

# Privacy Policy

Seed Investment Consultants (Pty) Ltd  
Registration No. 1999/007999/07 / Authorised FSP No. 2346

("Seed Investments")

Seed Investments' Personal Information Protection Policy governs the Processing of your Personal Information. You may view the Personal Information Protection Policy by contacting Evan Smit, Deputy Information Officer via telephone on +27 21 914 4966 or via email on [evan@seedinvestments.co.za](mailto:evan@seedinvestments.co.za).

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Seed Investment Consultants (Pty) Ltd Reg.no.1999/007999/07. Authorised Financial Service Provider: 2346  
Directors: Ian de Lange, Vincent Arthur Heys, Sean Michael Farrell, Michele Dundulachis

1) What Personal Information Does Seed Investments Require?

1.1) *"Personal Information"* is defined in the Protection of Personal Information Act (Act no. 4 of 2013) (*"POPIA"*) as follows: Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

- Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;
- Information relating to the education or the medical, financial, criminal, or the employment history of the person;
- Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- The biometric information of the person;
- The personal opinions, views or preferences of the person;
- 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;
- The views or opinions of another individual about the person; and
- 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.

1.2) *"Processing"* is defined in POPIA as follows: Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including -

- The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, iteration, consultation or use;
- Dissemination by means of transmission, distribution or making available in any form; and
- Merging, linking, as well as restriction, degradation, erasure or destruction of information.

1.3) Seed Investments is a Responsible Party in respect of the Personal Information that you (Data Subject) provide to Seed Investments. Seed Investments processes the following types of Personal Information from you –

- Identification document;
- Proof of residential/business operating address;
- South African Income Tax registration number;
- South African VAT registration number (if applicable per individual/legal entity);
- Contact numbers;
- E-mail addresses;
- Banking details; and
- Policy numbers and market values.

## 2) Why Does Seed Investments Require Your Personal Information?

2.1) This Personal Information is required in terms of the Financial Intelligence Centre Act, 38 of 2001 and Seed Investments' Risk Management and Compliance Programme. The Personal Information forms part of Seed Investments' requirements when obtaining a discretionary mandate from you or opening an account to facilitate the relevant business activities.

2.2) Seed Investments needs your Personal Information to provide you with the following services -

- To establish a legal relationship with you;
- To populate the client account information required on the various on-boarding platforms to open your account;
- To generate statements and capture contact information related to this discretionary mandate or account; and
- Operational calculations as it pertains to fees and commissions.

## 3) How is Your Personal Information Processed?

3.1) Your Personal Information is processed remotely over a secured and encrypted virtual private network and at 810 The Cliffs, Niagara Road, Tyger Falls, Carl Cronje Drive, Bellville, 7530. Storage of your Personal Information takes place in 810 The Cliffs, Niagara Road, Tyger Falls, Carl Cronje Drive, Bellville, 7530.

3.2) No third-party providers have direct access to your Personal Information unless specifically required by law and to satisfy client due diligence principles.

3.3) Your Personal Information is shared with platforms with your knowledge, for account opening purposes.

## 4) How Long Does Seed Investments Keep Your Personal Information?

4.1) Under South African law, Seed Investments is required to keep your Personal Information for a five (5) year period following the date of termination of the business relationship according to Seed Investments' Personal Information Retention Policy. After this period, your Personal Information will be irreversibly destroyed. For more information on Seed Investments' Personal Information retention schedule, please refer to our Personal Information Retention Policy which can be accessed by contacting us at [evan@seedinvestments.co.za](mailto:evan@seedinvestments.co.za) or on +27 21 914 4966.

## 5) What Are Your rights?

5.1) Should you believe that any of your Personal Information held by Seed Investments is incorrect or incomplete, you have the right to request to view this information, rectify it or have it deleted. Please contact Seed Investments Deputy Information Officer at [evan@seedinvestments.co.za](mailto:evan@seedinvestments.co.za) or on +27 21 914 4966, should this be required.

5.2) In addition, if you wish to complain about how Seed Investments has handled your Personal Information, please contact the Deputy Information Officer at [evan@seedinvestments.co.za](mailto:evan@seedinvestments.co.za) or on +27 21 914 4966. Seed Investments Compliance Department will investigate your complaint and contact you within two (2) business days of the complaint being lodged and work with you to resolve the matter.

5.3) If your query relating to your Personal Information is not, in your opinion, adequately dealt with, you can contact the Information Regulator on +27 12 406 4818 or [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za) to file an official complaint.