



PERSONAL INFORMATION PROTECTION POLICY

PROTECTION OF PERSONAL INFORMATION ACT

OAKHAVEN CAPITAL (PTY) LTD

1. INTRODUCTION

- 1.1. Oakhaven Capital (Pty) Ltd (“the FSP”) is an authorised financial services provider in terms of the Financial Advisory and Intermediary Service Act (FAIS) and is regulated by the Financial Sector Conduct Authority (FSCA).
- 1.2. The Protection of Personal Information Act (“POPI”) gives effect to the constitutional right of protection of personal information and this policy aims to give effect to this right by regulating the way personal information is processed by the FSP.
- 1.3. Processing of personal information refers to any activity concerning personal information including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.
- 1.4. The FSP is required to process personal information of natural persons or juristic persons (“data subjects”) which includes the personal information of clients, service providers and staff.
- 1.5. The FSP is committed to principles of accountability, transparency and responsible processing of personal information.

2. PURPOSE OF PROCESSING PERSONAL INFORMATION

- 2.1. Personal information is processed by the FSP for purpose(s) including, but not limited to, the following:
 - 2.1.1. To establish a legal business relationship with clients through various on-boarding processes and to render and maintain efficient and effective discretionary financial services to clients.
 - 2.1.2. To conduct client due diligence and client verification in terms of the FSPs Risk Management and Compliance Programme (FICA);
 - 2.1.3. To establish and maintain employment relationships; and
 - 2.1.4. To establish and maintain legal business relationships with service providers.

2.2. The FSP will ensure that the processing of personal information is compatible with the purpose for which the information is required and only processed for the purpose for which it was intended.

2.3. The FSP will not, without obtaining written consent, share personal information with any other third parties, for any purposes whatsoever, unless a law of general application dictates that the information be shared with the third party.

3. OBTAINING PERSONAL INFORMATION

3.1. Personal information must be acquired with the consent of the data subject, which consent can be withdrawn at any time by written notification to the duly appointed information officer of the FSP.

3.2. As far as possible, personal information is collected directly from the data subject by the duly appointed management company appointed by the FSP or the FSP collects the personal information directly from the data subject.

4. STORAGE AND SECURITY OF PERSONAL INFORMATION

4.1. The FSP strives to ensure the security, integrity and privacy of personal information which it processes and will review and update its security measures in accordance with legislation and technological advances.

4.2. The FSP may engage with other organisations to provide support services to store and secure personal information.

4.3. A Service Level agreement is in place with all Third parties to ensure adherence to all Privacy Policies.

4.4. Employees are obliged to respect the confidentiality of any personal information held by the FSP.

5. DATA OR SECURITY BREACHES

5.1. The FSP undertakes to ensure all reasonable organisation and technical measures are in place to prevent, insofar as possible, any infringements on the privacy and integrity of personal information which it processes.

- 5.2. In the event of a data or security breach, the FSP must notify the Information Regulator in the prescribed form and manner and the data subject in writing as soon as possible.
- 5.3. Notification to the data subject shall be done via email to the last known e-mail address, by publication on the FSPs website or by publication in the news or media.

6.)INFORMATION OFFICER

- 6.1. The Information Officer duly appointed by the FSP and the relevant contact details include:

Information Officer: Bruce Thistlewhite

Physical address: Suite 15, 114 Oxford Road, Houghton Estate, 2198

Telephone Number: 011 447 1360

Email: bruce@oakhavencap.co.za

Website: www.oakhavencap.co.za
