Website, Privacy & Cookies Policy

OUR APPROACH

At Credence Investment Group (Pty) Ltd, trust is not a slogan; it is reflected in how we work. We are committed to handling personal information responsibly, transparently and only for legitimate business and legal purposes. Trust starts with clarity - including how your information is handled

This policy explains what information we collect, why we use it, when we may share it, how we protect it, and the choices available to you.

1. Purpose and scope

In this policy, **"process"** means any action we take with personal information, including collecting, recording, using, storing, updating, combining, sharing, making available, securing, deleting or destroying it.

References to **"Credence", "we", "us" or "our"** mean Credence Investment Group (Pty) Ltd and, where relevant, any person or service provider acting on our lawful instructions.

This policy applies when you use our website, engage with us, request advice or information, use our products or services, or communicate with us through any of our service channels. By doing so, you acknowledge that your personal information may be processed as described in this policy, subject to applicable law and any consent that may be required.

> **CLEAR PRINCIPLE**
> We only process personal information where it supports a legitimate service, product, transaction, legal obligation or business purpose. We do not collect information simply because we can.

Where Credence processes personal information on behalf of another party under a contract or mandate, that party's privacy terms may also apply. We may update this policy from time to time to reflect changes in law, regulation, technology or our business practices.

The version published on our website will apply to your interactions with us.

2. What is personal information?

Personal information is information that identifies you or relates specifically to you. It may include, but is not limited to:

- your name, marital status, age, date of birth, nationality, language, education and employment history;
- identity, passport, employee, tax or other identifying numbers;
- contact details, including email address, telephone number, residential address, work address or physical location;
- financial information, including income, assets, liabilities, banking details, payment information, financial history and payments made by or on your behalf;
- information about your family, dependents, beneficiaries, business partners or other people connected to your financial planning;
- biometric information, such as your signature, fingerprints or voice, where relevant;
- health, medical, disability, insurance or underwriting information;
- race, gender, sex, pregnancy, ethnic or social origin, colour, sexual orientation, religion, belief, conscience or culture, where lawfully required;
- criminal history or alleged criminal conduct, where legally relevant;
- your preferences, opinions, personal views and confidential correspondence; and
- views or opinions expressed about you by another person.

Personal information also includes **special personal information**, as explained below.

3. When we may process your information

We process personal information only for lawful purposes connected to our business. This will generally be where:

- you have given consent;
- a person legally authorised by you, a court or the law has given consent;
- the information is needed to enter into or perform a contract with you;
- the law requires or permits the processing; or
- the processing is necessary to protect or pursue your legitimate interests, our legitimate interests or those of a third party.

4. Special personal information

Special personal information includes information about race or ethnic origin, trade union membership, health, biometric information, religious or philosophical beliefs, sex life or sexual orientation, and criminal behaviour or alleged offences.

We may process special personal information only where the law allows it, including where:

- you have expressly consented;
- it is needed for a lawful human resources or payroll requirement;
- it is necessary to establish, exercise, use or protect a right or obligation in law;
- it is needed for statistical or research purposes and the required safeguards are in place;
- you have deliberately made the information public;
- the processing is required by law;
- racial information is required to identify you or meet a lawful reporting requirement; or
- health information is needed to assess insurance risk, underwrite or administer a policy, assess a claim, or enforce an insurance right or obligation.

5. When and where we obtain personal information

We may collect personal information directly from you or from appropriate third parties. This may include information obtained:

- when you complete forms, provide documents, request advice, transact with us or use our website or service channels;
- from your employer, payroll or human resources department where we advise an employer, retirement fund or employee group;
- from financial institutions, insurers, investment platforms, product providers or other systems that are integrated with our processes;
- from your emails, letters, telephone calls, meetings, surveys, support requests or other interactions with us; and
- from your use of our products, services, website or digital channels.

Where required by law, we will obtain your consent before collecting personal information from a third party. Third-party sources may include:

- your spouse, partner, dependants, beneficiaries, employer, business partners or similar sources;
- people you have authorised to share information with us, including a medical practitioner, accountant, attorney or other professional adviser;
- banks, payment processors and service providers involved in carrying out payment or transaction instructions;
- insurers, brokers, financial institutions, investment managers, retirement funds, administrators and product providers involved in advice, underwriting, administration or claims;
- regulators, industry ombuds, law-enforcement bodies, fraud-prevention agencies, government departments and local or international tax authorities;
- trustees, executors, curators or other persons appointed in law;
- attorneys, tracing agents, debt collectors and other parties involved in enforcing agreements;
- our authorised service providers, agents, contractors and technology providers; and
- courts, tribunals or other lawful authorities.

6. Why we process personal information

We may process your personal information for the following purposes:

- to provide financial planning, investment, insurance, retirement, estate-planning and related products or services;
- to understand your needs, circumstances, goals and risk profile and to provide appropriate advice;
- to respond to enquiries, instructions, service requests or complaints;
- to communicate with you and maintain our relationship with you;
- to complete applications, transactions, payments, transfers, claims or other administrative processes;
- to verify your identity and the accuracy of information provided;
- to meet legal, regulatory, compliance, risk-management, anti-money-laundering, sanctions, tax and reporting obligations;
- to assess insurance, investment or other financial risks and determine eligibility for products or services;

- to conduct quality assurance, customer-satisfaction, market, behavioural, statistical or research analysis;
- to develop, test, secure and improve our services, systems and client experience;
- to detect, prevent and investigate fraud, unlawful conduct or security incidents;
- to deliver documents, notices, records or other information to you;
- to administer insurance policies, investments, retirement benefits, claims and related services;
- to provide relevant value-added services or benefits, where applicable; and
- for other lawful purposes reasonably connected to our business and your relationship with us.

