PRIVACY POLICY

Introduction

SDC Wealth Management (Pty) Ltd is an **Authorised Financial Services Provider** regulated by the **Financial Sector Conduct Authority (FSCA)**. We are committed to protecting your privacy and ensuring that your personal information is collected, processed, stored, and shared lawfully, fairly, and securely in line with:

- The **Protection of Personal Information Act, 4 of 2013 (POPIA);**
- The **Promotion of Access to Information Act (PAIA);**
- The **Financial Advisory and Intermediary Services Act (FAIS)**;
- The **Financial Intelligence Centre Act (FICA)**;
- The **Companies Act**;
- The **Electronic Communications and Transactions Act (ECT Act)**;

Any other applicable legislation that requires the collection, use, or retention of personal information.

Our Data Protection Values

We are guided by the following values when processing your information:

1. Fairness and trustworthiness in how we use your data.
2. Transparency about what we collect, why, and who we share it with.
3. Responsiveness to any privacy-related queries or concerns.
4. Taking all reasonable steps to safeguard your data.
5. Compliance with laws and cooperation with regulators.

Information Officer Contact Details

Our Information Officer has been duly appointed and registered with the Information Regulator in terms of POPIA.

Information Officer:	Jan Harm Eloff
Email:	janharm@sdcwealth.co.za
Telephone:	010 900 3809
Physical Address:	24 Achter Road, Paulshof, Sandton, 2191

What Information We Collect

We collect and process personal information necessary to provide financial services, including but not limited to:

- **Identification:** name, ID/passport number, date of birth, tax number.
- **Contact**: phone, email, postal and physical address.
- **Financial:** banking details, salary, assets, liabilities, credit history.
- **Employment:** employer, occupation, income.
- **Regulatory:** FICA/KYC documentation, SARS details.
- **Special categories:** health/medical information (with explicit consent, if relevant).
- **Children's details:** dependents or beneficiaries (with parental/guardian consent).

How We Collect Information

We collect information in different ways, including electronic communication:

- Directly from you (applications, calls, emails, meetings, online forms).
- Indirectly, with your consent or as allowed by law (insurers, product providers, credit bureaus, public records).
- Through our website (cookies, analytics, calculators, online tools).

In line with the Electronic Communications and Transactions Act (ECT Act):

- A data message is deemed sent when it enters an information system outside the sender's control.
- A data message is deemed received when it is capable of being retrieved in the addressee's designated system.
- Place of dispatch and receipt is deemed to be our usual place of business.
- You do not need to use digital signatures, encryption, or authentication for these communications to be valid.
- If you send us a message from your device, we will treat it as authorised by you personally.

Why we Collect and Use Your Information

We process your personal information only for the purposes for which it was collected and agreed upon, for example:

- Providing financial advice and intermediary services.
- Performing needs analyses, preparing quotes, and processing applications.
- Complying with legal duties (FAIS, FICA, SARS, Companies Act).
- Underwriting, claims processing, fraud detection, and risk management.
- Maintaining client records and audit trails.
- Communicating products or regulatory updates.
- Research, service improvement, and customer satisfaction surveys.

Legal bases: contract performance, legal obligations, legitimate interests, and consent (where required, e.g., for direct marketing or sensitive data).

Cookies and Website Use

When you use our website, we collect standard usage data through cookies. These help us:

- Improve site functionality.
- Store inputs temporarily in calculators/tools.
- Display relevant content or advertising.

Cookies are anonymised and do not track browsing beyond our website. You may disable cookies in your browser settings.

Directors: Daniel Gibhard | Jan Harm Eloff | **Reg No:** 2016/367582/07 | **VAT No:** 4780287696
JHB: 24 Achter Road, Paulshof, Sandton, 2191

010 900 3809 info@sdcwealth.co.za www.sdcwealth.co.za

Confidentiality Obligations

Under Section 3(1)(c) of the FAIS General Code of Conduct, we are legally required to maintain client confidentiality and only use personal information for the purposes it was provided.

How We Protect Your Information

We apply layered safeguards to protect your data:

- Physical security and access controls.
- IT and network security (encryption, firewalls, secure communications).
- Role-based access with confidentiality undertakings.
- Incident monitoring, investigation, and response.
- Governance and compliance oversight.
- Third-party contracts requiring equivalent data protection.

In the event of a security compromise (data breach), we will notify the Information Regulator and affected data subjects as soon as reasonably possible, including the nature of the breach, possible consequences, measures taken, recommendations, and (if known) the identity of the unauthorised party.

Retention of Information

We retain information only as long as necessary, including:

- 5 years after termination of a client relationship (FICA).
- Longer if required for legal/regulatory proceedings.
- After that, secure deletion or anonymisation.

Sharing Your Information

We may share your personal information with:

- Product providers, insurers, and investment platforms.
- Regulators and authorities (FSCA, SARS, FIC, Ombuds, courts).
- Auditors, compliance officers, and professional advisers.
- IT and service providers, subject to confidentiality obligations.

We do not and will not sell your information.

Cross-Border Transfers

If information is transferred outside South Africa, we ensure compliance with Section 72 of POPIA by contracting only with parties subject to binding agreements or laws providing equivalent protection.

Your Responsibilities

You are responsible for ensuring your personal information remains accurate and up to date (e.g., notifying us of address or contact detail changes).

Your Rights as a Data Subject

You have the right to:

- Access personal information we hold about you (subject to lawful fees).
- Request correction or deletion of inaccurate or outdated data.
- Object to processing, including direct marketing.
- Withdraw consent where processing is based on consent.
- Lodge a complaint with the Information Regulator:
  Email: POPIAComplaints@inforegulator.org.za
  Website: https://inforegulator.org.za

Complaints and Escalation

- You may contact our Information Officer (see Section 3) to raise concerns, request updates, or provide feedback.
- We will acknowledge complaints within 2 business days and provide a final response within 15 business days, unless extended under law.
- If you are not satisfied, you may escalate the matter to the **Information Regulator** using the details provided in Section 14.

Changes to This Policy

We may amend this Privacy Policy from time to time. The most recent version will always be available on our website and provided to clients on request. Any changes will become effective upon posting the revised version.