

FINANCIAL REVELATION CC

FSP NUMBER: 51551

DATA PRIVACY POLICY

Document Control

- **Policy draft and review history**

Version	Version 1.0
Status	Adopted and implemented
Publishing Date	June 2024
Last Review Date	N/A
Policy Review Notes	N/A
Frequency of Review	Annually
Next Review Date	1 June 2025
Responsible Persons	Executive Director and Licensed Compliance Officer

- **Policy adoption and approval history**

Date	24 June 2024
Adoption Date – Revised Policy	N/A

1. Introduction

The Protection of Personal Information Act 4 of 2013 (POPIA) requires that a Responsible Party secure the integrity and confidentiality of Personal Information in its possession or under its control by taking appropriate, reasonable technical and organisational measures:

- to prevent loss of, damage to or unauthorised destruction of Personal Information; and
- unlawful access to or processing of Personal Information by the third parties.

Financial Revelation CC (Financial Revelation) is committed to protecting the privacy and security of Personal Information. The Data Privacy Policy (the Policy) outlines how we collect, use, and protect Personal Information in accordance with POPIA.

2. Policy Scope

This Policy applies to all employees, contractors, and third parties who process personal information on behalf of Financial Revelation.

3. Definitions

Data Subject means the person to whom personal information relates.

Person means natural or juristic person.

Personal Information means information relating to an identifiable, living, natural person, and where 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, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- (b) information relating to the education or the medical, financial, criminal or 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;

Processing means 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 other form; or
- (c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

Responsible Party means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information

4. Collection of Personal Information

Personal Information will be collected directly from data subjects whenever possible. The purpose for which personal information is collected will be explained to data subjects at the time of collection.

Financial Revelation will only collect and process the minimum required and necessary Personal Information to render the services to a Data Subject.

5. Use of Personal Information

Personal Information will be used by Financial Revelation only for the purposes for which it was collected, as agreed with the Data Subject. Where necessary, consent will be obtained from the Data Subject for additional processing activities.

6. Storage and Retention of Personal Information

Personal Information will be stored securely to prevent unauthorized access, loss, or damage and will be retained only for as long as necessary to fulfill the purposes for which it was collected, or as required by law.

7. Disclosure of Personal Information

Financial Revelation will not disclose Personal information to third parties without the consent of the Data Subject, unless required by law or for legitimate business purposes. All agreements with third parties will include clauses requiring compliance with the Conditions for Lawful Processing prescribed by POPIA.

8. Data Subject Rights

Data Subjects have the right, free of charge,:

- to access their Personal Information held by Financial Revelation;
- to request the correction or deletion of their Personal Information. Requests will be responded to promptly and in accordance with legal requirements; and
- to be given a description of the Personal Information held by Financial Revelation including where it was obtained if not from the data subject and why it is being held.

Data Subjects must be identifiable and produce a copy of their identity document before submitting any request. Data Subject request must be submitted by email to admin@finrev.co.za.

A Data Subject will be charged a reasonable fee if they want copies of the records containing their Personal Information.

9. Security Measures

Financial Revelation will ensure that appropriate technical and organizational measures are implemented to protect Personal Information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. Regular audits and reviews will be conducted to ensure the effectiveness of security measures.

10. Breach Notification

In the event of a data breach, the affected Data Subjects and the Information Regulator will be notified as required by law. Financial Revelation will implement measures to mitigate the impact of the breach on Data Subjects and prevent future occurrences.

11. Training and Awareness

All employees and contractors will receive regular training on POPIA and data protection practices. Financial Revelation will also conduct regular awareness programs to ensure an understanding of POPIA and compliance with this Policy.

12. Policy Review

This Policy will be reviewed annually or as needed to ensure it remains compliant with POPIA and other relevant legislation. Updates to the policy will be communicated to all employees, contractors, and relevant third parties.

13. Contact Information

For any questions or concerns regarding this Policy or the processing of personal information, contact:

Designated POPIA Information Officer's

Email Address: admin@finrev.co.za

Company website: www.finrev.co.za

14. Information Regulator Contact Details

Should you wish to lodge a complaint with the Information Regulator related to this Privacy Policy, you may do so in the prescribed manner and form. The Information Regulator's office is situated at JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2017. The Information Regulator can also be contacted via email or telephone at:

- General enquiries: enquiries@inforegulator.org.za or
- Popia Compliants: POPIAComplaints@inforegulator.org.za) or
- Telephone number: 010 023 5200.

This Policy has been approved by Financial Revelation's Executive Director and is effective as of 1 July 2024.