7. Marketing and communication preferences

We may use your personal information to communicate with you about financial planning, investments, insurance and related products or services that may be relevant to you. Communication may take place in person, by post, telephone or electronic channels such as email, SMS or other messaging services.

Where the law requires consent - including certain electronic marketing to people who are not clients - we will only communicate after obtaining that consent. You may ask us to stop sending marketing communications at any time. Service, legal or transaction-related communications may still be sent where necessary.

NO PRESSURE, NO FINE PRINT

You remain in control of marketing communication. You may change your preference or opt out at any time, subject to communications that are required to service your affairs or meet a legal obligation.

8. When and with whom we may share information

We do not share personal information casually. We may share it only where one or more of the following applies:

- you have consented;
- sharing is necessary to enter into or perform a contract with you;
- the law requires or permits it;
- it is needed to protect or pursue your legitimate interests, our legitimate interests or those of a third party; or
- it is reasonably necessary for an authorised service provider or product provider to carry out a lawful function on our behalf or in connection with your instructions.

Recipients may include financial institutions, insurers, investment platforms, administrators, retirement funds, professional advisers, regulators, authorities, technology providers, record-storage providers and other authorised service providers. We require appropriate confidentiality and security measures where applicable.

9. Cross-border transfers

Personal information may be transferred to a service provider, product provider or other authorised recipient in another country, particularly where offshore investments, global systems or international services are involved. A transfer will only take place where:

- the information will receive an adequate level of legal or contractual protection;
- the transfer is necessary to enter into or perform a contract with you, or a contract with a third party that is in your interests;
- you have consented to the transfer; or
- it is not reasonably practical to obtain consent, the transfer is in your interests and the law permits it.

  Where possible, the recipient will be required to apply protection that is at least comparable to that required under South African law, unless the law in the recipient country provides stronger protection.

10. Your rights and responsibilities

To protect you, we may require proof of identity before acting on a request. You are responsible for letting us know when your personal information changes or is no longer accurate.

Subject to applicable law and the processes in our Promotion of Access to Information Act, 2000 (PAIA) Manual, you may request:

- confirmation that we hold personal information about you;
- access to, or a copy or description of, the relevant record;
- details of the identity or categories of third parties who have had access to your information;
- correction or deletion of information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, unlawfully obtained or no longer authorised to be retained;
- that we stop or restrict certain processing where you have lawful grounds to object; or
- the withdrawal of consent where processing is based on consent.

We will respond within a reasonable period. A reasonable fee may be charged where the law permits this, and we will advise you before providing copies or detailed records. Legal or contractual limits may apply to access, correction, deletion or objection requests.

Where a change is approved, it may take up to 15 business days to reflect across all systems. We may ask for supporting documents. Information that must be retained by law, contract, regulation or for a lawful purpose may not be deleted.

In some cases, deleting essential information may prevent us from continuing the business relationship or providing a service.

You may lodge a complaint with Credence or with any regulator that has jurisdiction over the protection of your personal information. We will investigate and respond as far as reasonably possible.

11. How we protect your personal information

We take reasonable and appropriate technical and organizational steps to protect personal information. The measures we use are proportionate to the information, the risks involved and accepted industry practice. They may include:

- monitoring and controlling access to systems and information;
- securely storing physical and electronic records;
- controlling access to premises, systems and records;
- using technology and procedures designed to protect confidentiality, integrity and availability;
- carefully selecting and overseeing service providers; and
- securely deleting or destroying records when they are no longer required.

SHARED RESPONSIBILITY

We protect the systems and records under our control. You can help by keeping passwords secure, checking messages carefully, protecting your devices and telling us promptly if you suspect fraud or unauthorised access.

12. How long we keep information

We retain personal information only for as long as reasonably necessary, including where:

- the law, a regulator, a code of conduct or an industry requirement requires us to keep it;
- a contract or mandate requires us to keep it;
- you have consented to its retention;
- it is needed to achieve a purpose described in this policy;
- it is needed for historical, statistical or research purposes; or
- it is required for a lawful business, dispute-resolution, risk-management or record-keeping purpose.

We may retain certain records after our relationship with you has ended where they remain relevant to legal, regulatory, historical, employer, employee, claim or transaction requirements.

13. Our cookie policy

A cookie is a small piece of data sent by a website or application to your computer, mobile device or internet browser, where it is stored.

Cookies may recognise your device, remember that you have visited before, personalise your experience, improve website functionality, support security and fraud prevention, and help us understand how our website is used through analytics.

By using our website or applications, you acknowledge that cookies may be placed on your device, subject to applicable law and any cookie choices made available to you. You can usually manage or block cookies through your browser settings. Blocking certain cookies may affect the way some parts of the website function.

14. Questions, requests and complaints

Questions about this policy, requests relating to your personal information, objections, withdrawals of consent or complaints should be directed to Credence Investment Group (Pty) Ltd using the contact details published on our website or in our PAIA Manual.