

# Privacy Notice

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2021



**MERGENCE**  
INVESTMENT MANAGERS



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## Introduction

Respecting and protecting your personal information is very important to us. It is your Constitutional right to have your personal information protected; it is also good business practice as well as a legal requirement in terms of the Protection of Personal Information Act (“POPIA”) from 1 July 2021. We take the requirements and content of POPIA very seriously.

For the purposes of this notice, ‘Mergence’ means Mergence Group (Pty) Ltd and all of its subsidiaries and associated companies.

### 1. What is personal information?

Personal information is information relating to a natural or juristic person which can be used to identify or contact them. Personal information can be almost any information that is associated with an identifiable living individual. This personal information can include correspondence, recordings, images, alpha -numerical identifiers and combinations of these. Please refer to the definition at the end of this notice.

### 2. How Mergence uses your personal information

We will use information only for the purposes for which it was collected or agreed to. This includes the following purposes:

1. To provide relevant product and services to you
2. To meet a legal or regulatory requirement
3. For audit and record keeping purpose.
4. For reporting and administration;
5. For research purposes or
6. To communicate directly with you to maintain our relationship.

### 3. Who processes your personal information?

Mergence will process your information in the course of business to execute and give due effect to its services to you as client. In the event that Mergence may need to share your personal information with third party service providers for the relevant services to be provided to you, we will take and ensure that all reasonable measures are in place to adhere to the conditions set out in the Act.

We will not sell, rent, or lease mailing lists or other customer data to others, and we will not make your personal information available to any unaffiliated parties, except our approved agents, suppliers, and contractors, or as otherwise described in this Privacy Notice.



#### 4. Protection of personal information

Mergence values the information that you choose to provide to us and will therefore take all reasonable steps to protect your personal information from loss, misuse or unauthorised alteration. We maintain administrative, technical, and physical safeguards to protect your personal information. Mergence endeavours to implement data protection/privacy regulations, laws and industry best practices in respect of security around personal information.

#### 5. Storing and deleting your personal information

Personal information of data subjects will be held as long as is necessary in line with the purposes for which it was collected. The length of the storage period is determined by relevant local data preservation and protection laws and regulations.

We will delete your personal information once it is no longer required for processing purposes. Where regulatory requirements require us to keep your personal information for a longer period, we will be obliged to do so.

#### 6. Access and correction of personal information

You have a right to have a copy of your personal information by contacting the Mergence Information Officer, details of whom can be found below.

You also have a right to require that any inaccurate personal information that we have of you is corrected.

<b>Information Officer</b>	Fabian De Beer
<b>Deputy Information Officer</b>	John Afordofe
<b>Email</b>	<a href="mailto:popia@mergence.co.za">popia@mergence.co.za</a>
<b>Postal address</b>	PO Box 8275, Roggebaai, 8012
<b>Business/ Street address</b>	2nd Floor, Cape Town Cruise Terminal, Duncan Road, V&A Waterfront, Cape Town, South Africa, 8001
<b>Phone number</b>	Tel +27 21 433 2960

#### 7. Changes to this Privacy Notice

Mergence may change this Privacy Notice at any time. Any change to this Privacy Notice will be displayed on our website. If you use the website after Mergence has displayed a change to this Privacy Notice, you will be deemed to have agreed to the change. However, such changes will not affect your rights under POPIA or diminish our responsibility and accountability in terms of the Act.



## 8. Questions

If you have any questions or concerns related to this statement and/or our practices, please send us an email (noted above) for the attention of the Information Officer.

Any additional information or concerns arising, can be raised with the Information Regulator, who can be contacted as shared below. However, please feel free to contact the Information Officers to discuss any questions or concerns you may have:

Website : <https://www.justice.gov.za/inforeg/>

Tel : 012 406 4818

Email : [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

## 9. Definition

*Your Personal Information is defined by the Protection of Personal Information Act (“POPIA”) as this:*

*“means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to— (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; (b) information relating to the education or the medical, financial, criminal or employment history of the person; (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; (d) the biometric information of the person; (e) the personal opinions, views or preferences of the person; (f) 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; (g) the views or opinions of another individual about the person; and (h) 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”.*