



POPI POLICY

1. INTRODUCTION

1.1 Licwidity (Pty) Ltd is an authorised financial services provider who is obliged to comply with the Protection of Person Information Act (“POPI”)

1.2. POPI requires Licwidity (Pty) Ltd to inform their clients as to how their Personal Information is used, disclosed and destroyed.

1.3. Licwidity (Pty) Ltd guarantees its commitment to protecting their client’s privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.

1.4. This Policy set out is how Licwidity (Pty) Ltd deals with their client’s Personal Information and in addition for what purpose the said information is used for. This Policy is made available on our company website and by request from our offices.

1.5. POPI states that “Personal Information may only be processed if given the purpose for which it is processed; it is adequate, relevant and not excessive.

2. THE PERSONAL INFORMATION COLLECTED

2.1. Licwidity (Pty) Ltd collects and processes clients Personal Information pertaining to clients financial planning needs. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, we will inform the client what information they are required to provide us with and what information is optional. Examples of the Personal Information we collect includes but is not limited to:

2.1.1. clients identity number, name, surname, address, postal code, marital status and how many dependents they have;

2.1.2. description of clients residence, business, assets and liabilities; and

2.1.3. any other information required by us, suppliers and insurers in order to provide clients with an accurate analysis of their financial planning needs.

2.2 Licwidity (Pty) Ltd also collects and processes clients Personal Information for marketing purposes to ensure our products and services remain applicable to our clients and potential clients.

2.3 We have agreements in place with all our products suppliers, insurers and third party service providers to ensure there is a mutual understanding with regard to the protection of client Personal Information. Our suppliers are subject to the same regulations as we are subjected to.



2.4 We may also supplement the information provided with information we receive from other providers in order to offer a more consistent and personalised experience in clients' interaction with us.

2.5 For purposes of this Policy, clients include potential and existing clients. 3. HOW PERSONAL INFORMATION IS USED

3.1 Clients Personal Information will only be used for the purpose for which it was collected and agreed. This may include:

3.1.1 Providing products or services to clients and to carry out the transactions requested;

3.1.2 For underwriting purposes;

3.1.3 Assessing and processing claims;

3.1.4 Confirming, verifying and updating clients details;

3.1.5 For purposes of claims history;

3.1.6 For the detection and prevention of fraud, crime, money laundering or other malpractice;

3.1.7 Conduction market or customer satisfaction research;

3.1.8 For audit and record keeping purposes;

3.1.9 In connection with legal proceedings;

3.1.10 Providing our services to clients to carry out the services requested and to maintain and constantly improve the relationship;

3.1.11 Providing communications in respect of Licwidity (Pty) Ltd and regulatory matters that may affect clients; and

3.1.12 In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

3.2 In terms of the provisions of POPI, Personal Information may only be processed if certain conditions are met which are listed below along with supporting information for Licwidity (Pty) Ltd processing Personal Information:

3.2.1 Client consents to the processing – consent is obtained from clients during the introductory , appointment and needs analysis stage of our relationship;



3.2.2 The processing is necessary – in order to conduct an accurate analysis of clients financial planning needs, certain Personal Information required;

3.2.3 Processing complies with an obligation imposed by law on Licwidity (Pty) Ltd – The Financial Advisory and Intermediary Services Act (“FAIS”) requires Financial Service Providers (“FSPs”) to conduct a needs analysis and obtain information from clients about their financial planning needs in order to provide them with applicable and beneficial products.

3.2.4 Processing protects the legitimate interest of the client – it is in the client’s best interest to have a full and proper needs analysis performed in order to provide them with an applicable and beneficial product, this requires obtaining Personal Information;

3.2.5 Processing is necessary for pursuing the legitimate interest of Licwidity (Pty) Ltd or of a third party to whom information is supplied. In order to provide our clients with products we, suppliers and insurers need certain personal information from clients to make an expert decision on the specific product they require.

4. DISCLOSURE OF PERSONAL INFORMATION

4.1 We may disclose clients’ Personal Information to our providers whose services or products clients elect to use. We have agreements in place to ensure that they comply with confidentiality and privacy conditions.

4.2 We may also share client Personal Information with and obtain information about clients from third parties for the reasons already discussed in 2.4 above.

4.3 We may also disclose client’s information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect our rights.

5. SAFEGUARDING CLIENTS INFORMATION

5.1 It is a requirement of POPI to adequately protect the Personal Information we hold and to avoid unauthorised access and use of your Personal Information. We will continuously review our security controls and processes to ensure that your personal Information is secure.

5.2 When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that your Personal Information is kept secure.

5.3 We may need to transfer your Personal Information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with a similar level of protection as afforded to you by us.



6. ACCESS AND CORRECTION OF PERSONAL INFORMATION

6.1 Clients have the right to access the Personal Information we hold about them. Clients also have the right to request us to update, correct or delete their Personal Information on reasonable grounds. Once a client objects to the processing of their Personal Information, Licwidity (Pty) Ltd may no longer process said Personal Information. We will take all reasonable steps to confirm our clients' identity before providing details of their Personal Information or making changes to their personal Information

6.2 The details of our Information Officer and head office are as follows:

INFORMATION OFFICER DETAILS Andre Jansen van Vuuren 0824515266
Physical Address: 9 Banhoek street, Stellenberg, 7550 Email Address: info@licwidity.co.za
Website: www.licwidity.co.za

7. AMENDMENTS TO THIS POLICY Amendments to this Policy will take place on an ad hoc basis or at least once a year. Clients are advised to check our website periodically to inform themselves of any changes. Where material changes take place clients will be notified directly.