



## *Centaur Asset Management (Pty) Ltd - Protection of Personal Information (“POPI”) Policy*

Centaur Asset Management is an Authorised Financial Services Provider (FSP No: 647)

### *Preamble*

The Protection of Personal Information Act No 4 of 2013 (“POPIA”) aims to give effect to the constitutional right to privacy by safeguarding personal information and regulates the manner in which personal information must be processed. Centaur Asset Management (Pty) Ltd regards the lawful and correct treatment of personal information as important to the achievement of our objectives and the success of our business. Centaur is committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

This Policy sets out:

- Who we are
- What information we collect
- Our aim to provide ongoing financial services
- How we use your information
- To whom we disclose your information
- How we safeguard your information
- Your rights to access and correction of information
- Changes to this Policy
- How to contact us

### *Who We Are*

In this Policy, Centaur Asset Management (Pty) Ltd, “Centaur” or “we” refers to our company which operates as an authorized Financial Services Provider with license number: FSP No: 647.

### *The Information We Collect*

We collect and process your personal information mainly to provide you with access to our services and products and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that specific purpose. We collect information directly from you where you provide us with your personal details, for example when you invest into a product, enquire about a service from us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional. Examples of the Personal Information we collect includes but is not limited to:

- Clients' identity number, name, surname, address, tax number, marital status and how many dependents they have;
- Source of income and wealth, occupation and employment status
- description of clients' residence, business, assets and liabilities; and
- any other information required by us, and suppliers in order to provide clients with an accurate analysis of their financial planning needs.

We also collect information about you from other sources. With your consent, we may also supplement the information that you provide to us with information we receive from other companies such as administrators, product suppliers or other Financial Services Providers. This is most commonly used for enhanced identity verification purposes as required by the Financial Intelligence Centre Act 38 of 2001.

### *How We Use Your Information*

We will use your personal information only for the purposes for which it was collected or agreed with you, for example:

- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship; to effectively process your transactions;
- to confirm and verify your identity;
- to communicate to you in respect of the product purchase or service applied for
- to detect and prevent fraud;
- to comply with auditing and record-keeping requirements;
- to comply with legal and regulatory requirements;
- to share information with administrators and/or service providers with whom Centaur has a business agreement to process such information on Centaur's behalf or to those who render services to Centaur.

### *Ongoing Financial Services*

Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other financial products and services which may be of particular interest to you.

You may also give and withdraw consent and tell us what your communication preferences are.

### *Disclosure of Information*

We may disclose your personal information to our administrators, service or product suppliers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may also disclose your information where we have a duty or a right to disclose in terms of law or industry codes or where we believe it is necessary to protect your and our own rights.

## *Safeguarding Your Information*

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 ongoing basis, continue to review our security and risk management controls and related processes to ensure that your personal information is secure.

Our risk management (security) policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- 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.

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. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

We would appreciate it if you would keep your personal information accurate.

## *Website Privacy Policy*

### *Personal Information Collected Form Online, Interactive Forms:*

Some of the pages on our website (such newsletter subscription facilities) allow you to voluntarily submit personal information. In all these cases, the information that you submit will only be used for the express purpose for which it was intended and will not be made available to any third party, other than those parties who are employed by Centaur Asset Management (Pty) Ltd or its subsidiaries to perform specific functions on our behalf, such as product marketing, delivery and technical support. Such parties shall however not be entitled to use your information for any purpose other than the function for which they were employed.

### *Personal Information Collected from E-mails That You Send to Us:*

Any e-mail communication that you send to us will normally include your return e-mail address. Chances are that you will also include personal and/or confidential information in your e-mail because you want us to address issues specific to your situation. In any such event, we reserve the right to use that information, including the return e-mail address, in responding to your request.

Please also note that, in very limited circumstances, we may be required by law to disclose information that you submit to us, to certain authorities.

### *Non-personal Information That We May Record:*

During your visit to our website, our operating system may automatically record some general information about your visit. Information recorded by our operating system may include:

- The Internet domain for your Internet Service;
- The type of browser that you are using;
- The type of operating system that you are using;
- The date and time of your visit, as well as the specific pages that you visited;
- The address of the previous website that you were visiting, if you linked to our website from another website.

The information that may be recorded in terms of this paragraph is used for statistical analysis, the ultimate intention of which is to make our website as useful and user-friendly as possible. Please note that the above list may be varied and updated from time to time, but no personal information about any individual visiting our site, will be recorded in this manner.

### *Links to Other Sites:*

This Policy exclusively discloses the privacy practices of our website. We may however provide links to other websites which we believe might be of value to you. Should you follow any of these links, you may be directed to websites which are beyond our control. Even if an affiliation exists between our website and a third-party website, we exercise no control over any linked sites.

Accordingly, our Privacy Policy as stated in this document do not apply to these external links or the websites visited by following these links. If you visit a website that is linked to our site, you should consult that site's privacy policy before providing any personal information.

### *Your Rights: Access to Information*

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us on 021 685 2408 or [admin@centaur.co.za](mailto:admin@centaur.co.za) and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

The details of our Information Officer are as follows:

Information Officer: Roger Williams  
Deputy Information Officer: Megan Morris

### *Correction of Your Information*

You have the right to ask us to update, correct or delete your personal information. You may do this by contacting us on 021 685 2408 or [admin@centaur.co.za](mailto:admin@centaur.co.za) and submit a request in this regard.

We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.

### *Changes to This Policy*

Please note that we may amend this Policy from time to time.

If you have any questions or comments about our Privacy Policy, please forward them to: [admin@centaur.co.za](mailto:admin@centaur.co.za)