WellsFaber

WELLSFABER (PTY) LTD PRIVACY STATEMENT AND POLICY

WellsFaber (Pty) Ltd respects your privacy and is committed to keeping your information confidential.

SCOPE

Your privacy is important to WellsFaber (Pty) Ltd ("WellsFaber"). This Privacy Statement and Policy applies to the collection of personal information via products, services, websites, events operated by WellsFaber. In general, you can visit our website www.wellsfaber.com without having to divulge any personal information about yourself. However, while using our website you may provide information about yourself, or it may be collected by us.

You may update personal information at any time by e-mailing us. You may also view your personal information that we hold and correct it, if necessary, on written request to WellsFaber marked for the attention of the Information Officer.

Access to your personal information held by WellsFaber may also be requested by yourself or third parties. The Promotion of Access to Information Act, 2 of 2000 regulates and sets out the procedure for such a request and under what circumstances such access may be refused.

WHAT PERSONAL INFORMATION IS COLLECTED AND HOW IS THAT INFORMATION USED?

Personal information is used as appropriate in the normal course of business to provide the products and services you have requested. We may retain any information for purposes of reporting and administration, to monitor our site or to communicate directly with you.

We collect information about individuals, users, and professionals in variety of ways including but not limited to directly from individuals i.e. when ordering a product, registering an account, using the products, or signing up for a newsletter, employers, publicly available information, and through cookies, and/or similar technology.

We use the information primarily to provide you with a personalized experience that delivers the information, resources, and services that are most relevant and helpful to you.

We do not share with others any of the information you provide, unless we say so in this Privacy Statement, or when we believe in good faith that the law requires it.

HOW IS MY PERSONAL INFORMATION PROTECTED?

We take all reasonable steps to protect your personal information, which is held in a firewalled server. We can however not guarantee the security of any information you transmit to us electronically and you do so at your own risk.

- We maintain administrative, technical, and physical safeguards to protect against loss, misuse or unauthorised access, disclosure, alteration or destruction of the personal information you or your employer provides to us.
- WellsFaber seeks to ensure compliance with Data Protection/Privacy regulations, laws, and industry best practices in respects to security around personal information.

If you are located in another country with data protection/privacy law, we may transfer your personal information to countries that may not guarantee the same level of protection for personal information as the one in which you reside. By giving your information, you consent to these transfers.

WHO HAS ACCESS TO THE PERSONAL INFORMATION?

- We will not sell, rent, or lease mailing lists or other customer data to others, and we will not make your personal information available to any unaffiliated parties, except our approved agents, suppliers and contractors, or as otherwise described in this Privacy Statement.
- We will not disclose any personal information or information about your usage of our products, services, website, or mobile applications to unaffiliated third parties, except as necessary to enhance the product, service, experience, to enforce the terms of use, to meet our obligations to content and technology providers, or as required by law.

HOW MAY YOU CORRECT, AMEND OR DELETE YOUR PERSONAL INFORMATION OR UPDATE YOUR PREFERENCES?

- You may amend update or delete your information at any time via the products or services, via the contact details provided or on our website contact page located at www.wellsfaber.com.
- If you have any additional questions or concerns related to this statement and/or our practices, send us an email to the attention of the Information Officer.

1. PURPOSE

1.1 This policy applies to information relating to identifiable individuals, in terms of the Protection of Personal Information Act, 2013 (hereinafter the POPI Act).

1.2 We are committed to:

1.2.1 Keeping information securely in the right hands; and

1.2.2 Retention of good quality information.

1.3 We further aim to ensure that the legitimate concerns of individuals about the manner in which their data may be used are taken into account. In addition to being open and transparent, we will seek to provide individuals as much choice as is possible and reasonable over what data is held and how it is used.

2. CLIENT INFORMATION

2.1 All personal information from our clients that we obtain, and process is collected mainly to ensure compliance with legislation as well as to provide our clients with the services that we offer, to help us improve our offerings to our clients and to enable us to comply with all statutory requirements in rendering our services. We collect information about individuals, users, and professionals in a variety of ways, including but not limited to directly from the individuals i.e. when ordering a product, registering an account, using a product, or signing up for a newsletter, employers, publicly available information, and through cookies, and/or similar technology. We use the information primarily to provide a personalized experience that delivers the information, resources, and services that are most relevant and helpful to you. We do not share any of the information with third parties, unless we say so in this Privacy Statement, or when we believe in good faith that it is required by law.

