Opes Wealth

Privacy Policy

November 2025

INTRODUCTION

The purpose of this policy is to outline the Privacy Policy of **Opes Wealth** and all staff, hereafter "Opes Wealth." The FAIS Act provides for the protection of personal information of Clients; and The Protection of Personal Information Act, 2013 ("POPIA") provides for 8 Data Protection Information principles to comply with to ensure the protection of all data that relates to companies, staff and clients. The Promotion of Access to Information Act, 2 of 2000 (PAIA) provides for access to such information and in which instances it may be refused.

PURPOSE

Data privacy and data protection is important to the company and this policy sets out the POPIA principles in line with existing FAIS requirements to ensure the safekeeping of all Data by the company and Persons/Employees/Parties (as applicable). This policy applies to all Data obtained via products, services, websites, events operated by the company or by any other means.

DEFINITIONS

- **Information:** means any Data relating to the Data Subject and includes reference to personal information.
- **Data Subject:** means the person to whom the personal information relates and can include Clients, staff and/or Company information.
- **Processing:** Any use by any means of a Data Subject's Information.

THE 8 POPIA PRINCIPLES

Principle 1: Accountability: The company must appoint an Information Officer who will be responsible for ensuring that the 8 POPIA information principles are implemented and enforced in the company.
Principle 2: Processing Limitation: Only necessary Information should be collected, directly from the person to whom the Personal Information relates and with their consent and the processing should be for a lawful purpose.
Principle 3: Purpose Specification: Personal Information should be collected for a specific purpose and the Data Subject must be made aware of the purpose for which it was collected.
Principle 4: Further Processing Limitation: Further processing of Personal Information must be compatible with the purpose for which the information was collected (Principle 3).
Principle 5: Information Quality: Reasonable steps must be taken to ensure that all Information collected is accurate, complete, not misleading and up to date in accordance with the purpose for which it was collected (Principle 3).
Principle 6: Openness: The Party collecting the Information must be transparent and inform the applicable regulator if it is going to process the Information and ensure that the Data Subject has been made aware that his/her Information is going to be collected.
Principle 7: Security Safeguards: The integrity of the Information under the control of a party must be secured through technical and operational measures.
Principle 8: Data Subject Participation: Data Subjects have the right (free of charge) to request confirmation from the party that holds their Information on the details they hold and may request for it to be amended/deleted.

PRACTICAL IMPLICATIONS OF THE POPIA DATA PROTECTION PRINCIPLES

Appointment of the Information Officer:
Opes Wealth has appointed an Information Officer who is a senior person in the company, responsible for ensuring that Opes Wealth staff have been properly informed and trained on ensuring the safekeeping and protection of Information in the company and that the required processes are implemented to ensure compliance.

The Information Officer can be contacted at
Tel: +27 82 378 2123
Email: darren@opeswealth.co.za

Information Purpose:

The type of Information **Opes Wealth** collects will depend on the purpose for which the Data is collected and used.
Opes Wealth will collect the necessary Information from Data Subjects for various purposes, including the following:

- rendering suitable services for e.g. financial services (including the rendering of advice and intermediary services) and administrative services to Data Subjects;
- improving services and product offerings to Data Subjects;
- providing information and resources most relevant and helpful to Data Subjects;
- appointing suitable individuals/companies to provide financial services/products to Data Subjects;
- ensuring compliance with legislation that requires specific information to be collected.

Access to Information:

- Data Subjects have the right to request a copy of the Information that **Opes Wealth** holds on them or their business. Should a Data Subject wish to obtain any such information, the Data Subject may request it by contacting the Information Officer on the details provided above. Any such access request may be subject to the payment of an allowable administration fee.
- **Opes Wealth** will not disclose or share Information relating to any Data Subject unless: it is specifically agreed with the Data Subject; it is already publicly available or in the interests of the public; required in terms of Law; or if **Opes Wealth** believes in good faith that the Law requires disclosure thereof.
- **Opes Wealth's PAIA Manual** (in terms of the Promotion of Access to Information Act, 2 of 2000) sets out the process for access by third parties to a Data Subject's Information kept and the instances in which it may be refused.

Collection of Information:

- **General: Opes Wealth** collects Information in various ways e.g. directly from individuals (for example, when purchasing a financial product, registering an account, using a product, or signing up for a newsletter), from employers, publicly available information, through cookies, and/or similar technology. **Opes Wealth** will only gather Personal Information for a specific, explicit and lawful purpose only as set out in **Opes Wealth's POPI Policy**. With the Data Subject's consent, we may supplement the information with other information received from other companies and/or organisations such as the South African Revenue Services (SARS) in order to enable us to render suitable and proper services to Data Subjects.
- **User Supplied Information:** The Data Subject may be required to provide some personal information, for example, his/her name, address, phone number, email address, bank details (if applicable), and/or certain additional categories of information as a result of using/receiving financial services, purchasing financial products, and using websites and related services. **Opes Wealth** will keep this information in a contact database for future reference, as needed.
- **Marketing: Opes Wealth** may use certain Information provided by Data Subjects to offer them further services that we believe may be of interest to them or for market research purposes. These services are subject to prior consent being obtained from Data Subjects. If a Data Subject no longer wishes to receive further services or offers from us, it may unsubscribe from the services or contact the Information Officer at the contact details provided above.
- **Usage and Web Server Logs: Opes Wealth** may track information about a Data Subject's usage and visits on our website. This Information may be stored in usage or web server logs, which are records of the activities on our services, products and/or sites.

