



Registration number: 2019/340556/06

DATA PROTECTION & PRIVACY NOTICE

**Prepared in accordance with the
requirements of the Protection of
Personal Information Act, 2013**

**DATE OF COMPILATION: 22/07/2021
DATE OF REVISION: 12/02/2025**

INTRODUCTION

This Data Protection & Privacy Notice ("this Notice") describes a baseline set of common principles governing the handling of Personal Data.

At **DEmpower Limited** (Hereinafter referred to as **DEmpower**) we are committed to protecting your privacy and ensuring that your personal information is collected and used properly, lawfully and transparently.

The purpose of this Notice is to describe the way that we collect, store, use and protect information that can be associated with you or another specific natural or juristic person ("data subjects") and can be used to identify you or that person (personal information), in accordance with the requirements of the **Protection of Personal Information Act ("POPIA")**.

"Data subjects" are any party to whom personal information relates.

PERSONAL INFORMATION

Common examples of the types of personal information which we may collect and process, include your:

- Identifying information – such as name, date of birth, identification number;
- Contact information – such as phone number, e-mail address;
- Address information – such as physical address or postal address; or
- Biographical information – such as gender, marital status, details of family members, previous job history and/or education details.

Depending on the services that you require, we may also collect sensitive personal information. Common examples include, your:

- Financial information – such as bank account details;
- Sensitive demographic information – such as race or ethnicity;
- Medical information – such as information about physical or mental health;
- Criminal information – such as information about your commission or alleged commission of any offence or about any related legal proceedings;
- Beliefs - such as political or religious beliefs.

We will endeavour to collect only the minimum amount of personal data required to carry out our services and to comply with relevant laws.

OUR APPROACH

We value our partners, clients and stakeholders, and appreciate the importance of treating personal data as confidential. We will use your personal information only for the purposes for which it was collected and agreed with you.

We require any nominated representatives who are entrusted with your personal data, as part of their job responsibility, to treat it as confidential and in conformity with this Notice.

We will also seek to ensure that any third-party service providers we utilise are bound to maintain confidentiality when handling your personal data on our behalf, in a manner that is consistent with this Notice.

We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

CHANGES, ACCESS, UPDATES OR REMOVING

We may change the terms of this Notice at any time, and you will be notified of any changes made, via e-mail, detailing the changes and indicating the date that they were last updated.

You have the right to request a copy of the personal information we hold about you. To do this, you can contact us at the number and e-mail address as provided at the end of the Notice and specify what information you require. We will need a copy of your Identity Document to confirm your identity before providing details of your Personal Information.

You may also choose to correct, update or remove the personal information that you have submitted to us by contacting us via e-mail or phone.

THE PURPOSE FOR PROCESSING PERSONAL DATA

Your personal data may be used for the following purposes:

- To fulfil our obligations to you.
- To contact and liaise with you and manage our relationship with you so that we can carry out our services at the agreed upon and required standards.
- To store e-mails and documents that have been generated by and received from you, on systems that we administer.
- To manage services as included in **DEmpower's** scope of work, such as: investment management and related activities and services and ensuring persons with disabilities' inclusion, meaningful participation and direct benefit in the economic mainstream of South Africa.
- For security purposes and for authentication.
- To facilitate business travel and travel-related support.
- For internal and external auditing, insurance and risk management purposes.
- For statistical analysis and research purposes in the context of investments.

THE COLLECTION OF INFORMATION

- We collect and process personal information for the purposes of contacting you, understanding your requirements, and delivering professional services accordingly.
- We collect information directly from you where you provide us with personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.
- When you request our services, you may be asked to provide us with additional information on a voluntary basis (services information).
- We may use or process services information, or optional information that you provide to us, for the purposes that you indicated when you agreed to provide it to us.
- Processing includes collecting your personal information, disclosing it and combining it with other personal information.
- We generally collect and process your personal information for various purposes, including services purposes (such as providing our services); business purposes (such as investments and other proposed and actual transactions);

and legal purposes (such as pursuing good governance and statutory compliance).

- **CONSENT:** We will obtain your consent to collect personal information in accordance with applicable law & when you provide us with any optional information.

DATA ACCURACY AND CURRENTNESS

We will endeavour to keep personal information as up to date, accurate and complete as necessary for the purposes as defined in this Data Protection & Privacy Notice. Please note that in order for us to better protect you and safeguard your personal information, we take steps to verify your identity before making corrections to your personal information.

We would appreciate it if you would keep your personal information accurate.

DISCLOSURE

Information Sharing

- We do not share your personal information but, at times, we may disclose your personal information to:
 - Service providers under contract with us 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 POPIA.
 - Banking partners
 - Other third parties who provide us with relevant services where appropriate
- We may also disclose your information where we believe it is necessary to protect our rights.
- We may disclose personal information if required: as part of governmental audits; to comply with any law; by court order or subpoena; to protect the safety of any individual or the general public or to prevent a violation of our customer relationship terms.
- No personal information will be disclosed to anyone except as provided for in this Data Protection & Privacy Notice.

Nominated representatives and Norfolk Admin Support Services (“NASS”)

- We may need to disclose personal information to our nominated representatives and employees of Norfolk Admin Support Services (who fulfil the function of processing our accounting; making payments and the administration of our data) as they require the personal information to do their jobs.

DATA SECURITY

Maintaining the security and integrity of personal data is a high priority for us and we strive to maintain appropriate administrative, personnel, technical and physical measures to safeguard personal data against loss, theft and unauthorised uses or modifications.

We always do our best to comply with applicable data protection laws and we only authorise access to personal information for those who require it to fulfil their job responsibilities.

We expect nominated representatives to contribute to the security culture of **DEmpower** by following appropriate security policies and procedures and completing all assigned documentation and/or trainings. We implement disaster recovery procedures where necessary and appropriate.

DATA RETENTION

We keep records of your personal data no longer than necessary for the purpose for which we obtained them and for the purposes explicitly set out in this Notice, unless the retention of the record is required or authorised by law; or you have consented to the retention of the record.

During the retention period, we will continue to abide by our non-disclosure obligations. We may retain your personal information in physical or electronic records at our discretion.

INCIDENT MANAGEMENT

DEmpower will notify you without undue delay after becoming aware of a Personal Data breach and we will provide you with sufficient information, which will allow for any reporting obligations to be met, under Data Protection Laws. The remediation measures will: (i) start without undue delay, (ii) be completed within a reasonable period after **DEmpower** has become aware of a Personal Data breach, and (iii) be carried out within the regular business hours of the local office where the remediation measures are required to be taken.

CONTACT

If you have any questions, queries or concerns arising from this Data Protection & Privacy Notice or in the way that we handle personal information, please contact the Information Officer:

Name: Nyameka Mqikela

E-mail: info@dempower.co.za

You have the right to lodge a complaint with the South African Information Regulator, at any time, relating to data protection issues (<https://www.justice.gov.za/inforeg/>). We would, however, appreciate the chance to deal with any concerns that you may have, before you approach the South African Information Regulator. If you have a complaint, please contact us in the first instance.