

Data Protection and Confidentiality of Client Records Policy

Scope

This policy applies to the management and staff of Capstone. For purposes of this Policy, clients include potential and existing clients/investors.

Purpose

This Policy governs how Capstone deals with their client's Personal Information.

This policy also aims to satisfy the POPI requirement that Capstone should inform their clients as to how and for what purpose their Personal Information is used, to whom such information is disclosed and how information will be destroyed.

This Policy is made available on our company website www.cstone.co.za and on request from our offices.

Background

Capstone is an authorised financial services provider who is obliged to comply with the Protection of Personal Information Act ("POPI").

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.

Policy

Capstone 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.

We subscribe to all the principles stated in the POPI Act.

Personal Information Collected

Capstone do not generally collect direct client information, unless clients who invested in our funds elect to communicate with us or request more information (e.g. monthly reports) from us.

The type of information collected will depend on the need for which it is collected and will be processed for that purpose only.

Whenever possible and relevant we will assist clients with distinguishing between optional information requests and required information requests.

Examples of the Personal Information we collect includes but is not limited to:

- Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, age, physical or mental health, well-being, disability, language and birth of the client.

- Information relating to the education or the medical, financial, criminal or employment history of the client.
- Identifying number, symbol, e-mail address, physical address, telephone number, location information or other particular assignment to the client.
- Correspondence sent by the client 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 client; and
- The name of the client if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the client/policy holder.

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.

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.

How personal information is used

Clients Personal Information will only be used for the purpose for which it was collected and agreed.

This may include:

- Providing products or services to clients and to carry out the transactions requested.
- Conducting credit reference searches or verification.
- Confirming, verifying and updating clients' details.
- For the detection and prevention of fraud, crime, money laundering or other malpractice.
- Conducting market or customer satisfaction research.
- For audit and record keeping purposes.
- In connection with legal proceedings.
- Providing our services to clients to carry out the services requested and to maintain and constantly improve the relationship.
- Providing communications in respect of Capstone and regulatory matters that may affect clients; and
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

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 Capstone processing for Personal Information:

- Client consents to the processing – consent only required where the information will be used for something other than the intended use for which the information is supplied by the client.
- The processing is necessary – in order to provide the client with the required insurance product.
- Processing complies with an obligation imposed by law on Capstone.
- Processing protects the legitimate interest of the client.

- Processing is necessary for pursuing the legitimate interest of Capstone or of a third party to whom information is supplied. In order to provide our clients with products we need certain personal information from clients to provide expert products.

Disclosure of Personal Information

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.

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. Any request/amendments to records may be done by completing the "request for access to record of a private body form" which is available on our website.

Safeguarding client information

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.

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.

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.

Access and correction of Personal Information

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, Capstone 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.

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

Officer Details

Name: Wayne Smith
Email: Wayne@cstone.co.za

Head Office Details

Telephone Number: (0)11 477 0062
Weltevreden Park
1715
South Africa

Physical Address: Unit 2 Constantia View Office Park
2 Hogsback Road
Quellerina
Gauteng
South Africa

Website: www.cstone.co.za

Information Regulator Information is as follows:

Telephone Number: 010 023 5200
Website: infoeregulator.org.za
Email: enquiries@infoeregulator.org.za

Consequences of Non-Adherence

Staff members who do not treat client information with the utmost confidentiality will be subject to disciplinary procedures.

Training and Awareness

Staff members will receive a copy of this policy on employment and will receive training on this policy if complaints management and handling falls in their scope of duties.

Review

This policy will be reviewed as and when required.