

PRIVACY POLICY

1. Introduction and Objective

NREACH CAPITIS PROPRIETARY LIMITED; Reg. No: 2016/316020/07 takes your privacy and the protection of your personal information seriously, and we will only use your personal information in accordance with this Policy and Applicable Laws. This Policy sets out how your personal information will be used by NREACH CAPITIS (Pty) Ltd. and applies to personal and special personal information that you provide to us, or which we may collect from third parties. It is important that you read this Policy carefully before submitting any personal information to us. By submitting any personal information to NREACH CAPITIS (Pty) Ltd. you provide consent to the processing of your personal information and/or that of your Children or any Child that you have legal guardianship over (if applicable) as set out in this Policy. Please do not submit any personal information to NREACH CAPITIS (Pty) Ltd. if you do not agree to any of the provisions of this Policy. If you do not consent to the provisions of this Policy, or parts thereof, NREACH CAPITIS (Pty) Ltd. may not be able to provide its products and/or services to you.

2. Definitions

Applicable Laws	Means all legislation that NREACH CAPITIS (Pty) Ltd. must adhere to and it includes, but is not limited to, the Protection of Personal Information Act No 4 of 2013 ('POPIA'), the Financial Intelligence Centre Act No. 38 of 2001 ('FICA'), the Financial Advisory and Intermediary Services Act No 37 of 2002, the Companies Act No 71 of 2008, and the Promotion of Access to Information Act, No2 of 2000 ('PAIA')
Child or Children	Means a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him- or herself
Processing	Means any activity, concerning personal information, including: i.the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; ii.dissemination by means of transmission, distribution or making available in any other form; or iii.merging, linking, as well as restriction, degradation, erasure or destruction of information.
We, Us or NREACH CAPITIS (Pty) Ltd.	Means NREACH CAPITIS (Pty) Ltd, (registration number 2016/316020/07), a registered financial services provider (FSP No. #)
You or Your	Means any prospective, new, or existing client, supplier, employee, service provider and other stakeholders of NREACH CAPITIS (Pty) Ltd.

3. **Type of Personal Information**

3.1 We may collect the following personal information about you:

3.1.1 your name, addresses, contact details, date of birth, place of birth, identity number, passport number, bank details, gender, information about your Children or any Child that you are legal guardian of, details about your employment, tax number, marital status and details your financial information;

3.1.2 records of correspondence or enquiries from you or anyone acting on your behalf;

3.1.3 details of your transactions;

3.1.4 details of contracts you enter into with us and carry out with us; and

3.1.5 special categories of personal information, that includes race, health and biometric information, such as photo's, fingerprints, and voiceprints.

4. **How we collect Personal Information**

4.1 You may provide personal information to us either directly or indirectly (e.g., through a financial advisor or agent acting on your behalf), by completing an application form for our products and services or when requesting further information about our products and services, whether in writing, through our website, social media platforms, over the telephone or any other means.

4.2 We may also collect your personal information from your appointed agent, any regulator, or other third party that may hold such information.

5. **Use of Information Collected**

5.1 We may use, transfer, and disclose your personal information for the purposes of:

5.1.1 providing you with the services, products, or offerings you have requested, and notifying you about important changes to these services, products, or offerings;

5.1.2 managing your account or our relationship and complying with your instructions or requests;

5.1.3 detecting and preventing fraud and money laundering in the interest of security and crime prevention;

5.1.4 assessing and resolving with complaints;

5.1.5 operational, marketing, auditing, legal and record keeping requirements;

5.1.6 verifying your identity; and

5.1.7 verifying the identifies of beneficial owners of entities.

5.2 We may from time to time contact you about services, products, and offerings available from NREACH CAPITIS (Pty) Ltd. which we believe may be of interest to you, by email, phone, text, or other means, unless you have unsubscribed from receiving such communications.

6. **Disclosure of your Personal Information**

6.1 Your personal information may be shared with financial advisors supporting our products and solutions, shareholders and selected third parties who process the information on our behalf.

