

## THE BRITE ADVISORS SA (PTY) LTD

### Privacy Policy

#### CAPE TOWN

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The Brite Advisors SA (Pty) Limited

Financial Services Provider ("FSP") 51690

Company Reg. Number 2020/527332/07

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#### JOHANNESBURG

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**PRIVACY POLICY**

- A policy is a formal statement of intent that is uniform across the organisation.
- Policies are implemented as high-level building foundations and should reflect the organisation's objectives.
- Policies must be created with the intent to be in place for several years and regularly reviewed with approved changes made as needed.
- Any member of the organisation's governing body may authorise the adoption of this policy by signing the Policy Adoption section.

## STATEMENT

- Any reference to the “organisation” shall be interpreted to include the “policy owner”.
- The organisation’s governing body, its employees, volunteers, contractors, suppliers and any other persons acting on behalf of the organisation are required to familiarise themselves with the policy’s requirements and undertake to comply with the stated processes and procedures.

## RECORD

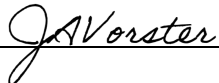
Version	V1
Publishing Date	November 2021
Last Review Date	June 2022
Frequency of Review	Annually
Next Review Date	June 2023
Policy Owner	JA Vorster
Responsible Business Unit	POPIA

## ADOPTION

By signing this document, I confirm that I have read the document and the processes and procedures reflected in it have been implemented into the business model at this date of signature.

Name & Surname: JA Vorster Date: June 2022

Capacity: Executive Member (CEO)

Signature: 


Name & Surname: O Pesev Date: June 2022

Capacity: Executive Member (Key Individual)

Signature: 

Name & Surname: GRD Cooper Date: June 2022

Capacity: Executive Team Invitee (Information Officer)

Signature: 

Name & Surname: TA Barton-Costa Date: June 2022

Capacity: Executive Team Invitee (Senior Investment Advisor)

Signature: 

“We respect your privacy”  
Please read the full privacy policy because it applies to you.

## 1. Introduction

The Privacy Policy defines how Brite Advisory Group Ltd and its subsidiaries, including The Brite Advisors SA, hereafter called “Brite Advisors” and used interchangeably, uses and protects any information you provide when using this website or otherwise. We understand that the privacy of your personal information is of the utmost importance which we consider very seriously. We want to build a valuable relationship which consists of much more than just managing and building your wealth, as your trust is evenly essential.

Our Privacy Policy aligns with our core values:

- Protecting your privacy for the duration of our relationship, or longer if required by specific laws;
- Absolutely no spam, whatsoever;
- Non-disclosure of personal information, unless a law requires us to do so;
- Cookies, to keep you logged in, which the majority of websites use;
- Third Party recording of data is completely anonymous and is only used to ensure that we can improve the Brite Advisors experience and continue to give you the best service.

The Brite Advisors SA (Pty) Ltd, Registration number 2020/527332/07 and FSP 51690, has developed a wide plan of action in order to protecting your privacy. The purpose of this policy is to describe the way that we collect, store, use, process, and protect information that can be associated with you or another specific natural or juristic person which can be used to identify you or that person (**personal information**).

The purpose of this policy is to describe and define the way that we handle your personal information.

## 2. Audience

This policy applies to you if you are:

- a visitor to our website; or
- a client who has appointed us to act as your Financial Services Provider in order to provide you with financial services, which we are licensed for, by the Financial Sector Conduct Authority, (“FSCA”).

This policy applies thus to you under specific circumstances.

## 3. Personal information

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us.

Personal information includes information we collect (i) automatically when you visit our website, (ii) on registration, (iii) on submission, and (iv) received voluntarily from you. It excludes (i) anonymous, (ii) de-identified, and (iii) non-personal statistical.

#### Common examples

Common examples of the types of personal information which we may collect and process include your:

- **identifying information** – such as your name, date of birth, or identification/passport number of any kind;
- **contact information** – such as your phone number/s or email address/es;
- **address information** – such as your physical or postal or work address; or
- **demographic information** – such as your gender or marital status.

#### Sensitive personal information (“SPI”)

In order for us to provide you with the financial services that you require, we may also collect sensitive personal information including your:

- **financial information** – such as your bank account, tax number and other investment details;
- **sensitive demographic information** – such as your race or ethnicity;
- **medical information** – such as information about your physical or mental health;
- **sexual information** – such as information about your sex life or sexual orientation;
- **criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings;
- **employment information** – including your membership of a trade union; and
- **beliefs** – including your political or religious beliefs.

## 4. Acceptance

#### Acceptance required

You must accept all the terms of this policy when you appoint us as your Financial Services Provider, and requesting us to provide you with financial services. If you do not agree with anything in this policy, then you may not appoint us as your Financial Services Provider to provide you with financial services.

You may not appoint us as your Financial Services Provider to provide you with financial services if you do not accept this policy.

#### Legal capacity

You may not access our website or appoint us as your Financial Services Provider if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

#### Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

#### Your obligations

You may only send us your own personal information or the information of another data subject where you have their permission to do so, in which case we will verify the said permission.

