

Privacy Notice

Last revised: 3 August 2023

1. Introduction

Overberg Wealth and Risk Management (pty) Ltd, Reg. No. 2015/364585/07, and all its subsidiaries (“**We**” / “**Our**” / “**Us**”) respect and protect your right to privacy. Our Privacy Notice (“**Notice**”) applies to everyone (both natural and juristic) whose personal information We collect. This includes Our employees, consumers and customers, vendors, contractors, service providers and other third parties.

This Notice explains how We use, collect, obtain, receive, retain and disclose your personal information via our access control mechanisms, electronic communication facilities and resources, including website, email and social media platforms, in accordance with the requirements of the Protection of Personal Information Act, No. 4 of 2013 (“**POPIA**”).

We receive, provide and process personal information on an ongoing basis.

2. Application

The Notice applies to Us and Data Subject(s) (i.e., the person to whom the personal information relates, including natural and juristic persons) who have access to Our electronic and information technology platforms and facilities.

According to POPIA, “personal information” means information relating to an identifiable, living, natural person and, where applicable, an identifiable, existing juristic person.

By using this Website and/or contacting Us in any way, you agree that We may use your personal information as described in this Notice. Please note this Notice may be supplemented or amended from time to time.

2.1 The personal information we collect

We only collect personal information that is specifically and voluntarily provided. We may also store and maintain any content that you provide. The type of personal information We collect will depend on what We intend to do with the personal information, which will always relate to a function or activity performed by Us.

This Website collects standard internet log information, including your IP address, browser type and language, access times, and referring website addresses. To ensure that this Website is well managed and to facilitate improved navigation, We or Our service providers may also use cookies (small text files stored in a user’s browser) or Web beacons (electronic images that allow this Website to count visitors who have accessed a particular page and to access certain cookies) to collect aggregate data. Additional information on how We use cookies and other tracking technologies and how you can control these can be found in Our [cookie notice](#).

2.2 How We use your personal information

The personal information We collect will be used for the purpose it is collected. However, your personal information may also be used for related legitimate business purposes, including to customise and improve this Website, research purposes and other related services offered to you. In addition, to that, where necessary, personal information will be retained for legal, research and governance purposes.



Focused · Professional · Specialised

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Directors: FGG Joubert, MR van Breda, PJM Cotterell, J Kruger (Alternate), AV Dickason (Managing Director) & AJ Uys (Chairman) • Company Secretary: T Pretorius

Purposes for Us to collect and retain personal information:

- To conclude a contract with you;
- To confirm and verify your identity or the juristic entity you represent or to verify that you are an authorised user of this Website etc.;
- For security purposes;
- For the detection and prevention of fraud, crime, money laundering, terrorism financing, proliferation financing or other malpractice;
- To ensure compliance with mandated legislation requirements;
- For audit and record keeping purposes;
- In connection with legal proceedings;
- To communicate and manage our relationship with you; and
- To manage security and access control to Our email and social media platforms, buildings and facilities.

2.3 Disclosure of personal information

We may disclose your personal information to Our service providers, who deliver products or services to you and Our business. We have agreements in place regarding their compliance with privacy requirements as required by POPIA.

We may also disclose your personal information:

- where We have a duty or a right to disclose it in terms of law, industry codes or regulatory authority; and / or
- where We believe it is necessary to protect Our rights.

By providing information, including personal information, to Us through, *inter alia*, this Website or by direct contact with Us, you consent to the disclosures described above.

2.4 Information Security

We have in place reasonable commercial standards of technology and operational security to protect all personal information you and visitors provide via this Website from unauthorised access, disclosure, use, alteration, or destruction.

We will continuously review Our security controls and related processes to ensure your personal information remains secure.

When We contract with third parties, We impose reasonable and appropriate security, privacy and confidentiality obligations on them to ensure that all Personal Information that We are responsible for is kept secure in accordance with the provisions of POPIA.

Data Subjects will be informed of any breaches in accordance with POPIA.

2.5 Access to, correction or deletion of your personal information

Every person (Data Subject) has the right to access their own personal information held by Us and to ensure that the information is correct, up to date and accurate. Each Data Subject is responsible for keeping their personal information up to date and accurate. Please note, depending on the nature of the personal information, We may not always be able to delete your personal information as requested. In all cases, We will treat requests to access personal information or change to personal information in accordance with applicable legal requirements.

Data Subjects who would like to request access to their information, update their details, or unsubscribe from communications should contact Our Information Officer by using the contact information below. Whereafter the information Officer shall provide the Data Subject with the correct form as contained in the PAIA Manual for the Data Subjects completion.

3. PAIA Manual

The Promotion of Access to Information Act, No 2 of 2000 (PAIA), requires all public and private bodies in South Africa to have a PAIA Manual in accordance with the provisions of section 14 (public bodies) or 51 (private bodies). Essentially, the PAIA Manual explains how people can access the records held by the body.

The Company's PAIA Manual ("Manual") can be found on the Company's Website, or a copy can be requested from the Company's Information Officer. The Manual sets out the process for requesting personal information, any costs that will be charged, what personal information is available, copies of the forms to be completed and much more.

4. Privacy Complaints

If you have any questions regarding this Notice or if you feel We are not dealing with your personal information fairly and lawfully, you may complain to the Information Regulator at:

Address:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001,

P O Box 31533, Braamfontein, Johannesburg, 2017 or

Email: complaints.IR@justice.gov.za

However, please first allow Us an opportunity to resolve any complaint by contacting Our Information Officer at the details below. The Information Officer shall provide you with the necessary form for completion. In the complaint form you must please briefly describe what happened, when it happened and what personal information was affected.

Information Officer: Overberg Wealth and Risk Management (Pty) Ltd

Name: Abri Dickason

Physical Address: 11 Donkin Street, Caledon, 7230

Postal Address: PO Box 50, Caledon, 7230

Tel: (028) 214 3800

Email: info@overbergwrm.co.za

5. Changes to Our Privacy Notice (i.e., this Notice)

We may modify or amend this Notice from time to time at Our discretion. When We make changes to this Notice, We will amend the revision date at the top of this page, and such modified or amended Privacy Notice shall be effective to you and your personal information as of that revision date. We encourage you to periodically review this Notice to be informed about how We are protecting your personal information.

6. Children's privacy protection

We understand the importance of protecting children's privacy in the interactive online world. This Website is not designed for or intentionally targeted at children 18 years of age or younger. It is not Our policy to intentionally collect or maintain personal information about anyone under the age of 18 years.