

LEGACY FIDUCIARY SERVICES AND ESTATE PLANNERS SA (PTY) LTD (“LEGACY”) AND LEGACY FIDUCIARY SERVICES PRIVATE TRUST (PTY) LTD (“LEGACY PRIVATE TRUST”) PRIVACY POLICY

Who we are

This notice applies to Legacy Fiduciary Services and Estate Planners SA (Pty) Ltd and to Legacy Fiduciary Services Private Trust (Pty) Ltd. This privacy policy describes how Legacy and Legacy Private Trust collects and uses your personal information, with whom we share it and your choices and rights in relation to your personal information.

How we collect your information

We may collect your personal information from you in a variety of ways when you interact with us, including:

- When you access our website, or interact with us in any other way, or use our solutions and services.
- When you communicate with us.
- From third party sources

The type of information we hold

The information we hold may be about yourself (such as name, address and contact details, race, gender, sex, age) and financial information (including details of the accounts and products you hold and related payments and transactions).

Some information may be sensitive information such as health and criminal offences. This information will only be used to provide you with the service you have requested.

Where you provide information about other people (such as joint applicants), you must ensure that you have their consent or are otherwise entitled to provide their information to us.

How do we use your information?

When we ask for information from you, we will tell you how it might be used. For example:

- to assess and process applications
- to inform you about and provide you with our services and solutions
- to verify your identity
- to prevent fraud and money laundering
- to manage your account(s) and communicate with you and to manage our contractual relationship with you
- for audit purposes, research and statistical analysis.

Your rights as a data subject

As a data subject you have the right to have your personal information processed in accordance with the conditions for the lawful processing of personal information as referred to in Chapter 3 of POPIA, including the right:

- to be notified that personal information about you is being collected for or your personal information has been accessed or acquired by an unauthorised person.

- to establish whether a responsible party holds personal information of you and to request access to your personal information
- to request, where necessary, the correction, destruction or deletion of your personal information.
- to object on reasonable grounds relating to your particular situation to the processing of your personal information
- to object to the processing of your personal information at any time for purposes of direct marketing
- not to have your personal information processed for the purposes of direct marketing by means of unsolicited electronic communication except where the data subject has given their consent to the processing or where the data subject is a customer of the responsible party.
- not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of you
- to submit a complaint to the Regulator regarding the alleged interference with the protection of your personal information as a data subject and
- to institute legal proceedings regarding the alleged interference with the protection of your personal information.

Contacting you

We will use your contact details to communicate with you to help you manage your account, to fulfil our regulatory obligations (for example, notify you of changes to terms and conditions), to remind you about the features and benefits of services you already hold and, with your consent, tell you about other services which may be of interest to you. These are called marketing messages and you can change your mind about these communications at any time.

Who we might share your information with?

From time to time, we may share your information with other people or organisations (who are also bound to keep it safe and secure) if we have a duty to disclose it - if it is required for the management of your account/s, or law or regulation allows or requires us to do so, for legitimate business purpose. For example, we may share it with:

- our service providers and agents (in some cases this might include outside the Republic of South Africa)
- credit reference agencies
- fraud prevention agencies and
- regulators and authorities

How can you access your information?

For a small administration fee, you can access the information we hold about you. You can also ask us to change or delete any personal information previously provided. If we can, we will but sometimes we have to maintain records for legal reasons. If you would like a copy of your information, you can write to the Information Officer at the address below.

How long will we keep your information?

We will not retain your personal information for longer than is necessary for the maintenance of your account, or to meet other legal or regulatory requirements.

Security of your personal information:

Legacy is committed to protecting your personal information from accidental or unlawful destruction, damage, loss, alteration, unauthorised access or disclosure by using reasonable, physical, administrative and technical safeguards and contractually requiring that third parties to whom we disclose your personal information do the same.

How do we tell you about future changes to this policy?

Any changes we make to our policy will be put on our website. Please check for updates from time to time, so you are always fully aware of what information is collected and how it is used.

How to contact us?

If you have any questions or concerns about our use of your personal information or would like a copy of the information we hold about you, please write to:

The Information Officer, per email: smukadam@legacyfs.co.za or to the Deputy Information Officer, per email: ibloom@legacyfs.co.za.