

THE PROTECTION OF PERSONAL INFORMATION ACT

CUSTOMER PRIVACY NOTICE

This Notice explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act (“POPIA”).

At Merriman Consultants CC / Jan Hagen / JH Hagen Beleggingsdienste CC (and including this website, POPIAct-Compliance) we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

About the Company

This privacy statement applies to all companies within this group that are domiciled in South Africa. These companies and their addresses are as follows:

- Merriman Consultants CC 48 Soshanna Street, Kenridge, Bellville, 7530
- JH Hagen Beleggingsdienste CC 48 Soshanna Street, Kenridge, Bellville, 7530
- Jan Hagen 48 Soshanna Street, Kenridge, Bellville, 7530

The information we collect

We collect and process your personal information mainly to contact you for the purposes of understanding your requirements, and delivering services accordingly. For this purpose we will collect contact details including your name and organization.

We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.

Website usage information may be collected using “cookies” which allows us to collect standard internet visitor usage information.

How we use your information

We will use your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal or research purposes.

For example:

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorized user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

Disclosure of information

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

Information Security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

Your Rights: Access to information

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers/addresses as provided on our website and specify what information you require. We will need a copy of your ID document to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

Correction of your information

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate.

Definition of personal information

According to the Act “personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act, Merriman Consultants CC / JH Hagen Beleggingsdienste CC / Jan Hagen also includes the following items as personal information:

Depending on the type of business we conduct with you or the relationship you have with us, we may process the following types of personal information:

- name
- race (for employment purposes or as otherwise required by applicable law)
- gender
- marital status
- nationality
- age
- language preference
- date of birth
- information relating to education, financial, criminal or employment history of a person
- identifying numbers such as identity or passport number, tax identification numbers or
- tax reference numbers
- e-mail address
- physical address
- telephone number

How to contact us

If you have any queries about this notice; you need further information about our privacy practices; wish to withdraw consent; exercise preferences or access or correct your personal information, please contact us at the numbers/addresses listed on this letterhead.

The information Regulator

You may complain to the Information Regulator. Any person may submit a complaint to the Information Regulatory in the prescribed manner and form alleging interference with the protection of the personal information of a data subject. A data subject may also submit a complaint in respect of a determination of an adjudicator.

The address of the Information Regulator is as follows:

The Information Regulator (South Africa)
33 Hoofd Street
Forum III, 3rd Floor Braampark
PO Box 31533 Braamfontein, Johannesburg, 2017
Complaints email: complaints.IR@justice.gov.za
General enquiries email: infoereg@justice.gov.za

Updates to this privacy statement

This privacy statement is dated as of 1 July 2021. We may update the privacy statement from time to time. The current privacy statement will be available on our website or available upon request from our office. Please check our website on a regular basis – www.merrimanconsultants.com