6.2 We may also disclose your personal information to third parties in the following circumstances:

6.2.1 to business partners or other third parties to:

i. assess and monitor any of your applications for products or services;

ii. determine which products and services may be of interest to you and/or to send you information about such products and services unless you object or choose not to receive such communications; and:

iii. have a better understanding of your circumstances and needs to provide and improve our products and services to you.

6.2.2 to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime;

6.2.3 to any regulator or supervisory authority, including those in foreign jurisdictions, if NREACH CAPITIS (Pty) Ltd. is required to do so in terms of Applicable Laws;

6.2.4 to any person, if we are under duty to disclose or share your personal information in order to comply with any Applicable Laws, or to protect the rights, property, or safety of NREACH CAPITIS (Pty) Ltd, other clients or other third parties; and

6.2.5 to your financial advisor, his/her assistants and other employees who have a need to know for purposes of providing our services to you, or any other person acting on your behalf.

6.3 We may transfer your information to an agent, sub-contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of the Republic of South Africa. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the same level of protection as if we were dealing with it.

6.4 If you do not wish for us to disclose this information to third parties, please contact us at the contact details set out below. We may, however, not be able to provide products or services to you if such disclosure is necessary but restricted by you.

7. **Retention of your Personal Information**

We will retain your information indefinitely, unless you object, in which case we will only retain it in accordance with retention periods set out in Applicable Laws or for longer if we need to retain it for a lawful purpose (for example, for the purposes of complaints handling, legal processes, and proceedings).

8. **Access to, Correction, and Deletion of your Personal Information**

8.1 You may request details of personal information which we hold about you under PAIA. Fees to obtain a copy or a description of personal information held about you are prescribed in terms of PAIA.

8.2 Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by NREACH CAPITIS (Pty) Ltd., please review our PAIA Manual located at www.nreach.co.za/FAQ

8.3 You have a right to request the correction of personal information that we hold about you.

8.4 Please ensure that the personal information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, NREACH CAPITIS (Pty) Ltd. may limit the products and/or services offered to you or elect not to proceed with the business relationship.

8.5 You have a right in certain circumstances to request the destruction or deletion of personal information and, where applicable, to place a restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details on our website [ADD LINK TO CONTACT DETAILS ON WEBSITE] or below.

8.6 You have a right to object on reasonable grounds, to the processing of your personal information unless Applicable Laws provide for such processing.

9. **Indemnity**

You hereby indemnify and hold NREACH CAPITIS (Pty) Ltd. harmless from any loss, damages, or injury that you may incur as a result of:

1. lawful processing of your personal information; and
2. any unintentional processing of your personal information; and
3. or the provision of incorrect or incomplete personal information to NREACH CAPITIS (Pty) Ltd.

10. **Amendment**

10.1 We may amend this Policy from time to time for any of the following reasons:

10.1.1 to provide for the introduction of new systems, methods of operation, services, products, offerings, or facilities;

10.1.2 to comply with changes to any Applicable Laws or regulatory requirement;

10.1.3 to ensure that our Policy is clearer and more favourable to you.

10.1.4 to rectify any mistake that may be discovered from time to time; and

10.1.5 for any other reason which NREACH CAPITIS (Pty) Ltd, in its sole discretion, may deem reasonable or necessary.

10.2 Any such amendment will come into effect and become part of any agreement you have with NREACH CAPITIS (Pty) Ltd. when notice is given to you of the change by publication on our website www.nreach.co.za
It is your responsibility to check the website frequently.

11. **Complaints**

Should you believe that NREACH CAPITIS (Pty) Ltd. has utilised your personal information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with NREACH CAPITIS (Pty) Ltd. If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

Tel: 012 406 4818

Email: infoereg@justice.gov.za.

Website: <https://www.justice.gov.za/infoereg/>

12. **Contact Us**

If you have any comments or questions about this Policy, please contact our Information Officer at 012-346 6333.