## 5. Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website and you can no longer appoint us as your Financial Services Provider. If you continue to use the website or maintain our appointment as your Financial Services Provider following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

## 6. Collection

### On request

When you request further financial services from us, you will be asked to provide us with additional information on a voluntary basis (**services information**).

We collect certain information when you request further financial services from us.

### From browser

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (**usage information**). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

We collect certain information from your web browser, including your Internet usage information when you visit our website.

### Web beacons

Our website may contain electronic image requests (called a **single-pixel gif** or **web beacon** request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

### Links to other web-sites

We can only control the privacy of the information you submit on our website. We do have links to other websites on the brite-advisors.com website but only links that we think might be of interest to you as a user of brite-advisors.com. However, once you visit any external websites, we are no longer in control of any information you decide to disclose to those website providers. As such, you should always consult their privacy policy and always practice due diligence.

We collect certain information from web beacons on our website to compile anonymous information about our website.

### Optional details

You may also provide additional information to us on a voluntary basis (**optional information**). This includes content that you may decide to upload or download from our website or when you enter competitions, take advantage of promotions, respond to surveys, request certain additional services, or otherwise use the optional features and functionality of our website.

We collect certain optional information, that you provide when you upload or download content from our website or when you enter competitions, take advantage of promotions, respond to surveys or register and subscribe for certain additional or services.

### Recording calls

We may monitor and record any telephone calls that you make to our offices.

### Purpose for collection

We may use or process any services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **financial services purposes** – such as requests for or providing you with financial services;
- **marketing purposes** – such as pursuing lawful related marketing activities;
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions, which include storing your information in the G-Suite cloud and transferring your information across borders to our helpdesk, product providers or systems for transactional reasons; and
- **legal purposes** – such as handling claims or complaints, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website;
- monitor website usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

We may use any of your personal information that you provide to us for the purposes that you indicated when you agreed to provide it to us.

### Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any optional information.

We will get your consent to collect your personal information in accordance with applicable law when you provide us with it.

## 7. Use

### Our obligations

We may use your personal information to fulfil our obligations to you.

### Messages and updates

We may send administrative messages and email updates to you about the website or your investments. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages by emailing us at [sa.dpc@brite-advisors.com](mailto:sa.dpc@brite-advisors.com) or [support@brite-advisors.com](mailto:support@brite-advisors.com).

When you supply us with any information, there is always an option box to indicate whether or not you want the information you provide to be used by anybody for direct marketing purposes.

We may use your information to send you administrative messages and email updates to you regarding the website, your investments and for marketing purposes where lawful.

### Targeted content

While you are logged into the website, we may display targeted adverts and other relevant information based on your personal information. In a *completely automated process*, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They **do not** receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We **do not** send personal information to advertisers with the referring URL. *Once you are on the advertiser's website however, the advertiser is able to collect your personal information.*

We may use your information for targeted content in certain, specified instances.

## 8. Disclosure

### Sharing

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their services);
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our product or services providers under contract who help provide certain products or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these products or services providers only use your information in connection with the products or services they supply or services they perform for us and not for their own benefit);
- credit bureaus to report account information, as permitted by law;
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria); and



- other third parties who provide us with relevant services where appropriate.

We may share your personal information with third parties for the purposes of fulfilling our obligations to you among other purposes.

#### Regulators

We may disclose your personal information as required by law or governmental audit.

#### Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

We may disclose personal information to third parties if required for legal reasons.

#### No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

#### Marketing purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

#### Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, representatives or other personnel.

#### Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. *We will disclose the transfer on the website.* If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

## 9. Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfil their job duties and responsibilities. We implement disaster recover procedures where appropriate.

Our website is hosted on a secure server and uses security measures to prevent interference by intruders.

## 10. Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information on the website or otherwise. You are able to review or update any personal information that we hold on you by emailing us at [sa.dpc@brite-advisors.com](mailto:sa.dpc@brite-advisors.com) or [support@brite-advisors.com](mailto:support@brite-advisors.com). Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

If you believe that we are holding incorrect information about you, please use the email address above to write to us at the earliest opportunity, and we will gladly amend any information found to be incorrect.

Please keep your personal information accurate and up to date by emailing us.

## 11. Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law, e.g. FAIS legislation; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records, or both, at our discretion.

We will only retain your personal information for as long as is necessary.

## 12. Transfer to another country

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

We may transfer your personal information outside the country in which it was collected to a foreign country.

## 13. Updating or removing

You may choose to correct or update the personal information you have submitted to us, by contacting us via email at [sa.dpc@brite-advisors.com](mailto:sa.dpc@brite-advisors.com) or [support@brite-advisors.com](mailto:support@brite-advisors.com).

You may choose to update or remove (where appropriate and aligned with other applicable legislation) the personal information you have submitted to us.

## 14. Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

## 15. Enquiries

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us directly at [sa.dpc@brite-advisors.com](mailto:sa.dpc@brite-advisors.com) or [support@brite-advisors.com](mailto:support@brite-advisors.com) in order to address your concerns.