

## Personal Information “Discretionary Investment Advisors”

The Protection of Personal Information (PoPI) Act applies to the processing of your personal information. The following sets out how, when and why MiPlan as the responsible party has your personal information, how it is used and what your rights are should you not be in accord. Please note that if the information we hold is that of a minor, we require the accordance of the parent/legal guardian/representative (to whom this is then addressed) as well as to validate a request for the withdrawal of consent for the use of personal information.

**Use of Information:** Your personal information is used where necessary to provide our services in terms of our discretionary model agreement with you, the advisor, to the discretionary investment mandated clients in our model portfolios. We use your personal information for the following purposes:

- to fulfill our contract with you in terms of our agreement and the client mandate;
- to verify and confirm your identity; and conduct checks as required by legislation\*;
- to communicate with you;
- to comply with legal obligations imposed by the relevant regulatory frameworks\*.

**Collection:** We will collect the following (but not limited to) data directly and/or indirectly from you, the advisor, or any other appointed party:

- your title, full name, your contact details and that of your representatives including;
- email address and telephone/cellphone number;
- proof of residential address;
- proof of identification, registration, entity verification documents;
- FSP details of the brokerage and broker codes;
- discretionary mandated client information linked to these codes (see MiPlan Discretionary Mandated Client Personal Information Accord);
- client number, investment values, transactions and other financial information.

For MiPlan to fulfil its contract with you, it is mandatory that the personal information be provided to enable us to carry out our mandated duties and services. Should you fail to provide MiPlan with the information, we will not be able to offer our services to you and your clients and/or will be forced to terminate our contract with you and cease to offer such contracted services to your clients .

**Sharing of Information:** The personal information provided to MiPlan is kept strictly confidential and MiPlan will not rent, trade or sell your personal information. We will, however, disclose or report personal information if and when required to do so by law or by any authorised regulatory body or in the fulfilment of our mandate and agreements.

**Your rights:** You have the right to (after having provided adequate proof of identity):

- access and rectify the information collected;
- object to the processing of personal information;
- request a responsible party to confirm, free of charge, whether or not MiPlan holds your personal information;
- request from MiPlan as the responsible party, the record or a description of the personal information about you, the data subject, held by the responsible party, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information—
  - i. within a reasonable time;
  - ii. at a prescribed fee, if any;
  - iii. in a reasonable manner and format that is understandable;
- to lodge a complaint to the Information Regulator. The contact details of the information regulator are as follows:

The Information Regulator (South Africa):

Website: [www.justice.gov.za/infogov](http://www.justice.gov.za/infogov) Email Address: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za) | [infogov@justice.gov.za](mailto:infogov@justice.gov.za)

Address: 33 Hoofd Street, Forum III, 3rd Floor Braampark, P.O Box 31533, Braamfontein, Johannesburg, 2017.

**Therefore, this serves to confirm your accordance** that MiPlan may (directly, indirectly) collect, procure, obtain, receive, process, outsource, store, retain, share and disclose such information as required by the prevailing laws and MiPlan's Protection of Personal Information Policy. Alternatively, a copy may be requested by emailing MiPlan at [info@miplan.co.za](mailto:info@miplan.co.za).

\*regulatory frameworks: Financial Intelligence Act (“FIC Act”); Financial Advisor and Intermediary Services Act (“FAIS Act”); Collective Investment Schemes Control Act (“CISCA”); Protection of Personal Information Act (“PoPI Act”); Consumer Protection Act; Electronic Communications and Transactions Act; Promotion of Access to Information Act (“PAIA”) and Income Tax Act or any such applicable acts.