

# PRIVACY POLICY



**METTLE CORPORATE FINANCE PROPRIETARY LIMITED**

**2011/102921/07**

**FSP NUMBER 46001**

## 1. What Personal Information does the Company require?

1.1. Mettle Corporate Finance Proprietary Limited (“**the Company**”)’s Personal Information Protection Policy governs the Processing of your Personal Information. You may view the Personal Information Protection Policy by contacting the Information Officer on [wmarais@mettle.net](mailto:wmarais@mettle.net) or on 0027 21 9153370.

1.2. “Personal Information” is defined in the Protection of Personal Information Act (Act no. 4 of 2013) (“**POPIA**”) as follows:

*“Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –*

- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;*
- (b) information relating to the education or the medical, financial, criminal, or the employment history of the person;*
- (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;*
- (d) the biometric information of the person;*
- (e) the personal opinions, views or preferences of the person;*
- (f) correspondence sent by the person, that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;*
- (g) the views or opinions of another individual about the person; and*
- (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.”*

1.3. “Processing” is defined in POPIA as follows:

*“any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—*

- (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;*
- (b) dissemination by means of transmission, distribution or making available in any form; or*
- (c) merging, linking, as well as restriction, degradation, erasure or destruction of information;”*

1.4. The Company is a Responsible Party in respect of the Personal Information you (the “**Data Subject**”) provide to the Company. The Company may process the following types of Personal Information received from you:

- 1.4.1. identification document;
- 1.4.2. proof of residential/business operating address;
- 1.4.3. South African Income Tax registration number;
- 1.4.4. South African VAT registration number (if applicable per individual/legal entity);
- 1.4.5. contact numbers;
- 1.4.6. e-mail addresses;
- 1.4.7. banking details; and
- 1.4.8. details of your investments.

## **2. Why does the Company require your Personal Information?**

2.1. This Personal Information is required in terms of the Financial Intelligence Centre Act, 38 of 2001, the Company’s Risk Management and Compliance Programme. In addition, the Company collects your Personal Information in order to provide the financial services it renders to you in terms of the Financial Advisory and Intermediary Services Act, 37 of 2002.

2.2. The Company needs your Personal Information to provide you with the following services:

- 2.2.1. to establish a legal relationship with you;
- 2.2.2. to generate invoices, statements and capture contact information related to the services provided to you;
- 2.2.3. to compile records of advice with regards to the services rendered to you; and
- 2.2.4. to prepare the legal documentation required to process investments that you wish to enter into following the rendering of the Company’s advice.

### **3. How is your Personal Information Processed?**

- 3.1. Your Personal Information is Processed at 1<sup>st</sup> Floor, Fedgroup Place, Willie Van Schoor Road Tygervalley and 27 Tritonia Street, Welgedacht, Bellville. Storage of your Personal Information takes place in 1<sup>st</sup> Floor, Fedgroup Place, Willie Van Schoor Road Tygervalley and 27 Tritonia Street, Welgedacht, Bellville.
- 3.2. No third-party providers have direct access to your Personal Information unless specifically required by law and to satisfy client due diligence principles.
- 3.3. The Company will at no time during the rendering of its services to you hold money on your behalf. Your Personal Information is therefore not shared by the Company with banking or investment firms other than where we assist you to open an account at such institutions on your behalf and in your name.

### **4. How long does the Company keep your Personal Information?**

Under South African law, the Company is required to keep your Personal Information for a five (5) year period following the date of termination of the business relationship according to the Company's Personal Information Retention Policy. After this period, your Personal Information will be irreversibly destroyed. For more information on the Company's Personal Information retention schedule, please refer to our Personal Information Retention Policy which can be accessed at [wmarais@mettle.net](mailto:wmarais@mettle.net).

### **5. What are your rights?**

- 5.1. Should you believe that any of your Personal Information held by the Company is incorrect or incomplete, you have the right to request to view this information, rectify it or have it deleted. Please contact the Company's Information Officer at [wmarais@mettle.net](mailto:wmarais@mettle.net) should this be required.
- 5.2. In addition, if you wish to complain about how the Company has handled your Personal Information, please contact the Information Officer at [wmarais@mettle.net](mailto:wmarais@mettle.net). The Company's Compliance Department will investigate your complaint and contact you within two (2) business days of the complaint being lodged and work with you to resolve the matter.
- 5.3. If your query relating to your Personal Information is not, in your opinion, adequately dealt with, you can contact the Information Regulator on 012 406 4818 or at [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za) to file an official complaint.