



Bravura

Client Privacy Policy

BRAVURA
CLIENT PRIVACY POLICY

A. TABLE OF CONTENTS

B	Introduction	3
C	Processing Personal Data	3
D	IP Addresses and Cookies	5
E	Disclosure of Personal Data	5
F	International Transfer of Personal Data	5
G	Data Security	6
H	Data Accuracy	6
I	Minimised collection of Data	6
J	Legal Rights	6
K	Contact	7
L	Applicable Law	7

B. PRIVACY POLICY – INTRODUCTION

“Bravura” includes its affiliated entities and subsidiaries. This policy is also relevant to individuals outside Bravura, including visitors to Bravura websites, clients and suppliers with whom Bravura interacts in one way or the other.

This policy governs the manner in which Bravura treats the personal information and/or personal data which it collects or is provided to it.

Bravura respects other’s privacy, personal information and personal data and, for this reason, Bravura takes all reasonable measures in accordance with this privacy policy to protect personal information and personal data and to keep it confidential.

This Policy is expected to be updated from time to time to reflect changes towards processing of personal data or any changes as applicable with regards to the Protection of Personal Information Act 4 of 2013. Bravura encourages concerned users to read its Privacy Policy at regular intervals.

The “responsible party”, as referred to in the Protection of Personal Information Act No. 4 of 2013 (“POPIA”) is Bravura. Queries in regard to the protection of personal information may be directed to the Information Officer at infoofficer@bravura.net.

Reference in this Policy to “Personal Data” means any information that identifies, or could reasonably be used to identify, a living individual, either on its own or together with other information.

C. Processing Personal Data

Collection of Personal Data: Bravura collects Personal Data from different sources, namely:

- When contacted via email or telephone or by any other means of communications;
- As part of Bravura’s client on-boarding procedure;
- When managing transactions for or on behalf of clients; and
- When Bravura’s website is visited.

Generally, data will be provided to Bravura. However, in some cases, Bravura may collect data from a third-party source, such as government or other agencies, a service provider or from public records.

Creation of Personal Data: Bravura creates personal data, such as records of interactions with Bravura, and details of accounts, subject to applicable law.

Relevant Personal Data: Bravura may process the following categories of personal data, such as:

- **Personal Details:** first and last name, middle name, gender, date of birth or age, marital status, ID number, passport number, nationality, photographs;
- **Family Details:** names and contact details of family members;
- **Contact Details:** address, telephone and mobile numbers, email address;
- **Education History:** details of education and qualifications found on public websites;
- **Financial Details:** billing address, bank account numbers, credit card numbers, cardholder or accountholder name and details, instruction records, transaction details; or
- **Electronic Identifying Data:** IP addresses, cookies.

Processing Sensitive Personal Data: Bravura does not seek to collect or otherwise process personal data except when:

- required by law; or
- Bravura has obtained, subject to applicable law, explicit consent prior to processing Personal Data.

Purposes for which Bravura may process Personal Data: Whether Bravura receives Personal Data directly from a person or from a third-party source, Bravura will only process personal data for the purposes listed below, subject to applicable law:

- Providing Services;
- Marketing and/or Prospecting;
- IT and Information Security operations;
- Financial Management ;
- AML and KYC;
- Analytics;
- Client on-boarding;

- Physical Security;
- Legal matters (for e.g. legal compliance and legal proceedings);
- Fraud prevention; or
- For any purpose related to the foregoing or for any purpose for which personal data was provided to Bravura.

D. IP Addresses and Cookies

Bravura may collect information about a computer, including where available its IP address, operating system and browser type, for system administration.

Bravura may obtain information about general internet usage by using a “cookie file” which is stored on the hard drive of a computer. “Cookies” refers to information that is sent from Bravura’s website to a hard drive where it is saved and contains information to personalise a person’s experience on Bravura’s website.

In this way, the next time a Bravura website is used, it will know who the user and that the user has visited the website before. This helps Bravura to improve the site and to deliver a better and more personalised service.

E. Disclosure of Personal Data

Bravura may also need to transfer and disclose personal data to other related companies affiliated to Bravura and/or third parties involved in matters, for legitimate business purposes, in accordance with applicable laws.

Where Bravura transfers or discloses personal data, Bravura will do this in accordance with applicable data protection laws and will take appropriate safeguards to ensure its integrity and protection.

Bravura shall ensure that each related affiliated entity enters into a written agreement subjecting such affiliated entities to equivalent obligations with respect to Personal Data that are imposed on Bravura under this Policy and under the Act.

F. International Transfer of Personal Data

Bravura has international clients and conduct business internationally and Bravura may need to transfer personal data and to other related companies within the group in connection with the purposes set out in this policy.

G. Data Security

Bravura has implemented the appropriate physical, technical and organisational security measures which ensures a level of internal security designed to protect clients' personal data against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of processing of Personal Data, in accordance with the applicable laws.

H. Data Accuracy

Bravura has ensured that reasonable steps have been taken in order to ensure that:

- personal data is processed is accurate and where necessary, kept up to date, and
- any of the personal data that Bravura processes is considered inaccurate, is erased or rectified without further delay.

Bravura may request a person to confirm the accuracy of personal data from time to time.

I. Minimised collection of Data

Bravura takes reasonable steps to limit the collection of personal data to what is directly relevant and necessary to accomplish specific purposes set out in this policy.

J. Legal Rights

According to the applicable law, a person has a number of rights regarding the processing of personal data, including:

- the right to request access to personal data that Bravura processes together with information regarding the nature, processing and disclosure of personal data;
- the right to rectify any inaccuracies in personal data that Bravura processes;
- erasure of personal data that Bravura processes;
- restriction of processing of personal data that Bravura processes;
- the right to have personal data that Bravura processes transferred to another controller; to the extent applicable; and
- where Bravura processes personal data on the basis of consent, the right to withdraw that consent at anytime.

K. Contact

Should there be any questions, requests or concerns regarding this privacy policy, kindly contact or email the Information officer on (011) 459-5000 or infoofficer@bravura.net

L. Applicable law

This privacy policy is governed by the laws of the Republic of South Africa. The user consents to the jurisdiction of the South African Courts for any dispute which may arise out of this privacy policy.