PROTECTION OF PERSONAL INFORMATION POLICY

1. INTRODUCTION

1.1. Ultima Financial Planners (Pty) Ltd. (Ultima) is an authorised financial services provider and is obliged to comply with the Protection of Personal Information Act ("POPI") number 4 of 2013.

1.2. POPI requires Ultima to inform their clients how their Personal Information is collected, stored, transmitted, processed and destroyed.

1.3. Ultima guarantees its commitment to protecting their client's privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.

1.4. This Policy sets out how Ultima processes client's Personal Information and in addition for what purpose the said information is used. This Policy is made available on our company website and by request from our office.

1.5. POPI states that "Personal Information" may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.

2. THE PERSONAL INFORMATION COLLECTED

2.1. Ultima collects and processes the Personal Information of clients pertaining to their financial planning needs and rendering of holistic financial planning services. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever required, Ultima will inform the client what information they are required to provide us with and what information is optional.

The Personal Information, as it relates to either a living natural or juristic person, which we collect includes, but is not limited to:

2.1.1. Information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth;
2.1.2. Information relating to education, medical, financial, criminal or employment history;
2.1.3. Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identfier or other particular assignment;
2.1.4. Biometric information;
2.1.5. The personal opinions, views or preferences of the client;
2.1.6. Correspondence sent by the client that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
2.1.7. The views or opinions of another individual about the client; and
2.1.8. The name of the client if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the client.

2.2. We have agreements in place with all our products suppliers, affiliates, alliance partners, sub-contractors, agents and third-party service providers to ensure there is a mutual understanding with regard to the protection of client Personal Information. They are subject to the same or similar regulations.

2.3. We may also supplement the information provided with information we receive from other providers to offer a more consistent and personalised experience in clients' interaction with us.

2.4. For purposes of this Policy, clients include potential and existing clients.

3. HOW PERSONAL INFORMATION IS USED

3.1. The Personal Information of clients will only be used for the purpose for which it was collected and agreed upon.

The core services which we render can be divided into the following categories:

- Pre-retirement planning;
- Post retirement planning;
- Investment planning;
- Estate planning;
- Business assurance planning; and
- Personal long term risk planning.

This may include the processing of information:

3.1.1. To provide products or services to clients to carry out the transactions requested;
3.1.2. Of a medical nature which could result in underwriting;
3.1.3. To assist the client or insurance company with the assessment and processing of claims;
3.1.4. Conducting credit reference searches or verification of your identity;
3.1.5. Confirming, verifying and updating clients details;
3.1.6. For purposes of claims history;
3.1.7. For the detection and prevention of fraud, crime, money laundering or other malpractice;
3.1.8. Conducting market or customer satisfaction research;
3.1.9. For audit and record keeping purposes;
3.1.10. Providing services to maintain and constantly improve the relationship;
3.1.11. Providing communications in respect of Ultima and regulatory matters that may affect clients;
3.1.12. To comply with legal and regulatory requirements or industry codes which apply to us or when it is otherwise allowed by law;
3.1.13. For the accounting purposes of Ultima;
3.1.14. In order to draft your will and administer your deceased estate;
3.1.16 For couriers and delivery services relating to documents, parcels, gifts, gift vouchers, cards, client events and seminars; and
3.1.15. As it relates to outsourcing to third parties, such as tax services, or estate administration.

3.2. In terms of the provisions of POPI, Personal Information may only be processed if certain conditions are met. The conditions are listed below:

3.2.1. The Client consents to the processing;
3.2.2. The processing is necessary to carry out the actions for the conclusion of the contract or performance to which the client is a party;
3.2.3. Processing complies with an obligation imposed by law;
3.2.4. Processing protects a legitimate interest of the client; or
3.2.5. Processing is necessary for pursuing the legitimate interests of Ultima or of a third party to whom information is supplied.

4. DISCLOSURE OF PERSONAL INFORMATION

Primarily, personal information will be collected directly from the client, unless:

- The information is derived from a public record or has been deliberately made public by the client;
- The client has consented thereto;
- Collection of the information from another source would not prejudice a legitimate interest of the client;
- Collection of the information from another source is necessary in terms of Section 12(2)(d) of the Act.

In other words,

4.1. We may disclose the personal information of clients to our providers whose services or products clients' have elected to use. We have agreements in place to ensure that they comply with confidentiality and privacy conditions.

4.2. We may share the personal information of a client with third parties and obtain information about clients from third parties.

4.3. We may also disclose the personal information of clients where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect our rights.

5. SAFEGUARDING INFORMATION OF CLIENTS

5.1. It is a requirement of POPI to adequately protect the Personal Information which we hold and to avoid unauthorised access to and use of your personal information. We continuously review our security controls and processes to ensure that your personal information is secure.

5.2. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that your personal information is secure.

5.3. Should any of your personal information be transferred outside South Africa for processing or storage, in terms of section 72 of the Act, we will ensure that the recipient is subject to substantially similar conditions for the lawful processing of personal information.

6. ACCESS AND CORRECTION OF PERSONAL INFORMATION

6.1. Clients have the right to access the Personal Information we hold about them, subject to having received adequate proof of identity. They also have the right to request Ultima to update, correct, destroy or delete their Personal Information. Likewise, they have the right to object to the processing of their personal information on reasonable grounds. Once a client objects to the processing of their Personal Information, Ultima may no longer process said Personal Information.

6.2.

6.3. The details of our Information Officer are as follows:

Eugène Antak.

Email: Eugene@ultimafp.co.za

Physical address: c/o Ultima Financial Planners, Glenfield Office Park, Ground Floor Block F, Oberon Street, FAERIE GLEN, 0081 Pretoria.

Postal address: c/o Ultima Financial Planners, P O Box 191 MENLYN, 0063, Pretoria.

Telephone number 012 348 1386.

7. AMENDMENTS TO THIS POLICY

Amendments to this Policy will take place on an ad hoc basis or at least once a year. Clients are advised to check our website periodically to inform themselves of any changes. Where material changes take place clients will be notified directly.

8. ANNEXURES – FORMS

FORM 1: - Objection to the processing of personal information.
FORM 2: – Request for correction/ deletion or destruction of personal information.
FORM 5: – Complaint form

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