letters and reports) through the South African Postal Service or through electronic mail, Southwood Financial Planning will not be held liable for any unauthorised access or disclosure of your information once sent.

CONTACTING US AND PRIVACY ISSUES

We may revise this Privacy Policy from time to time and post the new version on our website, which will be applicable upon posting. Please check our website from time to time and make sure that you are aware of the most recent version of this Privacy Policy. You will find the date that the policy was last revised at the top of this Privacy Policy.

BY CONTINUING TO USE OUR SERVICES, PRODUCTS AND/OR PLATFORMS AFTER WE HAVE MADE ANY CHANGES TO THIS PRIVACY POLICY, YOU AGREE TO BE BOUND BY THE CHANGED PRIVACY POLICY.

You can obtain further information on request about the way in which we manage the personal information that we hold or you can raise any privacy issues with us by contacting:

Angela Sayle

Email angelas@southwood.co.za

Phone: +27 21 701 1161

You have the right to lodge a complaint with the Information Regulator, in the prescribed manner or form, if you believe that we are interfering with your personal information. The Information Regulator can be contacted on +27 10 023 5207 or via email infoereg@justice.gov.za