

**The Wholistics Planning Group (Pty) Ltd**  
FSP No. 6741

**Ethix Advisory Services (Pty) Ltd**  
FSP No. 17206



the  
**wholistics**  
planning  
group  
smart solutions

THE WHOLISTICS PLANNING GROUP

## **PRIVACY POLICY**

July 2021  
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Your sensitive information is safe with us.

Your relationship with us is the most important asset we honour. You have entrusted us with your personal and private financial information. We will do everything to maintain your loyalty and trust.

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### **OUR PRIVACY POLICY**

This notice is being provided to you in accordance with The Protection of Personal Information Act 2011 ("POPI"), in terms of the privacy of personal client information. Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your \*non-public information.

\* Non-public information (NPI), means personally identifiable information and data that an authorised FSP collects about an individual, juristic person or entity, or client or employer groupings and data that is not publicly available; this in providing authorised new or ongoing financial products or services.

## PRIVACY POLICY

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### COLLECTION OF INFORMATION

Personal information is collected in the course of business to provide bespoke financial planning and investment advisement services in terms of our regulated and approved Financial Sector Conduct Authority (FSCA) licenses and in accordance with the Financial Advisory and Intermediary Services Act 37 of 2002 ("FAIS"), Treating Customers Fairly (TCF) and Retail Distribution Review (RDR) principles and procedures.

The type of information stored, will depend on the need for which it is collected and it will only be utilised for that purpose. This information includes but is not be limited to:

- **Personal Details** such as your title, name, address, identity number, passport number, marital status, contact details and email address, banking details and other sensitive materials.
- **Financial Data** and other information (where applicable), about your investments, financial planning needs and analyses, Wills and Trusts, your business financials and reports, and any/all related agreements.
- **Product and Contractual Information** which ensures that products and services remain applicable to you.

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### USAGE OF INFORMATION:

Your private and personal information will only be managed and processed for the purpose for which it was collected and agreed. To process your personal information, the following procedures need to be met:

- You have consented to the processing of your information by the authorised appointment of our Group.
- All our activities and processes fully comply with our obligation set out in the FAIS Act 37 of 2002.

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### SHARING OF INFORMATION:

- We do not sell your personal information to anyone.
- We do not disclose any non-public information about our clients or former clients to anyone except where we believe in good faith that disclosure is required or is permitted by law and in limited instances as described below:
  - We may disclose all of the information we collect, as described above, to certain non-affiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards or are authorised by you to receive any pertinent information.
  - We may disclose your information where we have a duty or a right to disclose the same, in terms of FSP business rules and any legislation; or where it may be necessary to protect your and/or our rights.
  - Outside these exceptions, we will not share your personal information unless you have specifically and lawfully authorised us to do so.
- We enter into contractual agreements with all non-affiliated third parties and providers that ensure they comply with confidentiality and privacy conditions.

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## PRIVACY POLICY

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### PROTECTION OF INFORMATION:

We protect the confidentiality and security of your personal information.

- An Information Officer has been appointed who is responsible for ensuring compliance with the POPI Act.
- We restrict access to personal information to our team and for business purposes only. In addition, we have annual training, internal procedures and protocol in place to ensure ongoing compliance with the POPI Act.
- We maintain physical, electronic and procedural safeguards to guard your personal information. This protocol is re-evaluated from time to time to ensure continued compliance.

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### ACCESS AND UPDATE OF YOUR PERSONAL INFORMATION:

Besides your right to access your personal information, you also have the right to ask us to update, correct or delete.

- We make every effort to keep your personal information accurate and up to date. If you identify any inaccuracy in your personal information, please contact us so that we may promptly update our records.
- Should you object to the processing of your personal information, we may no longer process information for you.

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### LEGAL & COMPLIANCE MANAGER:

<b>Name:</b> Misha Sukdeo	<b>Email Address:</b> mishas@wholistics.co.za
<b>Telephone No.:</b> +27 (0)31 312 4270	<b>Website Address:</b> www.wholistics.co.za
<b>Postal Address:</b> PO Box 51237 Musgrave Road, 4062	<b>Physical Address:</b> The Manor House-West Wing 14 Nuttall Gardens Morningside Durban, 4001

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Any future legal or regulatory amendment to the disclosure of your private, confidential information which is inconsistent with this Privacy Policy, allows The Group to automatically review and update such changes at any time. Such changes will be applied in accordance with all regulatory and compliance practices of our Group.