



an authorised Financial Services Provider, Licence No. 51102

PROTECTION OF PERSONAL INFORMATION (PoPI) POLICY

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1. DEFINITIONS

Personal Information – means information relating to an identifiable, living natural person or juristic person and includes, amongst others, the following: ID Number, email address, physical address, telephone number, information relating to health, criminal behaviour, views of the person, views about the person and many more.

Data subject – means the person (natural or juristic) to whom the personal information relates. This would normally be the client of the FSP.

Processing – means any operation or activity, whether by automatic means, concerning personal information, and includes the collection, receipt, recording, organization, collation, storage, updating or modification, destruction, etc. of personal information. In short, if a person or organization is in possession of (retains) personal information, they are “processing” personal information. Processing really comes down to any use of personal information.

Record – means any recorded information regardless of form or medium in the possession or under the control of a responsible party, whether it was created by a responsible party and regardless of when it came into existence.

Special Personal Information – includes information concerning a child and personal information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, DNA, sexual life, or criminal behaviour of a data subject.

2. GOAL OF THE PROTECTION OF PERSONAL INFORMATION (PoPI) ACT

The goal of the PoPI Act is to protect data subjects from security breaches, theft, and discrimination. To accomplish this, it outlines eight principles that South African data processors must follow. Each principle encourages responsibility, security, and consent.

2.1 GOAL OF THE PROTECTION OF PERSONAL INFORMATION (PoPI) ACT

- **Accountability** – Vista Wealth’s FIC officer is responsible for compliance with the principles.
- **Processing limitation** - Vista Wealth representatives and key individual will request personal information from clients related to the products and/or services that they utilise. Where information is insufficient, or the quality of the information is unsatisfactory (e.g. ID photo is not legible), staff will advise clients accordingly.
- **Purpose specification** – clients are made aware of the information requirements for each product/service that they utilise. Information requirements are clearly stated on each quote and application form.
- **Further processing limitation** – proof of banking details or copies of bank statements (with bank stamp) is requested for specific investment transactions. The client is also given the option to provide bank statements directly to certain 3rd parties to ensure confidentiality.
- **Information quality** – the representatives and key individual scrutinises the quality of the information prior to submitting to 3rd parties for processing.
- **Openness** – clients are made aware of the information that is required from them and mandatory vs optional data is clearly indicated.
- **Security safeguards** – client information is stored on an access controlled, cloud solution. Quarterly data back-ups are performed to an external device.
- **Data subject participation** – clients can request a copy of their information held by Vista Wealth and clients are provided with the relevant forms to effect changes to their information held by Vista Wealth/3rd parties.

3. DIRECT MARKETING

When initiating direct marketing, Vista Wealth ensures that provision is made for clients to Opt In/Opt Out ensuring that clients understand what they are consenting or objecting to.

4. RETENTION OF RECORDS

In accordance with Section 42(2)(n) of FICA, Vista Wealth keeps record of all FICA due diligence documents and transaction records.

FICA Documents are kept on the database for least 5 years after termination of the business relationship.

Transaction documents are kept for 5 years from transaction date.

Reports submitted to the FIC are kept for 5 years from reporting date.

All documents are stored on Dropbox.

Copies are backed-up quarterly to an external storage device.

5. CLIENT'S CONSENT

Before Vista Wealth assists any client, their written consent is first obtained. Below an example of the wording contained in the consent form the client must sign:

Protection of personal information notice:

We understand that your personal information is important to you and that you may be apprehensive about disclosing it. Your privacy is just as important to us and we are committed to safeguarding and processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our offices at the contact details provided above.

Purpose for processing your information

We collect, hold, use, and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Providing you with advice, products and services that suit your needs as requested
- To verify your identity and to conduct credit reference searches
- To issue, administer and manage your insurance policies
- To process insurance claims and to take recovery action

- To notify you of new products or developments that may be of interest to you
- To confirm, verify and update your details
- To comply with any legal and regulatory requirements

Some of your information that we hold may include, your first and last name, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, occupation, qualifications, past employment, residency status, your investments, assets, liabilities, insurance, income, expenditure, family history, medical information and your banking details.

Disclose and share your information

We may need to share your information to provide advice, reports, analyses, products or services that you have requested.

Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us. Your information may be hosted on servers managed by a third-party service provider, which may be located outside of South Africa.