



**FOUR SEASONS
INVESTMENT
MANAGEMENT**

PROTECTION OF PERSONAL INFORMATION POLICY

FOUR SEASONS INVESTMENT MANAGEMENT

2018 / 112051 / 07

FSP NUMBER 49324

Four Seasons Investment Management (Pty) Ltd.
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Director: David Pfaff
An Authorised Financial Services Provider, FSP No.49324

1. INTRODUCTION

- 1.1. Personal information is information that can be related to an identifiable natural person or, to the extent applicable, a juristic person (known as a “data subject”)
- 1.2. Protection of personal information is enshrined in the Constitution of South Africa, and this policy aims to give effect to this right by regulating the way **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** processes personal information.
- 1.3. Processing of personal information refers to any activity concerning personal information including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.
- 1.4. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** is an authorised financial services provider whose business includes (describe briefly). **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** may therefore need to collect personal information from its clients to comply with applicable law and/or to render efficient and effective services.
- 1.5. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD**, as the responsible party, is committed to principles of accountability, transparency and consensual and responsible processing of personal information.
- 1.6. It is the intention of **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** that this policy will protect an individual’s personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.

2. PURPOSE OF PROCESSING PERSONAL INFORMATION

- 2.1. Personal information is processed for the following purpose(s):
 - 2.1.1 To maintain our internal ledger to ensure we comply with FICA, FAIS and the FSCA requirements. Personal information is never shared unless it is a legal requirement to do so.
- 2.2. Any further processing of data must be compatible with the purpose(s) for which the information was collected.
- 2.3. Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, are stored in archives for record-keeping and back-up purposes only.

- 2.4. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** will not, without an individual's consent, share information with any other third parties, for any purposes whatsoever, without written consent by the person to whom the personal information relates.

3. OBTAINING PERSONAL INFORMATION

- 3.1. Personal information is acquired with the consent of the data subject, which consent can be withdrawn at any time by notification to **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD**.
- 3.2. As far as possible, personal information is collected directly from the data subject.
- 3.3. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** is committed to ensuring the accuracy of the personal information collected and uses the following measures to verify:
- 3.3.1 We only accept proof of residence and proof of bank from mainstream corporate institutions. In some instances, we verify the residential addresses by visiting clients at their home address or at their place of work. Often information is shared between professional firms, at the request of the client, such as lawyers and attorneys. This acts as a double check.

4. STORAGE AND SECURITY OF PERSONAL INFORMATION

- 4.1. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** strives to ensure the security, integrity and privacy of personal information submitted. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** will review and update its security measures in accordance with legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** will endeavour to take all reasonable steps to protect the personal information, which an individual submits to **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** or to **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD's** online products and services. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** will always set the highest standards to ensure the integrity of their systems.
- 4.2. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** may engage with other organisations to provide support services to **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD**. Third Parties are obliged to respect the confidentiality of any personal information held by **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD**. A Service Level agreement is in place with all Third parties to ensure adherence to all Privacy Policies.
- 4.3. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD's** employees are obliged to respect the confidentiality of any personal information held by **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD**. All employees are required to sign an employment contract which includes a confidentiality clause.

- 4.4. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** will not reveal any personal information to anyone unless:
- 4.4.1. It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law;
 - 4.4.2. It is in the public interest to prevent financial loss;
 - 4.4.3. The FSP needs to do so to protect their rights.
- 4.5. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date.
- 4.6. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** employed the following security measures to ensure the privacy and integrity of the personal information collected -
- 4.6.1 Information is only accepted by the person it is meant to be for. Original copies are kept in our storage facilities and soft copies are saved on a server that is backed up offsite. We have an IT professional that helps back up data in a secure method to ensure it is safe and protected against any external threats.
- 4.7. If at any time, an individual discovers that information gathered about them is incorrect, they may contact **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** to have the information corrected.
- 4.8. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** will not retain and/or store personal information longer than is necessary given the purpose for which the personal information was collected except for historical, statistical and research purposes and then only with suitable safeguards in place to ensure the privacy and integrity of the personal information.

5. BREACH OF SECURITY

- 5.1. **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** undertakes to ensure reasonable organisation and technical measures are in place to prevent, insofar as possible, any infringements on the privacy and integrity of personal information.
- 5.2. In the event of a breach of security **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** undertakes to notify the Regulator and the data subject in writing as soon as possible of any breach of security.
- 5.3. Notification to the data subject shall be done via mail to the data subject's last known physical or postal address / e-mail to the data subject's last known e-mail address / publication on **FOUR**

SEASONS INVESTMENT MANAGEMENT (PTY) LTD's website / publication in the news or media
(Delete whichever is not applicable) or as directed by the Regulator.

6. TRAINING

As part of its commitment to ensuring organisation wide compliance with this policy, **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD** implements annual training for all staff member of **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD**.

7. INFORMATION OFFICER/CONTACT DETAILS

- 7.1. Any questions relating to **FOUR SEASONS INVESTMENT MANAGEMENT (PTY) LTD's** privacy policy or the treatment of an individual's personal data should be addressed to the Information Officer, whose contact details are:

INFORMATION OFFICER:

Telephone number	:	044 874 5497
Postal address	:	BOX 5255, GEORGE EAST, 6539
Physical address	:	99 MERRIMAN STREET, GEORGE, 6529
Email address	:	david@fsim.co.za
Website	:	www.fsim.co.za