

TURLOVFAMILY OFFICE SECURITIES (PTY) LTD

PROTECTION OF PERSONAL INFORMATION POLICY

February 2024

Date of issue/update	Created: January 2024	Version	1
Policy owner	Legal Department		
Approved by	Director	01/02/2024	

1. PERSONAL INFORMATION

Personal information is collected only when an individual knowingly and voluntarily submits information. Personal Information may be required to provide an individual with further services or to answer any requests or enquiries relating to this service.

It is the Financial Services Providers (FSP) intention that this policy will protect an individual's personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.

The FSP collects, stores and uses the personal information provided by an natural / juristic person, to provide financial services.

2. USE OF INFORMATION

The FSP needs to collect personal or other information:

- For underwriting purposes;
- Assessing and processing claims;
- Confirming and verifying an individual's identity;
- For purposes of claims history;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- Conducting market or customer satisfaction research;
- For audit and record keeping purposes;
- In connection with legal proceedings;
- Follow an individual's instructions;
- Inform an individual of services;
- Make sure the FSPs business suits the individual's needs.

Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, is stored in archives for record-keeping and back-up purposes only.

The FSP will not, without an individual's consent, share information with any other third parties, other than where required by law for any purposes whatsoever.

3. SECURITY

The FSP strives to ensure the security, integrity and privacy of personal information submitted. The FSP will review and update its security measures in accordance with future legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, the FSP will endeavour to take all reasonable steps to protect the personal information, which an individual submits to the FSP or to the FSPs online products and services. The FSP will always set the highest standards to ensure the integrity of their systems.

The FSP may engage with other organisations to provide support services to the FSP. Third Parties are obliged to respect the confidentiality of any personal information held by the FSP. A Service Level agreement is in place with all Third parties to ensure adherence to all Privacy Policies.

The FSPs employees are obliged to respect the confidentiality of any personal information held by the FSP. All employees are required to sign an employment contract which includes a confidentiality clause.

The FSP will not reveal any personal information to anyone unless:

- It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law;
- It is in the public interest;
- The FSP needs to do so to protect their rights.

The FSP endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date. If at any time, an individual discovers that information gathered about them is incorrect, they may contact the FSP to have the information corrected.

The FSP recognises the importance of protecting the privacy of information collected about individuals, information that is capable of identifying an individual (personal information).

4. CONTACT INFORMATION

Any questions relating to the FSPs privacy policy or the treatment of an individual's personal data may be addressed to the contact details below:

Information officer: Oleksandr Tsyhlin

Telephone number: +27 67 699 7596

Fax number: n/a

Postal address: SOUTH AFRICA, 121 BEYERS NAUDE DRIVE, ROOSEVELT PARK,
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