

BRAVURA

CLIENT PRIVACY POLICY

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1. INTRODUCTION

- 1.1 The terms used in this Privacy Policy shall bear the meaning ascribed to such terms in section 1 of the Protection of Personal Information Act 4 of 2013 (**POPIA**).
- 1.2 This Privacy Policy has been prepared in accordance with the POPIA (and the POPIA Regulations) and governs the manner in which Bravura, as a Responsible Party, Processes and makes use of the Personal Information which it collects or is provided to it.
- 1.3 This Privacy Policy is applicable to all Data Subjects whose Personal Information is Processed by Bravura.
- 1.4 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 to keep it confidential.
- 1.5 When dealing with your Personal Information, Bravura will:
 - 1.5.1 Only disclose, collate and Process your Personal Information with your express written permission unless Bravura is otherwise legally required to do so; and
 - 1.5.2 Not disclose, collate and Process your Personal Information for any other purpose, other than that which is disclosed, unless Bravura is provided express written permission to do so, or unless Bravura is permitted or required to do so by law.
- 1.6 This Privacy Policy is expected to be updated from time to time to reflect changes towards Processing of Personal Information or any changes as applicable with regards to the POPIA. Bravura encourages concerned users to read its Privacy Policy at regular intervals.
- 1.7 For purposes of this Privacy Policy:
 - 1.7.1 "**Bravura**" refers to Bravura Capital (Pty) Ltd with registration number 2013/030889/07 and Bravura Solutions (Pty) Ltd with registration number 2014/262223/07, each a private company incorporated in terms of the laws of South Africa and includes their respective affiliated entities and subsidiaries. This Privacy 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; and
 - 1.7.2 "**Website**" means any of Bravura's website/s, including the Bravura website accessible at <https://www.bravura.net> and any social media networks.

1.8 By using the Website, contacting Bravura electronically or providing your Personal Information to Bravura in any other format, you provide Bravura with your express written permission to Process and/or share your Personal Information within the Bravura Group of Companies and with its partners, in the ordinary course of Bravura's business. You may revoke this consent in writing at any time.

2. **PROCESSING PERSONAL INFORMATION**

2.1 **Personal Information**

2.1.1 Personal Information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

2.1.1.1 information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

2.1.1.2 information relating to the education or the medical, financial, criminal or employment history of the person;

2.1.1.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;

2.1.1.4 the biometric information of the person;

2.1.1.5 the personal opinions, views or preferences of the person;

2.1.1.6 correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

2.1.1.7 the views or opinions of another individual about the person; and

2.1.1.8 the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person.

2.2 **Collection of Personal Information**

2.2.1 Bravura collects Personal Information from different sources, namely:

2.2.1.1 When contacted via email or telephone or by any other means of communications;

- 2.2.1.2 As part of Bravura's client on-boarding procedure;
- 2.2.1.3 When managing transactions for or on behalf of clients; and
- 2.2.1.4 When Bravura's website is visited.

2.2.2 Generally, Personal Information will be provided directly to Bravura. However, in some cases, Bravura may collect Personal Information from a third-party source, including (but not limited to) government or other agencies, service provider(s) or from public records.

2.3 **Creation of Personal Information**

2.3.1 Bravura creates Personal Information, such as records of interactions with Bravura, and details of accounts, subject to applicable law.

2.4 **Relevant Personal Information**

2.4.1 Bravura may Process the following categories of Personal Information, such as:

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

2.5 **Processing Special Personal Information**

2.5.1 Bravura does not seek to collect or otherwise Process Special Personal Information except when:

- 2.5.1.1 Required by law; or

2.5.1.2 Bravura has obtained, subject to applicable law, explicit consent prior to Processing Personal Information.

2.6 **Purposes for which Bravura may process Personal Information**

2.6.1 Whether Bravura receives Personal Information directly from a person or from a third-party source, Bravura will only process Personal Information for the purposes listed below, subject to applicable law:

2.6.1.1 Providing services;

2.6.1.2 Marketing and/or prospecting;

2.6.1.3 IT and Information Security Operations;

2.6.1.4 Financial management;

2.6.1.5 Anti-Money Laundering and Know Your Client;

2.6.1.6 Analytics;

2.6.1.7 Client on-boarding;

2.6.1.8 Physical security;

2.6.1.9 Legal matters (for e.g., legal compliance and legal proceedings);

2.6.1.10 Fraud prevention; or

2.6.1.11 For any purpose related to the foregoing or for any purpose for which Personal Information was provided to Bravura.

3. **IP ADDRESSES AND COOKIES**

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

3.2 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.

3.3 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.

3.4 Your acceptance of cookies and other analytical technologies is entirely voluntary. Most web browser software is initially set up to accept the use of such technologies, however, you can reset your web browser software to indicate when they are being used and/or to refuse any such use. You are also able to delete cookies at any time.