2.2 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 the purpose of rendering services to our clients.

2.3 The information required will be collected directly from our clients. Where possible, we will inform our clients what information is required and what information is optional.

2.4 With client consent, we may also supplement the information provided with information received from other companies and organisations, such as the South African Revenue Services (SARS), to enable us to render services to our clients.

2.5 User-supplied Information

When you register for our services - directly or via your Employer - we ask you to provide certain personal information i.e. name, address, phone number, email address, if required payment card information, and/or certain additional categories of information resulting from the use of our products, websites, and services, such as research requests. We keep this information in a contact database for future reference, as needed.

2.6 Marketing

We may use certain information provided by you to offer services we believe may be of interest to you or for market research purposes. If you do not wish to receive such offers and/or marketing information or to be contacted directly, you may opt out (unsubscribe) as described below.

2.7 How may I correct, amend, or delete my personal information and/or update my preferences?

Where some of our products and/or websites make messenger, chat rooms, forums, message boards, or news groups available to you, please remember that any information disclosed in these areas are made so in a public domain. You should exercise caution when disclosing personal information in these areas. Do not disclose information in these public forums that might be considered confidential.

To update your preferences for email communications for our products, services, news updates, bulletins, and reports, please contact us.

2.8 Usage and Web server logs

When you visit our web site, we may track information about your usage and/or visit, and store that information in usage or web server logs, which are records of the activities on our products or sites. Our servers automatically capture and save the information electronically. Some examples of the information we may collect include:

- Your unique Internet protocol address;
- The name of your unique Internet service provider;
- The city, state, and country from which you access our website;
- The kind of browser or computer you use;
- The number of links you click within the site;
- The date and time of your visit;
- The web page from which you arrived at our site;
- The pages you viewed on the site; and
- Certain searches/queries that you conducted via our product(s) and/or website(s).

The information we collect in usage or web server logs, helps us administer the product and site, analyse its usage, protect the product and/or website and its content from inappropriate use, and improve the user's experience.

2.9 Cookies

We use cookies on our website. A cookie is a small piece of data that a website stores on the visitor's computer or mobile device. These data files do not contain personal information, but they do contain a personal identifier that allows us to associate your personal information with a certain device. We do not store any personal information in our cookies that could be read or understood by other web users. Please note that by deleting or disabling cookies, you may not be able to access certain areas or features of our website. We use different types of cookies on our website. These cookies may be deleted from your device at different times, such as at the end of your browsing session or after a pre-set amount of time, or they may persist on your device until you delete them. The different type of cookies we use are:

- Essential cookies: These cookies are required for the operation of our website. Some parts of our website may not work without them.
- Analytical/performance cookies: These cookies allow us to understand how visitors move around our website so that we can improve the way our website works i.e. we use Google Analytics cookies, which report website trends anonymously without identifying individual users.
- Social media cookies: These are cookies that integrate with social media platforms. We use them so that content can be shared from our website to your chosen social media platform. If you would like to delete or disable cookies, please activate the setting on your browser to refuse some or all cookies. Please note, however, that blocking all cookies will block essential cookies and may affect your ability to access some parts of our website. We will make it clear when we collect personal information, and we will explain what we intend to do with it.

By using our products and website you agree that we can place these types of cookies on your device.

3. HOW DOES WELLSFABER PROTECT THE PERSONAL INFORMATION THAT IT COLLECTS?

We have implemented certain appropriate security measures to help protect your personal information from accidental loss and from unauthorized access, use, or disclosure. We store the information in a restricted access server with appropriate monitoring, and we use a variety of technical security measures to secure your data. In addition, we use intrusion detection and virus protection software.

Please note that we may store and process your personal information in systems located outside of your country of residence. However, regardless of where storage and processing may occur, we take appropriate steps to ensure that your information is protected, consistent with the principles set forth under this Statement, and as required under Data Protection/Privacy laws.

4. EMPLOYEE INFORMATION

4.1 All personal information of our employees that we obtain, and process is collected mainly to ensure compliance with legislation and the successful operation of our business.

4.2 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 the purpose of our operations.

4.3 With our employee's consent, we may also supplement the information provided with information received from other companies and organisations, such as the South African Revenue Services (SARS), to enable us to comply with legislation.

