

Wealth Counsel is committed to keeping all personal information collected of those individuals that visit our website and make use of our services accurate, confidential, secure, and private. In this statement we refer to ourselves as 'Wealth Counsel', 'we', 'us' and 'our'.

In accordance with the Protection Information Act (POPIA) and other relevant laws, our privacy statement describes how the Wealth Counsel uses, discloses, retains, and protects your personal information.

POPIA defines personal information as "information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person". This includes, but is not limited to, your name, sex, gender, address, contact details, identity number and medical or health information.

Consent - If you choose to provide us with personal information, you are consenting voluntarily and on an informed basis to Wealth Counsel's processing of your personal information.

For us to offer you financial products and services, we need to collect, use, share and store personal and financial information about you so that we can:

- enter into a client financial and investment planning relationship with you;
- gather information to gain an understanding of your financial needs to facilitate appropriate advice. This would include but not limited to income, expenses, assets and liabilities;
- offer any other related financial and tax services;
- act as an agent for you to implement products and services via authorized third party suppliers;
- communicate with you by phone, SMS, email and other electronic media about products and services that may be of interest to you.

1. Collection of Information

We collect and process personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either:

- *Directly* from you when you complete a product or service application electronically, telephonically or by way of a hard copy;
- *Indirectly* from you when you interact with us electronically by way of our website or social media channels, which may include the collection of metadata (data about data);
- From retirement funds, employers, and other contracted entities in the context of medical schemes and group insurance policies; and
- Where relevant, from third-party sources, such as, financial intermediaries that are associated with the Wealth Counsel, public databases, data aggregators, other financial institutions, credit bureaus, and fraud prevention agencies.
- Where we require personal information and sometimes financial information to service you or comply with the Financial Intelligence Act ("FICA") and other applicable legislation, your failure or refusal to provide us with the necessary information, may limit our ability to provide the required financial products and services to you and the appropriateness of financial advice may be compromised. You are responsible for informing the Wealth Counsel if your information changes.

2. **Collection of information by third parties**

Owners or information system administrators of third-party websites that have links to the Wealth Counsel website may collect personal information about you when you use these links. Wealth Counsel does not control the collection or use of personal information by third parties and this privacy statement does not apply to third parties. Wealth Counsel does not accept any responsibility or liability for third-party policies or your use of a third-party app, platform or service.

3. **Use of Information Collected**

Wealth Counsel will only use your personal information for:

- the purposes for which it was collected and agreed by you
- contact purposes
- confirmation and verification of your identity or to ascertain that you are an authorized user for security purposes
- customer satisfaction surveys or market research for statistical analysis
- audit and retention of record requirements

Wealth Counsel may disclose your personal information, without prior notice to you:

- for the detection and prevention of fraud, crime, money laundering or any other unlawful activity
- where we have a duty or a right in terms of law or industry codes
- maintain, safeguard and/or preserve all the rights and/or property of the Wealth Counsel
- perform under demanding conditions to safeguard the personal safety of clients/users of the Wealth Counsel and/or the general public
- to service providers involved in the delivery of products or services to you

4. **Access, modification and deletion of your information**

You have the right at any time request that we confirm and amend any incorrect or inaccurate personal information which we hold about you. The Wealth Counsel deletes personal information when the Wealth Counsel no longer required for the provision of advice and the legislative requirement to store it ceases.

Where we are obliged by law to retain your information for a prescribed period, a request to delete your information may not be permitted.

5. **Unsubscribe or Opt-Out**

All users and/or visitors to our website have the option to discontinue receiving communication from us and/or reserve the right to discontinue receiving communications by way of email or newsletters. To discontinue or unsubscribe to our website please send an email that you wish to unsubscribe to info@wealthcounsel.co.za. If you wish to unsubscribe or opt-out from any third-party websites, you must go to that specific website to unsubscribe and/or opt-out.

6. **Use of Cookies on our Website**

A "cookie" is a small file that is stored on your computer, smartphone, tablet, or other device when you visit a website or use an app. It contains the address of the website and codes that your browser sends back to the website each time you visit helping to recognise your device (not your individual identity). The file consists of specific information such as login credentials, your preference settings or tracking identifiers.

We limit our use of cookies to:

- provide products and services that you request;
- provide you a better online experience and track website performance; and

- help us make our website more relevant to you.

7. Links to Other Websites

Our website does contain links to affiliate and other websites. Wealth Counsel does not claim nor accept responsibility for any privacy policies, practices and/or procedures of other such websites. Therefore, we encourage all users and visitors to be aware when they leave our website to read the privacy statements of every website that collects personally identifiable information. The Privacy Policy Statement applies only and solely to the information collected by our website.

8. Security

Wealth Counsel will always endeavour to take every precaution in maintaining adequate physical, procedural, and technical security with respect to our offices and information storage facilities to prevent any loss, misuse, unauthorized access, disclosure, or modification of the user's personal information under our control.

9. Data breaches

In the event of a breach being confirmed and your personal information has been compromised, Wealth Counsel will notify you and the relevant Regulatory Authorities of the nature of the breach and what actions may be required as soon as is reasonably possible.

10.Changes to Privacy Statement

Wealth Counsel reserves the right to update and/or change the terms of our privacy statement, and as such we will post those changes to our website homepage at www.wealthcounsel.co.za so that our users and/or visitors are always aware of the type of information we collect, how it will be used, and under what circumstances, we may disclose such information. If at any point in time the Wealth Counsel decides to make use of any personally identifiable information on file, in a manner vastly different from that which was stated when this information was initially collected, the user or users shall be promptly notified by email. Users at that time shall have the option as to permit the use of their information in this separate manner.

Use of our website following the posting of any updates or changes to our terms and conditions shall mean that you agree and accept of such changes.

11.How to Contact Us

Any questions, concerns, or complaints regarding our processing of your personal information must be sent to our Information Officer at compliance@wealthcounsel.co.za. If your complaint is not dealt with to your satisfaction, you may direct it to the Information Regulator:

The Information Regulator (South Africa)

Contacts:

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

General enquiries email : infoereg@justice.gov.za

Tel: 012 406 4818

Fax: 086 500 3351