4. DISCLOSURE OF PERSONAL INFORMATION

4.1 Your privacy is important to us and we will therefore not sell, rent or provide your Personal Information or Special Personal Information to any unauthorised third parties for their independent use, without your consent, unless required by law. If, at any stage after you have given Bravura your consent, you no longer wish Bravura to use or share your Personal Information or Special Personal Information, you may at any stage withdraw your consent.

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

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

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

5. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

5.1 Bravura has international clients and conducts business internationally. Accordingly, Bravura may need to transfer Personal Information to other related companies within the Bravura group in connection with the purposes set out in this Privacy Policy.

5.2 Should Bravura be required to transfer any Personal Information to such locations outside of the Republic of South Africa, and to Process the Personal Information in such locations, we will ensure that the third party who will be the recipient of the Personal Information will be subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection that effectively upholds principles for reasonable Processing of the Personal Information that are substantially similar to the conditions for the lawful Processing of the Personal Information as prescribed by the POPIA.

6. 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 Information against accidental or unlawful destruction, accidental loss, alteration,

unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing of Personal Information, in accordance with the applicable laws.

7. DATA ACCURACY

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

7.1.1 Personal Information is Processed is accurate and where necessary, kept up to date, and

7.1.2 any of the Personal Information that Bravura Processes is considered inaccurate, is erased or rectified without further delay.

7.2 Bravura is not responsible for the accuracy, completeness, or currency of your Personal Information. In this regard:

7.2.1 You may from time to time be requested to confirm that the Personal Information Bravura has about you is up to date and correct; and

7.2.2 You must report any changes to your Personal Information to Bravura in order for Bravura to keep the data accurate.

7.3 Please notify us of any updates or corrections to your Personal Information held by Bravura by contacting us at infoofficer@bravura.net .

8. MINIMISED COLLECTION OF DATA

Bravura takes reasonable steps to limit the collection of Personal Information to what is directly relevant and necessary to accomplish specific purposes set out in this Privacy Policy.

9. LEGAL RIGHTS

9.1 According to the applicable law, a person has a number of rights regarding the Processing of Personal Information, including the right at any time to:

9.1.1 establish whether Bravura holds your Personal Information and to request access to your Personal Information;

9.1.2 object to what you believe to be the unlawful Processing of your Personal Information;

9.1.3 object to the Processing of your Personal Information on reasonable grounds relating to your particular situation, unless processing is required by law;

- 9.1.4 object to the Processing of your Personal Information for purposes of direct marketing;
- 9.1.5 withdraw your consent to the Processing of your information in terms of this Privacy Policy and request us to cease such Processing and delete all records of your Personal Information. You can do so by contacting Bravura at infoofficer@bravura.net;
- 9.1.6 request Bravura to correct, destroy or delete any of your Personal Information that may be in our possession or under our control where such information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained. In this regard, please take note that any such deletion may impact on your ability to utilise the full functionality of the Websites and any of our services and products;
- 9.1.7 not be subject, under certain circumstances, to a decision which is based solely on the basis of the automated Processing of your Personal Information intended to provide a profile of you;
- 9.1.8 institute civil proceedings regarding the alleged interference with the protection of your Personal Information; and
- 9.1.9 submit a complaint to the Information Regulator regarding an alleged interference with the protection of your Personal Information in accordance with this Privacy Policy.

10. RETENTION

- 10.1 Bravura will retain your Personal Information only for as long as is necessary in order to fulfil the purpose for which it was collected or Processed. In general, and unless otherwise determined, we do not consider it necessary to retain your Personal Information for a period longer than is necessary for achieving the purpose for which the information was collected.
- 10.2 Bravura may retain Personal Information beyond the time period contemplated in clause 10.1 where:
 - 10.2.1 there is explicit consent given for the further retention of such information;
 - 10.2.2 Bravura reasonably requires such information to be retained for lawful purposes related to Bravura's business functions or activities;
 - 10.2.3 such information is necessary to be retained for historical, statistical or research purposes;

- 10.2.4 Bravura is required by law to retain such information;
 - 10.2.5 Bravura is required to retain such information for evidentiary purposes; or
 - 10.2.6 Bravura is required to retain such information by virtue of a contract entered into between us.
- 10.3 Any information retained pursuant to clause 10.2 shall be retained only for so long as is required to fulfil the purpose for which it was retained for any additional period.
- 10.4 Upon Bravura no longer being able to retain it, Bravura will, as soon as reasonably practicable, delete, destroy, or de-identify all of your Personal Information held by us.

11. **CONSEQUENCES OF FAILURE TO PROVIDE YOUR PERSONAL INFORMATION**

- 11.1 Providing your Personal Information to Bravura is usually voluntary. However, it may be mandatory for you to provide your Personal Information in certain circumstances.
- 11.2 Should the Personal Information not be provided, and should you fail to furnish your consent to the Processing of the Personal Information, Bravura will be unable to provide the products or services to you or comply with our legal obligations.

12. **COMPLAINTS AND ENQUIRIES**

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.

13. **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 or in connection with the formation, interpretation, substance or application of this Privacy Policy.