



# Privacy Notice – Protection of Personal Information Act (“POPIA”)

We understand that your personal information is important to you and that you may be apprehensive about disclosing it. Your privacy is just as important to us, and we are committed to safeguarding and processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer.

Our Information Officer’s Contact Details	
Name	Kevin Lourens
Contact Number	+27 82 851 6400
Email Address:	kevin@axiam.co.za

You can request access to the information we hold about you at any time and if you think that we have outdated information, please request us to update or correct it.

**Our details:**

Axiam Capital Management (Pty) Ltd  
2 Burchell Close, Natures Valley, Somerset West, Western Cape, 7130

The Organisation is an authorised financial services provider with FSP nr 189.

**The source of collection of your personal information:**

We collect personal information directly from the following data subjects:

- Prospective clients who enquire about our investment solutions
- Personal information is collected directly from you through the completion of a Mandate. These forms are completed either electronically or in hard copy.

We may also collect information about you from other sources such as external third parties.

**Law authorising or requiring collecting of the personal information:**

As an authorised financial services provider, we are obligated in terms of the following legislation to collect your personal information insofar as it relates to the rendering of the relevant financial services to you:

- Financial Advisory and Intermediaries Services Act 37 of 2002.
- Financial Intelligence Centre Act 38 of 2001.

#### **Purpose for Processing your Information:**

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Complying with the obligations contained in the contract concluded between yourself and the FSP.
- Providing you with advice, products and services that suit your needs as requested.
- To verify your identity
- To issue, administer and manage your investments.
- To confirm, verify and update your details.
- To comply with any legal and regulatory requirements

Some of your information that we hold may include, your first and last name, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, occupation, qualifications, past employment, residency status, your investments, assets, liabilities, income, and your banking details.

Failing to provide compulsory information may lead to our organisation's inability to carry out the functions necessary to perform as an authorised financial services provider.

#### **Third parties and your personal information:**

We may need to share your information to third parties provide advice, reports, analyses, products or services that you have requested. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us.

These third parties may include:

- Your employer (where applicable).
- The Compliance Officer of the organisation (where applicable).
- Information Technology specialists assisting us with data storage, security, processing, analytics, etc.
- Auditors of the Organisation.
- Regulatory or governmental authorities such as the Financial Sector Conduct Authority.

#### **The Transfer of your personal information outside of the Republic of South Africa**

Your information may be hosted on servers managed by a third-party service provider, which may be located outside of South Africa.

We confirm that the level of protection afforded to your personal information by that third country or international organisation is equal to the protection afforded by the POPI Act.

#### **Complaints and objections**

As a data subject, you have the right to –

- Request that we confirm, free of charge, whether or not we hold personal information about you.
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed (please complete Annexure A).
- Request that we consider your objections to the processing of your personal information (please complete Annexure B).
- Lodge a complaint with the Information Regulator (please complete Annexure B).

### **The Information Regulator**

In the event that your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information Regulator.

For further information regarding the complaints process, please visit the website of the Information Regulator, as indicated below.

Alternatively, you may contact the Information Regulator for further assistance:

The Information Regulator: Adv Pansy Tlakula

Physical Address: JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001

Email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

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