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## PRIVACY NOTICE

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This privacy notice applies to personal information processed by Etude Risk Management (Pty) Ltd in connection with products and/or services we offer in accordance with the requirements of the Protection of Personal Information Act (POPIA).

### Privacy Statement

Etude Risk Management is committed to processing personal information following the below principles when collecting, recording, storing, disseminating, and destroying personal information, and responding to government requests for our users' data:

- I. We shall not contact/solicit you unless you have given us your consent to do so.
- II. We shall process information for a specific, lawful reason and only adequate, relevant information which is limited to the purposes for which they are processed and which relates to the functions or the activity of the organisation.
- III. We inform clients upfront that we will be processing data in fulfilment of their request. If you cancel your services with Etude Risk Management, we will delete or otherwise de-identify your personal information after the minimum storage periods required under our risk and statutory record-keeping periods have expired.
- IV. We take measures to ensure data is kept safe and prevent loss of, damage to, or unauthorized destruction of personal information, and unlawful access to or processing of personal information.

### Security

A client has a right to object to the use of personal information, however in certain instances failure to provide us with personal information may result in the inability to deliver said services or products to you, or you shall receive limited services. Etude Risk Management collects information directly from you where you provide us with your details. In addition to the aforementioned we shall, subject to your consent, obtain further information required from third parties and other sources where necessary. Etude Risk Management does not collect and process the special personal information unless it is a requirement by law to process such information as part of our service delivery, in which case we shall obtain consent from you before collection thereof. We do not knowingly collect personal information from children (under 18 years of age) without the permission of their parent/s or guardian.



### **Disclosure**

Etude Risk Management and its employees may disclose personal information: to other services providers involved in the rendering of services or the provision of products to the clients; to services providers, it is in engaged with such as accountants, compliance officers, administration etc.; if Etude Risk Management has a duty or a right to disclose same in terms of law or certain industry codes; or if it is necessary to protect Etude Risk Management's legal rights and interests. We undertake to review and update our security measures in accordance with future legislation and technological advances. Access to client data from within our organisation is limited to essential staff or specialist contractors that are required to access our systems for client service or maintenance purposes, who are bound by the requirements of the legislation and are required to maintain safety and security measures. The organisation will not transfer personal information to a third party in a foreign country without ensuring that it complies with the provisions of POPI.

### **Policy Changes**

This notice was last revised on 26 March 2021. Any material changes hereto will be published on our website or distributed to clients in writing. Your continued use of our services following the update means that you accept Etude Risk Management's updated notice.

### **Questions or Complains**

Should you have any questions relating to this notice or wish to lodge a complaint relating to an interference with the protection of personal information, you can contact the Information Officer. Our Information Officer is **LeRoux van Wyk (Director)** at **leroux@etude.co.za**.