

Sovereign Trust (SA) Limited

Privacy Notice for provision of consulting services ("the Services")

1. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it in order to provide the Services to you. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the 'How to contact us' section.

This Privacy Notice may be updated and/ or re-issued at any time, and we will provide you with notice of any such updates via either email and/or Website.

2. What Personal Data is

'Personal information' is defined broadly in POPIA to include information relating to both an identifiable, living, natural person, and where applicable, an identifiable juristic person or legal entity, and includes:

- information about a person's race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language, and birth;
- information relating to the education, medical, financial, criminal, or employment history of the person;
- any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
- the personal opinions, views, or preferences of the person;
- correspondence sent by the person 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 person; and
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

POPIA provides for a separate category of information called 'special personal information' which includes all information relating to a person's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information or criminal behaviour. POPIA also specifically regulates personal information of a child.

3. Personal Data we collect

The Personal Data we collect about you will be the minimum necessary to provide the Services. The type of Personal Data we collect is outlined in the table below in the section entitled 'Purposes, lawful bases and retention periods'.

4. Criminal offence data

Criminal offence data refers to personal data relating to criminal convictions and offences or related security measures. This covers information about offenders or suspected offenders in the context of criminal activity, allegations, investigations and proceedings. For example, we may collect this information when conducting background screening checks on you using World-Check or if you declare any criminal convictions to us.

5. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text or email.

We may also need to collect Personal Data from third parties such as your:

- 1) Financial or tax advisor;
- 2) Attorney;
- 3) Accountant; or
- 4) Any other third party whom you have given consent to share information with us or instructed us to collect Personal Data from.

6. Cookies

The Sovereign Group uses cookies, pixels, and other technologies (collectively referred to as "cookies") to recognize your browser or device, learn more about your company or industry, and provide you with essential features and services, as well as for additional purposes, including:

- i. Recognizing you when you sign-up to use our services. This allows us to provide each user or data subject with customized features and services, if applicable.
- ii. Conducting research and diagnostics to improve the Company's website content, products, and services.
- iii. Preventing fraudulent activity.
- iv. Improving security.
- v. Delivering content, including ads, relevant to your interests.
- vi. Reporting. This allows us to measure and analyse the performance of our services.

You can manage browser cookies through your browser setting. The "Help" feature on most browsers will tell you how to prevent your browser from accepting new cookies; how to have the browser notify you when you receive a new cookie; how to disable cookies; and when cookies will expire. If you disable all cookies on your browser, the Sovereign Group, nor any of its third parties, will transfer cookies to your browser. If you do this, however, you may have

to manually adjust some preferences every time you visit a site, and some features and services may not work.

For further information about cookies and how we use them, please see our [Cookie Notice](#).

7. Purposes, lawful bases and retention periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:



Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
Client	Name and surname, email address, physical and postal address, source of wealth and source of funds information	Incorporation and maintenance of the company or trust structure.	Contract	At least (5) years and maximum (7) years after termination of service, as set out in applicable laws.
Client	Name and surname, job title, email address, physical and postal address, phone number, employment history, tax number, banking details, nationality and residency status, criminal offence data, identity and/or passport number, source of wealth and source of funds information.	To conduct due diligence (background checks) which may reveal information about criminal convictions or offences.	Legal obligation	At least (5) years and maximum (7) years after termination of service, as set out in applicable laws.
Client	Name and surname, email address, physical and postal address, phone number, employment history, tax number, banking details, nationality and residency status, identity and/ or passport number.	For reporting purposes (i.e. to tax authorities and regulators).	Legal obligation	At least (5) years and maximum (7) years after termination of service, as set out in applicable laws.



Client	Name and surname, job title, work email address, phone number, company you work for.	To send you newsletters and other promotional material	Consent	At least (5) years and maximum (7) years after termination of service, as set out in applicable laws
---------------	---	---	----------------	---

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

8. Marketing

We would like to send you information about our products and services, events and news, which may be of interest to you. Where we have your consent or it is in our legitimate interest to do so, we may do this by email, telephone or social media. You can unsubscribe at any time by using the 'unsubscribe' link in emails or by contacting us at marketing@sovereigngroup.com.

For further information about Sovereign Group's Marketing Privacy Notice, please access same here : [Sovereign Group Marketing Privacy Notice - The Sovereign Group](#)

9. Sharing your Personal Data

Sovereign Trust (SA) Limited will not share your personal data with any third parties in the course of providing consulting services, unless agreed to by you or as required in terms of a legal requirement.

10. Retention

We will retain your personal data for as long as is necessary to provide the services which you have requested from us.

Your information is securely stored on Sovereign Trust's IT servers and electronic devices. We retain your personal data in accordance with the retention periods set out in the table above and will then dispose of your information by deleting it from our servers and electronic devices.

However, we may need to retain some records for a longer period where this is required for us to be able to comply with our legal obligations.

We may also need to retain your personal data for a longer period where this is required in relation to legal claims, although this is rare.

11. International Transfers

Your personal data will be shared within the Sovereign Group. This may include transferring your personal data to other Group offices.

Other Sovereign Group offices may also share your personal data with 3rd party service providers. If we do so, we will enter into appropriate contractual arrangements to oblige the entities in those countries to operate to appropriate data protection standards.

These standards include Standard Contractual Clauses (SCCs) approved by the European Commission, which contractually oblige the entities in those countries to operate to the data protection standards expected within the EU/EEA.

In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the data processing contract between us.

9. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**
You have the right to restrict our use of your Personal Data.
- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to withdraw consent**
If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.
- **Right to lodge a complaint**
Any person may in writing, submit a complaint to the Information Regulator in the event of alleged interference by completing Form 5 and submitting it to POPIAComplaints@info regulator.org.za. POPIA provides that, after receipt of a complaint, the Information Regulator is obliged to investigate the complaint, act as a conciliator where appropriate and take further action as contemplated by POPIA.

Contact details can be found on the Information Regulators website:

[Home - Information Regulator \(info regulator.org.za\)](http://info regulator.org.za)

Telephone: +27 010 023 5200

Email: enquiries@info regulator.org.za

Office address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 200

How to exercise your rights

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Information Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

10. How to contact us and our Information Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact our Information Officer as follows:

Attention: Timothy Mertens

Address: Block A, 2nd Floor, 7 West Quay Road, V&A Waterfront, Cape Town, 8001

Email: sact@sovereigngroup.com

Tel: +27(0)21 418 2170

11. Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below.

Any amendments to our privacy notices will be communicated via our website: www.sovereigngroup.com