Some examples of the Information that may be collected include the Data Subject's:

- Unique Internet protocol address
- Name of the Data Subject's Internet Service Provider

- The city, state and country from which a Data Subject accesses our website
- The kind of browser or computer used
- The number of links clicked within the site
- The date and time of visits to the site
- The web page from which the Data Subject arrived on our site
- The pages viewed on the site
- Certain searches/queries conducted on the site via our services, products and/or websites.

The information collected in usage or web server logs helps us to administer the services, products and sites, analyse usage, protect the product and/or website and content from inappropriate use, and improve the user's experience.

- **Cookies:** In order to offer and provide a customised and personal service through our products and websites, we may use cookies to store and help track information about the Data Subject. A cookie is a small text file sent to the Data Subject's device that we use to store limited information about the Data Subject's use of the services, products or website. **Opes Wealth** uses cookies to provide the Data Subject with certain functionality (such as to enable access to secure log-in areas and to save the Data Subject having to re-enter Information into product, services or website forms) and to personalise our services, products or website content. Without cookies, this functionality would be unavailable.

Retaining of Information:

Opes Wealth may retain personal information for purposes of reporting, administration, monitoring its website or to communicate with Data Subjects. Information may be retained only to serve the purpose of collecting the Information and be deleted/destroyed once the purpose has been fulfilled, subject to other regulatory requirements where Information is to be kept for a specific prescribed period.

Correcting / Amending / Updating / Deletion of Information:

Data Subjects are required to inform **Opes Wealth** should there be any changes to the Information kept by us. A Data Subject may request **Opes Wealth** to correct, amend, update or delete its Information at any time when applying or making use of any financial products or services of the business, by contacting the Information Officer at the contact details provided above. **Opes Wealth** will take all reasonable steps to confirm the Data Subject's identity before making changes to Information.

Information Security:

Opes Wealth shall apply the following measures to ensure security of Personal Information:

- **Opes Wealth** will take all reasonable precautions to protect Information from loss, misuse, unauthorised access, disclosure, alteration and destruction.
- **Opes Wealth** will not sell, rent, or lease mailing lists with Information to third parties and will not make a Data Subject's Information available to any unaffiliated parties, except for approved agents, suppliers and contractors, or as otherwise specifically provided for, as agreed with the Data Subject in writing or as required in terms of any Law.
- **Opes Wealth** may disclose Information of a Data Subject or Information about a Data Subject's usage of our financial services, financial products, websites or mobile applications to unaffiliated third parties as necessary to enhance services, financial product experience to meet our obligations to content and technology providers or as required by law, subject to agreements in place that provide for the protection of Information of Data Subjects.
- **Opes Wealth** has implemented appropriate security measures to help protect Information against accidental loss and from unauthorised access, use, or disclosure. We store Information about Data Subjects in a restricted access server with appropriate monitoring and use a variety of technical security measures to secure Information, including virus protection software. We may also store and process Information in systems located outside our premises or the Data Subject's home country. However,

regardless of where storage and processing may occur, **Opes Wealth** takes appropriate steps to ensure that Information is protected as required under relevant Data Protection/Privacy laws.

- The Data Subject's access to some of our services and content may be password protected and non-disclosure of such usernames and passwords is required to ensure the safekeeping of the Data Subjects' Information. It is recommended that the Data Subject sign out and close the browser of the account or service at the end of each session.
- **Opes Wealth** is legally obliged to provide adequate protection of Information, hold and prevent unauthorised access and use of Information, we are therefore committed to ensure that all Information of the Data Subject (**Opes Wealth**, Clients and/or Employees) will be kept safe and secure and not be disclosed to any unauthorised third parties, without the consent of the relevant Data Subject.
- **Opes Wealth** may from time to time transfer Information within and between various worldwide locations in compliance with the country of origin's regulations and this Policy.
- Persons / Employees / Parties (as applicable) are not allowed to disclose any Information to any unauthorised third party as it may lead to a breach, disciplinary action and possible dismissal.
- **Opes Wealth** takes reasonable steps to protect Personal Information, which is held by **Opes Wealth**. We can however not guarantee the security of information transmitted to **Opes Wealth** electronically from Data Subjects and they do so at their own risk. **Opes Wealth** maintains administrative, technical and physical safeguards to ensure protection of information against loss, misuse or unauthorised access, disclosure, alteration or destruction of the information provided to us by the Data Subject or their employer.
- **Opes Wealth** seeks to ensure compliance with Data Protection / Privacy regulations, laws and industry best practices in respect to the security around personal information. Where the Data Subject is located in another country with other data protection/privacy laws, **Opes Wealth** may transfer Personal Information to such other countries but they may not always guarantee the same level of protection for Personal Information as the one in which the Data Subject resides. By providing information to us, the Data Subject consents to these transfers.