

THE PROTECTION OF PERSONAL INFORMATION ACT PRIVACY NOTICE

This privacy notice applies to personal information processed by the Gradidge Mahura Group which includes: -

- Gradidge-Mahura Investments (GMI)
- Gradidge-Mahura Asset Protection (GMAP)
- Gradidge-Mahura Asset Management (GMAM)
- Gradidge-Mahura Fiduciary Services (GMFS),

in connection with products and/or services we offer in accordance with the requirements of the Protection of Personal Information Act (POPIA).

Privacy Statement

The Gradidge-Mahura Group is committed to processing personal information in accordance with the below principles when collecting, recording, storing, disseminating, and destroying personal information, and responding to government requests for our users' data:

- I. We shall not contact/solicit you unless you have given us your consent to do so.
- II. We shall process information for a specific, lawful reason and only adequate, relevant information which is limited to the purposes for which they are processed and which relates to the functions or the activity of the organisation.
- III. We inform clients up front that we will be processing data in fulfilment of their request. If you cancel your services with *the Gradidge Mahura Group*, we will delete or otherwise de-identify your personal information after the minimum storage periods required under our risk and statutory record keeping periods have expired.
- IV. We take measures to ensure data is kept safe and prevent loss of, damage to, or unauthorized destruction of personal information, and unlawful access to or processing of personal information.

Security

A client has a right to object to the use of personal information, however in certain instances failure to provide us with personal information may result in the inability to deliver said services or products to you, or alternatively you shall receive limited services. *The Gradidge Mahura Group* collects information directly from you where you provide us with your personal details. In addition to the aforementioned we shall, subject to your consent, obtain further information required from third parties and other sources where necessary. *The Gradidge Mahura Group* does not collect and process special personal information unless it is a requirement by law to process such information as part of our service delivery, in which case we shall obtain consent from you before collection thereof. We do not knowingly collect personal information from children (under 18 years of age) without the permission of their parent/s or guardian.

Disclosure

The Gradidge Mahura Group and its employees may disclose personal information: to other services providers involved in the rendering of services or the provision of products to the clients; to services providers it is engaged with such as accountants, compliance officers, administration etc.; if *the Gradidge Mahura Group* has a duty or a right to disclose same in terms of law or certain industry codes; or if it is necessary to protect the *Gradidge Mahura Group's* legal rights and interests. We undertake to review and update our security measures in accordance with future legislation and technological advances. Access to client data from within our organisation is limited to essential staff or specialist contractors that are required to access our systems for client service or maintenance purposes, who are bound by the requirements of the legislation and are required to maintain safety and security measures. The organisation will not transfer personal information to a third party in a foreign country without ensuring that it complies with the provisions of POPI.

Policy Changes

This notice was last revised on 01/06/2021. Any material changes hereto will be published on our website or distributed to clients in writing. Your continued use of our services following the update means that you accept the *Gradidge Mahura Group's* updated notice.

Questions or Complaints

Should you have any questions relating to this notice or wish to lodge a complaint relating to an interference with the protection of personal information, you can contact the Information Officer.

Our Information Officer is: *Tatenda Erica Macheka, Practice Manager* at tatenda@gminvestments.co.za

OR the Deputy Information Officer: *Cyril Chetty, Chief Operating Officer* at cyril@gminvestments.co.za .