



Client Care

PRIVATE WEALTH MANAGEMENT

CLIENT CARE WEBSITE

CUSTOMER PRIVACY NOTICE

At Client Care and Private Wealth Management (PWM) we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently in compliance with the Protection of Personal Information Act.

This Notice explains how we obtain, use and disclose your personal information and aims to inform you of your rights and how to exercise them.

This Notice sets out:

- Who are we
- What information we collect and from where we collect it
- The purposes for which we use your information
- Our aim to provide ongoing financial services
- To whom we disclose your information
- How we safeguard your information
- Your rights to access and correction and deletion of information
- Changes to this Notice
- How to contact us
- The Information Regulator's contact details

WHO WE ARE

Client Care (Pty) Ltd (FSP No: 16088) | Reg no: 2004/019998/07 is a juristic representative of Private Wealth Management (Pty) Ltd (FSP No: 50787) | Reg no: 2019/470597/07. Client Care is authorised in terms of a written mandate to provide advice and render intermediary services on Private Wealth Management's behalf.

In this Notice, "Private Wealth Management", "PWM" or "we" refers to Private Wealth Management (PTY) Ltd and Client Care. Private Wealth Management (Pty) Ltd is a subsidiary of Old Mutual Wealth (Pty) Ltd and part of the Old Mutual Group.

THE INFORMATION WE COLLECT

We collect and process your personal information mainly to provide you with access to our services, to help us improve our offering to you and for certain other purposes explained below. In order for us to do this, you must provide us with the information that we request, failing which we cannot enter into a relationship with you or assist you.

When you provide us with information about third parties (for example your spouse, beneficiaries and/or dependents), we will process their personal information to assist in our planning process and to pursue their legitimate interest. We will furthermore process personal information for the purposes set out in this Notice. You warrant that when you give us personal information about third parties, this information is accurate and correct, and you have received their permission to share their personal information with us for the purposes set out in this Privacy Notice or any other related purposes. If you are giving consent for a person under 18 (a minor) you confirm that you are a competent person and that you have authority to give their consent on their behalf.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you apply for a service from us, when you submit enquiries to us or contact us.

We have a duty to take all reasonably practicable steps to ensure your personal information is complete,

accurate, not misleading and updated on a regular basis. To enable this, we will always try to obtain personal information from you directly, and we shall appreciate it if you would keep your personal information up to date and accurate. You can do so by contacting your Financial Planner or by emailing us at PIManagement@privatewealth.co.za. Where we are unable to do obtain personal information from you directly, we will make use of verifiable independent third party data sources.

Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information. This includes information about how you logged on and from our website, including your IP address, information about your visit, your device information and how you use our website. This will include the capture of your approximate location information - please see the [Cookies Policy](#) on our website for further information on this.

PURPOSE FOR WHICH WE USE YOUR INFORMATION

We will use your personal information only for the purposes for which it was collected or agreed with you, for example:

- To provide our services to you, to carry out the transaction you requested and to maintain our relationship
- To assess the completeness of documentation and the submission of claims
- To confirm and verify your identity, address and banking details
- To verify that you are an authorised user for security purposes
- For maintaining the accuracy of your personal information
- For operational purposes
- For the detection and prevention of fraud, crime, money laundering or other malpractice
- To trace you where we are not able to contact you
- To conduct market or customer satisfaction research or for statistical analysis
- For audit and record keeping purposes
- Social responsibility
- In connection with legal proceedings

We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law (for example to protect Client Care and PWM's interests).

We may also process your information, including personal and special personal information, to conduct sanction screening against all mandatory and non-mandatory sanctions lists, and we may communicate such personal information to local and international Regulatory Bodies as well as to other entities in the Old Mutual Group if you are matched to one of these sanctions lists.

You agree that we may obtain and share information about your creditworthiness or the creditworthiness of any payer on your policy with any credit bureau or credit provider's industry association or industry body. This includes information about credit history, financial history, judgments, default history and sharing of information for purposes of risk analysis, tracing and any related purposes.

ONGOING FINANCIAL SERVICES

Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed about other financial products and / or services which may be of particular interest to you.

You may opt out at any time if you don't want to receive any further communications of this nature.

You may also give and withdraw consent and tell us what your communication preferences are by contacting us at:

- PIManagement@privatewealth.co.za

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 these privacy terms.

We may share your personal information with:

- Third parties for the purposes listed above, for example credit reference and fraud prevention agencies, law enforcement agencies
- Other insurers to prevent fraudulent claims

- Other companies/entities/product providers, where appropriate, for the purposes listed above, or when we believe it will enhance the services and products we can offer to you, but only where you have not objected to such sharing

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes; or
- 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 unauthorised access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is 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 personal 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 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 the same level of protection as we are obliged to.

YOUR RIGHTS

We will take all reasonable steps to confirm your identity when you exercise your rights.

Access to information

You have the right to request a copy of the personal information we hold about you. To do this, contact your Financial Planner or email us at PIManagement@privatewealth.co.za and specify what information you would like.

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

Objection to processing

In certain cases, you have the right to object to the processing of your personal information. If you want to object, please contact your Financial Planner or email us at PIManagement@privatewealth.co.za.

Correction of your information

You have the right to ask us to update or correct your personal information. You may do this by contacting your Financial Planner or by emailing us at PIManagement@oldmutual.com.

Deletion of your information

You agree that we may keep your personal information until we destroy your information based on PWM's deletion / destruction standards. You have the right to ask for deletion or destruction of your personal information – we will do that unless the law requires us to keep it or if we need it for legitimate business purposes. You may do this by contacting us at PIManagement@privatewealth.co.za.

Automated decision making

You agree that we may process your personal information by using automated means (without human intervention in the decision making process) to make a decision about you or your application for any product or service you may query the decision made about you.



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TRANSFERS OF PERSONAL INFORMATION

The personal information we process may be used, stored and/or accessed by staff working for us, other members of Client Care, PWM or third party partners providing services to us, or performing services on our behalf. Further details on to whom your personal information may be disclosed are set out above.

When we contract with third parties, we require that they have appropriate security, privacy and confidentiality measures in place to ensure that personal information is kept secure.

If we work with third parties in countries outside the EU, we ensure that these are countries that the European Commission has confirmed have an adequate level of protection for personal information, or the third party receiving the personal information has provided adequate safeguards and agrees to treat your information with the same level of protection as we would and as is required by applicable law.

CHANGES TO THIS NOTICE

Please note that we may amend this Notice from time to time. Please check our website (www.clientcare.co.za) periodically to inform yourself of any changes.

HOW TO CONTACT US

If you have questions about this Notice or believe we have not adhered to it, or need further information about our privacy practices, please contact us at PIManagement@privatewealth.co.za.

INFORMATION REGULATOR

You have the right to complain to the Information Regulator, whose contact details are:

<http://www.justice.gov.za/infoereg/index.html>

General enquiries: enquiries@infoeregulator.org.za

Complaints: POPIAComplaints@infoeregulator.org.za

Date: January 2026