



# PRIVACY POLICY

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## 1. WHO IS CAPTA?

For the purposes of this policy, when we refer to CAPTA, it means CAPTA Holdings (Pty) Ltd and all its subsidiaries and associated companies. This is a group policy for the below entities:

- CAPTA WEALTH (Pty) Ltd (FSP 43071)
- CAPTA Forex (Pty) Ltd (FSP 48120)
- CAPTA Fiduciary (Pty) Ltd (not an FSP)
- CAPTA Invest (Pty) Ltd (FSP 43436)
- Pin Oak Capital (Pty) Ltd (FSP 51368)

## 2. PRIVACY

CAPTA respects your privacy and is committed to keeping your information confidential.

CAPTA is committed to maintaining this integrity and trust by complying with the Law. This policy forms part of the existing CAPTA Compliance & Governance framework.

Data protection requires of CAPTA (as the 'responsible party') to inform its clients (as the 'data subjects') about how their personal information is processed, disclosed, protected, maintained, and destroyed.

Your personal information is used appropriately, transparently, securely and in accordance with the law.

## 3. PERSONAL INFORMATION

### 3.1. Information we collect and use:

CAPTA only collects and processes personal information relative to the products and services it provides. The type of information will depend on the purpose for which it is collected and will be processed for that purpose only.

When collecting information from you, we enter into an agreement (mandate) with you, which in turn authorizing us to provide you with our products and services.

Examples of personal information that CAPTA collects:

- names, surnames, and identification numbers
- residential and work addresses and postal codes
- telephone and mobile numbers, fax numbers and email addresses

- citizenship, occupation details, income tax reference numbers and bankers.
- any other information required by us, our suppliers and insurers to provide clients with an accurate analysis of their investment or insurance needs.

CAPTA needs to collect personal or other information:

- For underwriting purposes;
- Assessing and processing claims;
- Conducting credit reference searches or verification;
- Confirming, verifying and updating an individual's identity;
- For credit assessment and credit management;
- For purposes of claims history;
- 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;
- Follow an individual's instructions;
- Inform an individual of services;
- Make sure the FSPs business suits the individual's needs;
- providing products or services to clients and executing instructions received;

If you do not want CAPTA to continue using or processing your personal information, you have the right to object to this, kindly send an email to: [david@captawealth.com](mailto:david@captawealth.com)

### 3.2. Website usage information:

You can visit our websites without inputting any personal information. However, if you use our websites, you may, voluntarily provide your personal information. We may record how and when you use our website, products and services. We do not make use of cookies (text files with small pieces of data that are used to identify your computer as you use a computer network).

If you communicate with CAPTA by electronic means (email, SMS, whatsapp etc), you consent to receiving communications electronically and agree that all other communications transmitted by



electronic means satisfy the legal requirement that such communication should be in writing.

### 3.3. Access and correction of your information:

You may request a copy of the personal information we have on record for you.

You may update or correct any personal information we hold of you.

It is your responsibility to keep your personal information held with us up to date.

Before making any changes or providing you with any personal information we will first need to verify your identity.

To request, update, correct your personal information, you may simply email: [david@captawealth.com](mailto:david@captawealth.com) or contact your wealth adviser.

### 3.4. Request access to personal information by third parties:

If you are a third party and would like to request access to personal information held by CAPTA you would need to follow the procedures laid out in the Promotion of Access to Information Act, 2000 (PAIA) which sets out the request for information procedures and circumstances where such access to information may be refused.

If you wish to access the CAPTA PAIA Manual with the prescribed request form and fees, please email: [david@captawealth.com](mailto:david@captawealth.com)

### 3.5. Retaining of your personal information:

CAPTA retains your information for purposes of investment transactions, processing and administration, to communicate directly with you.

CAPTA will not keep your records for longer than is necessary for achieving the purpose for which the information was collected or processed.

You can request CAPTA to delete or destruct or remove or erase your personal information.

Note that this right is limited because CAPTA is required to retain your personal information because of legislation, in exercise or defend a legal claim, your consent, for historical, statistical or scientific purposes.



### 3.6. Information sharing:

All personal information provided to CAPTA is kept strictly confidential.

However, CAPTA may engage with third parties to provide support services and products. Third Parties are obliged to respect the confidentiality of any personal information held by CAPTA. A

Service Level agreement is in place with all third parties to ensure adherence to all Privacy and Confidentiality legislation and policies.

Sharing of personal information within the CAPTA Group helps us to provide you with consolidated reporting and allows us to make sure that we meet your financial needs with our quality range of products and services.

We may disclose your personal information in circumstances where it is required by law (within the Republic or outside), to protect your and our legitimate interests or that of a third party and if you have provided consent to CAPTA for such disclosure.

### 3.7. Security of information:

CAPTA takes all the required measures to protect your personal information from unauthorised or unlawful access.

CAPTA cannot guarantee the security of any information you transmit to us electronically.

CAPTA Forex (Pty) Ltd stores your personal information at our hosting provider who is located in the UK (which has substantially similar privacy legislation to South Africa). If you would like to view their privacy policy, kindly email [david@captawealth.com](mailto:david@captawealth.com)

The rest of CAPTA uses Google Drive to store and safeguard your personal information - you may access their Privacy Policy at <https://policies.google.com/privacy?hl=en>

Personal information shared with third parties is secure because we have a Service Level agreement in place with all our third parties to ensure adherence to all Privacy and Confidentiality legislation and policies.

## 4. CONTACT INFORMATION

If you have any privacy complaints, compliments or comments or any concerns about your personal information and how we process it, kindly send an email to : [david@captawealth.com](mailto:david@captawealth.com) Or contact your Wealth Manager or Adviser.