

POPIA PRIVACY POLICY

How EPW collects, uses, shares, secures and retains personal information

Legal entity	Ekkerd Private Wealth (Pty) Ltd
Registration	2025/593128/07
FSP licence	55438
Contact	office@ekkerdprivatewealth.co.za 044 873 3105

1. Responsible party and Information Officer

Ekkerd Private Wealth (Pty) Ltd is the responsible party for personal information processed in connection with its business. Elena le Roux is EPW's registered Information Officer and may be contacted at manager@ekkerdprivatewealth.co.za or 044 873 3105.

2. Scope

This policy applies to clients, prospective clients, beneficiaries, dependants, representatives, employees, applicants, suppliers, website users and other persons whose personal information EPW processes. It should be read with EPW's PAIA Manual, Cookie Policy and Cyber Fraud Warning.

3. Information EPW may process

- Identity, citizenship, age, marital status, contact and address information.
- Identity numbers, tax numbers, signatures, photographs and verification documents.
- Financial position, income, expenses, assets, liabilities, objectives, risk profile, product holdings, transactions and banking details.
- FICA, tax, regulatory, compliance and source-of-funds information.
- Health or other special personal information where relevant to an insurance or financial-services application and lawfully permitted.
- Family, beneficiary, dependant, employer and representative information supplied for financial planning or administration.
- Communications, instructions, complaints, meeting notes, call records where lawfully recorded, and evidence supporting advice.
- Website, device, cookie, security and usage information described in the Cookie Policy.

4. Sources

Information may be obtained directly from the data subject; an authorised representative; employers, trustees or family members; product suppliers and administrators; identity, sanctions, credit or fraud-prevention services; public records; regulators; and website or communication systems. EPW will seek confirmation where information is obtained indirectly and notification is required.

5. Purposes and lawful grounds

- Verify identity and comply with FICA, FAIS, tax, sanctions and other legal duties.
- Assess needs, provide authorised advice and intermediary services, implement instructions and administer products.
- Perform contracts and take steps requested before entering into contracts.
- Maintain advice, transaction, disclosure, compliance, accounting and complaint records.
- Communicate service information, appointments, regulatory notices and relevant product information.
- Prevent fraud, protect systems, manage risk, defend legal claims and obtain professional advice.
- Meet legitimate business needs that do not unjustifiably override privacy rights.
- Process information with consent where consent is the appropriate legal ground; consent may be withdrawn without affecting earlier lawful processing.

6. Special personal information and children's information

EPW processes special personal information or information about children only when permitted by POPIA, necessary for the relevant service, supported by consent or another lawful authorisation, and protected by suitable safeguards.

7. Sharing and operators

EPW may disclose information only where reasonably necessary to authorised product suppliers and platforms, including Allan Gray and Momentum; insurers, investment administrators, pension funds and service providers; 40Two and other compliance or professional advisers; FICA, identity and fraud-screening services; IT, cloud, backup, communications and cybersecurity providers; auditors; regulators, ombuds, law-enforcement bodies and courts; and persons authorised by the data subject.

Operators processing information for EPW must be subject to appropriate confidentiality and security obligations. EPW does not sell personal information.

8. Cross-border processing

Cloud or service providers may process information outside South Africa. EPW will transfer personal information across borders only where section 72 of POPIA permits it, including where the recipient is subject to adequate protection, a binding agreement, consent or another recognised basis.

9. Security

- Access controls, authentication and least-privilege permissions.
- Security updates, firewalls, endpoint protection and secure backups.
- Identity and banking-detail verification procedures.
- Confidentiality obligations and staff awareness.
- Incident response, investigation and legally required notification.

No system is completely secure. Anyone who suspects unauthorised access or disclosure should contact the Information Officer immediately.

10. Security compromises

Where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, EPW will investigate, contain the incident, preserve evidence and notify the Information Regulator and affected data subjects as soon as reasonably possible, subject to any lawful delay or direction.

11. Retention and destruction

EPW retains records for the period required by financial-services, FICA, tax, employment, company and other applicable law, contractual needs and legitimate dispute-management requirements. Client and advice records may commonly be retained for at least five years and, where justified, longer. Information is securely destroyed or de-identified when it is no longer authorised or required. A single blanket period does not apply to every record category.

12. Direct marketing

Electronic direct marketing will be conducted only where permitted by POPIA. Recipients may object or unsubscribe at any time. Service, regulatory and transactional communications may still be sent where necessary and lawful.

13. Data-subject rights

- Ask whether EPW holds personal information and request access, subject to PAIA and lawful limitations.
- Request correction, updating, deletion or destruction where permitted.
- Object to processing on reasonable grounds where POPIA allows.
- Withdraw consent where processing relies on consent.
- Object to direct marketing.
- Complain to EPW or the Information Regulator.

14. Requests and complaints

Item	Details
EPW Information Officer	Elena le Roux manager@ekkerdprivatewealth.co.za 044 873 3105
EPW general contact	office@ekkerdprivatewealth.co.za
Information Regulator	POPIAComplaints@inforegulator.org.za enquiries@inforegulator.org.za 010 023 5200
Regulator address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

15. Updates

EPW may update this policy to reflect changes in law, technology or operations. Material changes will be published with a revised effective date.