

## THE PROTECTION OF PERSONAL INFORMATION ACT CUSTOMER PRIVACY NOTICE

This Notice explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act (“POPIA”).

At GrowthHouse PTY LTD we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

### ABOUT THE COMPANY

GROWTHHOUSE PTY LTD

### THE INFORMATION WE COLLECT

We collect and process your personal information mainly to contact you for the purposes of understanding your requirements, and delivering services accordingly. For this purpose, we will collect contact details including your name and organisation.

We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.

### HOW WE USE YOUR INFORMATION

We will use your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal purposes.

For example:

- To gather contact information
- To confirm and verify your identity
- For audit and record keeping purposes
- In connection with legal proceedings

### DISCLOSURE OF INFORMATION

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

### INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

### **YOUR RIGHTS: ACCESS TO INFORMATION**

You have the right to request a copy of the personal information we hold about you. To do this, simply contact your Financial Adviser or Key Individual directly as provided on our website [www.growthhouse.co.za](http://www.growthhouse.co.za)

We will need a copy of your ID document to confirm your identity before providing details of your personal information.

### **CORRECTION OF YOUR INFORMATION**

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate.

### **DEFINITION OF PERSONAL INFORMATION**

According to the Act “**personal information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act, GROWTHHOUSE PTY LTD also includes the following items as personal information:

- 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, postal address, telephone 10 number, location information, online identifier or other particular assignment to the person;

### **HOW TO CONTACT US**

If you have any queries about this notice; you need further information about our privacy practices; wish to withdraw consent; exercise preferences or access or correct your personal information, please contact your Financial Adviser or Operational Manager:

Name: Melinda Loots  
Office Tel: 010 142 5490  
E-mail address: [melindal@growthhouse.co.za](mailto:melindal@growthhouse.co.za)  
Or visit our website: [www.growthhouse.co.za](http://www.growthhouse.co.za)