



FINANCIAL
PLANNING SERVICES

PRIVACY POLICY

GrowthHouse (Pty) Ltd
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Policy Owner	GrowthHouse PTY LTD
Responsible Person	Abigail Munsami

POLICY ADOPTION

By signing this document, I authorise the organisation's approval and adoption of the processes and procedures outlined herein.

Name & Surname	Garikai Dhombo
Capacity	CEO and Key Individual
Signature	
Date	31/10/2024

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1. INTRODUCTION

At GrowthHouse, your privacy is a priority. We are dedicated to safeguarding your personal information and ensuring it is collected, stored, processed, and used appropriately and in compliance with the law.

2. PURPOSE AND SCOPE OF THIS POLICY

This privacy notice is designed to outline how we handle your personal information in accordance with applicable data protection laws, detailing how we safeguard your privacy within our company. We continually update our systems, processes, and technology to maintain the highest standards of data protection.

As GrowthHouse evolves, we may update this Privacy Policy to reflect those changes. We reserve the right to make amendments periodically, and we encourage you to review this Privacy Policy each time you visit our website for any updates.

3. DEFINITION OF PROCESSING YOUR PERSONAL INFORMATION

To clarify terms used in this Privacy Policy, here's an overview of how "Personal Information" and "Process" are defined under POPIA:

Personal Information: This includes any data related to an identifiable living or juristic person, such as race, gender, marital status, nationality, age, health status, disability, language, education, identity number, contact details, biometric information, and criminal or employment history.

Process: Refers to any action involving Personal Information, whether automated or manual. This includes collecting, receiving, recording, organising, storing, updating, retrieving, altering, using, transmitting, distributing, linking, erasing, or destroying information. "Processing" carries a similar meaning.

4. DATA PROTECTION VALUES

At GrowthHouse, we prioritise the following when handling your personal information:

- Using your information fairly and responsibly
- Being transparent about the data we collect, its uses, and any sharing
- Addressing your questions or concerns about data usage promptly
- Ensuring the security of your information and protecting it from misuse
- Complying with all relevant data protection laws and cooperating with regulatory authorities

5. INFORMATION THAT IS AUTOMATICALLY COLLECTED

When you visit our website, we collect general information about your usage through cookies and similar tools. Cookies are harmless text files stored on your computer's hard drive by web servers when you visit a site. They help websites remember details about your device and usage patterns.

We use cookies to:

- Track frequently visited areas of the GrowthHouse website in order to enhance user experience,
- Temporarily save input in calculators, tools, and other interactive features, and
- Display targeted advertising via third-party tools.

This information is anonymised, meaning it cannot identify individual behaviours or patterns, and we do not use cookies to monitor your internet activity after you leave our site. Additionally, we do not sell or share cookie data.

If you prefer that we do not collect this information, most browsers allow you to disable cookies in the "Privacy and Security" section of their settings.

6. USE OF YOUR PERSONAL INFORMATION AT GROWTHHOUSE

GrowthHouse collects and processes your personal information solely for its intended purposes and as agreed with you.

As an example but not limited to, we may use your information to:

- Provide you with our products and services,
- Maintain our relationship and fulfil our contractual obligations to you,
- Conduct credit checks or verifications with third parties,
- Execute transactions as per your requests,
- Confirm your identity and ensure you are an authorized user for security purposes,
- Detect and prevent fraud, crime, money laundering, or other misconduct,
- Perform market research, customer satisfaction surveys, and statistical analysis,
- Meet audit and record-keeping requirements,
- Engage with third parties to offer services linked to the products you have with us, and
- Support legal proceedings.
- We may also use your personal information to comply with legal, regulatory, or industry requirements. Should you notify GrowthHouse or its subsidiaries that you no longer wish for us to use your information, we will cease processing, subject to any applicable legal obligations.

7. INFORMATION QUALITY AND SECURITY AT GROWTHHOUSE

We implement robust safeguards to prevent unauthorised access and misuse of the personal information we handle. Our security measures are continually reviewed and updated to keep your information secure and ensure its use aligns with this notice.

When sharing personal information with third parties, we take reasonable steps to require these parties to uphold appropriate security practices, ensuring that the information we are responsible for remains secure and is processed lawfully.

In some cases, we may also disclose your information as required by law or when we have a legitimate reason to do so. Limited information sharing within GrowthHouse or its affiliates may be necessary to fulfil agreements, streamline service delivery, and enhance efficiencies, ensuring we meet your needs across our product offerings.

8. CROSS BORDER TRANSFERS

Sharing personal information with third parties may sometimes require transfers to other countries, where data protection laws may differ.

GrowthHouse has established contractual safeguards with such recipients, and before engaging with third parties abroad, we ensure they are subject to laws or binding agreements that offer equal or greater protection for your personal information than outlined in this notice.

9. RECEIVING MARKETING INFORMATION FROM US

We aim to keep you informed about our latest products and services. When purchasing a new product or service, we will ask for your marketing preferences.

If you prefer not to receive marketing updates, you can adjust your preferences using the contact details provided. Please note that even if you opt out, we may still reach out for essential updates, product functionality, or other service-related matters.

10. YOUR RIGHT TO ACCESS YOUR INFORMATION

In certain situations, you have the right to request a copy of the personal information GrowthHouse holds about you. To do so, please reach out to our client services team at info@growthhouse.co.za, your financial adviser, or consult our PAIA manual on our website.

Before providing this information, we will take reasonable steps to verify your identity. Please note that access requests may be subject to a legally permitted fee.

11. CORRECTION OF THE INFORMATION WE HOLD

Under POPIA, you have the right to request updates or corrections to your personal information held by GrowthHouse. You can do this by contacting your financial adviser or a client services consultant. We will confirm your identity before making any changes to your records.

Keeping your personal information current is your responsibility. For updates to details such as your contact information or address, please notify your financial adviser or a client services consultant as soon as possible.

12. RETENTION OF YOUR PERSONAL INFORMATION

You may request the deletion of your personal information, though this right is subject to certain limitations. GrowthHouse retains your personal information only as long as necessary for its intended purpose.

Retention duration may be influenced by the following but not exhaustive:

- Your consent
- Compliance requirements under applicable laws
- Use of information for scientific, historical, or statistical purposes
- The need to establish, exercise, or defend legal claims

13. PRIVACY, COMPLAINTS, COMPLIMENTS OR COMMENTS

Where you have any questions, comments or concerns about how we deal with your personal information, you may request that we:

- do not contact you in future
- provide you with a copy of the personal information which we hold about you
- correct, update, or pseudonymise your personal information in our records
- investigate any alleged misuse of your personal information

14. HOW TO CONTACT US

For any questions related to this policy or any processing of Personal Information in general, you are welcome to contact our appointed Information Officer and Deputy Information Officer.

The contact details of the Information Officer and Deputy Information Officer are as follows:

Information Officer	Garikai Dhombo
Physical Address	The Ridge Building, 8 th Floor, 1 Discovery Place, Sandton, 2196
Telephone Number	010 142 5490
Email Address	info@growthhouse.co.za

Deputy Information Officer	Abigail Munsami
Physical Address	The Ridge Building, 8 th Floor, 1 Discovery Place, Sandton, 2196
Telephone Number	010 142 5490
Email Address	info@growthhouse.co.za

15. INFORMATION REGULATOR

While you may at any time, first approach us with any complaints, you do also have the right to complain to the Information Regulator, whose contact details are:

Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg

Email: info@justice.gov.za

Complaints: POPIAComplaints.IR@justice.gov.za