5. HOW WE USE OUR CLIENT AND EMPLOYEE INFORMATION

5.1 We will use our clients' and employees' information only for the purposes for which it was collected or agreed to with our clients and employees, for example:

5.1.1 To provide our services to our clients, to carry out the transactions our clients requested and to maintain our relationship;

5.1.2 For audit and record keeping purposes; and

5.1.3 In connection with legal proceedings.

5.2 We will also use our clients and employee's information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.

6. INFORMATION SECURITY

We will not sell, rent, or lease mailing lists or other customer data to third parties, and we will not make your personal information available to any unaffiliated parties, except as follows:

6.1 When data is collected from publicly available domains including but not limited to websites, company directories, company registrars, publicly available government lists, search engines and similar technology.

6.2 To agents and/or contractors who may use it on our behalf or in connection with their relationship with us i.e. we might use third parties to assist with promotional campaigns.

6.3 As required by law, in a matter of public safety or policy, as needed in connection with the transfer of our business assets i.e. if we are acquired by another company or if we are liquidated during bankruptcy proceedings, or if we believe in good faith that sharing the data is necessary to protect our rights or property.

6.4 We will not disclose any information about your usage to unaffiliated third parties, except as necessary to enhance the product experience, service the account, collaboration between WellsFaber, to enforce the terms of use, to meet our obligations to content and technology providers, or as required by law. We may also use statistics regarding usage for product development and enhancement purposes.

6.5 Your access to some of our services and content may be password protected. We recommend that you refrain from disclosing your username(s) and password(s) to anyone, if relevant. We also recommend that you sign out of your product, account, or service at the end of each session. You may also wish to close your product terminal or browser window when you have finished your work, especially if you share a computer with someone else or if you are using a computer in a public place.

6.6 We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We are committed to ensure that all personal information of our clients or their businesses as well as our employees will be kept safe and secure and not be disclosed to any unauthorized third parties.

6.7 No employee of the company shall be allowed to disclose any personal information of our clients or our employees to any unauthorised third party. Any breach in this regard may lead to disciplinary action being taken which may include summary dismissal.

7. ACCESS TO INFORMATION

7.1 Our clients and employees have the right to request a copy of the personal information that we hold about them or their business. Should you wish to obtain any such information, you can lodge such a request with the company. We will take all reasonable steps to confirm your identity before providing details of your personal information.

7.2 Any such access request may be subject to a payment of an allowable administration fee.

8. CORRECT INFORMATION

8.1 Our clients and former employees have the right to ask us to update, correct or delete their personal information. They may do this by contacting us at the numbers/addresses provided.

8.2 We will take all reasonable steps to confirm our client's identity before making changes to personal information we may hold about our client.

8.3 We would appreciate it if our clients and employees would keep their personal information accurate.

9. KEEPING OF RECORDS

9.1 Information and records of a personal nature of our client and our employees shall be stored for a period of 5 years, after the termination of the relationship, before being destroyed.

9.2 Before destroying any information or records, we shall first approach our client or former employee to confirm whether they would like us to hand said information or records to them. Should they not want to keep any such information or records, we will proceed to destroy the information or destroy the information or records ourselves.

10. SECURITY OF PERSONAL DATA

We will take reasonable precautions to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration, and destruction.

11. TRANSFER OF PERSONAL DATA

Subject to this Policy, we may from time-to-time transfer Personal Data within and between various worldwide locations for General Business Purposes, in compliance with country-of-origin regulations and this Policy.

12. ACCOUNTABILITY

12.1 The Company expects its associates, independent contractors, subcontractors, and partners to maintain the trust placed in the Company by those Data Subjects who provide personal information to the Company.

12.2 The Company may periodically audit privacy compliance, and where necessary, will extend by contract its privacy policies and data protection practices to the Company' supplier and partner relationships.

13. ENFORCEMENT

The Company uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the principles. The Company encourages interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Data in accordance with the principles.

14. PRIVACY STATEMENT CHANGES

If WellsFaber information practices change in a significant way, we will post the policy changes here. WellsFaber reserves the right to change this Privacy Statement at any time by posting an updated version here. All previous versions will not be valid.

15. FOR MORE INFORMATION

Information Officer: WLW Theunissen
wrighttheunissen@wellsfaber.com
+27 21 689 4314