Privacy Policy

Effective Date: September 2026 | Version: 2.1 (merged draft)

Introduction

For the purposes of this policy, 'SecureWealth', 'we', 'us' or 'our' means SecureWealth (Pty) Ltd ("SecureWealth"), an authorised Financial Services Provider, FSP No. 6148, and its associated companies, being SecureConsult (Pty) Ltd, Secure Fiduciary Services (Pty) Ltd t/a SecureTrust, and Rook Properties (Pty) Ltd.

SecureWealth respects the privacy and confidentiality of personal information entrusted to us by our clients, prospective clients, employees, representatives, directors, service providers and other people with whom we interact. This Privacy Policy explains how SecureWealth collects, uses, stores, protects, shares and otherwise processes personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA"), which establishes conditions for the lawful processing of personal information and provides data subjects with rights and remedies relating to their personal information, together with other applicable legislation.

This Privacy Policy should be read together with SecureWealth's other applicable policies and procedures, including its PAIA Manual.

Responsible Party

For purposes of POPIA, SecureWealth (Pty) Ltd is the responsible party in respect of personal information processed in connection with its business activities.

SecureWealth (Pty) Ltd | FSP No.: 6148 | Registration No.: 2001/022689/07

Telephone: +27 (0)21 852 2435 | Email: info@securewealth.co.za | Website: www.securewealth.co.za

Postal Address: PO Box 2909, Somerset West, 7129, South Africa

Our Information Officer

SecureWealth has appointed an Information Officer and Deputy Information Officer to oversee compliance with POPIA and applicable information-access legislation. Requests, questions or complaints relating to the processing of personal information may be directed to the Information Officer using the details below.

Information Officer: Maryka Smit | Registration No. 2025-003362

Deputy Information Officer: Matthew Carruthers

Email: info@securewealth.co.za | Telephone: +27 (0)21 852 2435

What is Personal Information?

"Personal information" includes information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person. Depending on our relationship with you, this can include: name and surname; identity or passport information; date of birth; contact and address details; marital and family information; employment and occupation information; financial, investment and banking information; income, expenditure, assets and liabilities; tax information; insurance, retirement and beneficiary information; correspondence and communications with us; financial planning and advice records; application forms and supporting documents; and information relating to representatives, directors, employees and service providers.

Where required in connection with insurance or other financial services, we may also process special personal information, including health information, subject to the requirements of POPIA.

Whose Information Do We Process?

Depending on our relationship with the relevant person, SecureWealth may process personal information relating to existing and prospective clients; beneficiaries and dependants; spouses or partners; authorised representatives and people holding powers of attorney; directors, representatives and employees (including prospective employees); service providers and their staff; product providers and other business contacts; and other people whose information is reasonably required in connection with our services or our legal and regulatory obligations. Where you provide us with another person's information, please ensure, where reasonably possible, that they are aware their information has been provided to us and for what purpose.

How We Collect Personal Information

We may collect personal information directly from you; from forms and documents you complete; during meetings, calls or electronic communications; through our website; from your authorised representatives; from product providers and financial institutions where necessary to provide or administer services; from publicly available sources where lawful; from third-party service providers where necessary and lawful; and where required or permitted by law. We endeavour to collect information directly from the data subject where appropriate, though POPIA permits collection from other sources in certain circumstances.

Purposes for Which We Process Personal Information

SecureWealth processes personal information only for specific, explicitly defined and lawful purposes connected with our business activities, including:

Providing financial services

To provide financial advice, intermediary services and related services requested by clients or prospective clients.

Financial products and investments

To facilitate, implement, administer and service investments, retirement products, life insurance and other financial products. This may include communicating with relevant product providers, including Allan Gray, Momentum and Investec, where necessary to provide or administer services.

Regulatory and legal obligations

To comply with applicable legislation, regulations and regulatory requirements applicable to financial services providers.

FICA and related requirements

To identify and verify clients and other persons where required, and to comply with anti-money-laundering, counter-terrorist financing and related requirements.

Client administration

To maintain accurate client records, process instructions, communicate with clients, manage accounts and provide ongoing services.

Risk management and compliance

To monitor, manage and document risks, compliance, complaints, disputes, audits and regulatory matters.

Communication

To communicate with clients and other relevant people regarding services, transactions, instructions, appointments and other matters reasonably connected with our relationship.

Security

To protect our clients, employees, business, systems, records and property, and to prevent fraud, misuse and unauthorised access.

Legal rights
To establish, exercise or defend legal rights and to deal with disputes, claims or legal proceedings.

Business administration
To manage our employees, representatives, directors, service providers, accounting, auditing, IT and other business functions.

Lawful Basis for Processing

SecureWealth does not rely on consent as the sole basis for processing personal information. Depending on the circumstances, we may process personal information because: you have consented; processing is necessary to perform a contract with you, or to take steps at your request before entering into one; processing is necessary to comply with a legal obligation; processing protects a legitimate interest of yours; processing is necessary to pursue SecureWealth's legitimate interests, or those of a third party to whom information is supplied, where permitted by law; or processing is otherwise permitted by applicable legislation. Where we rely on consent, it will be obtained in accordance with POPIA. Where processing is required by law or necessary to provide a requested financial service, declining to provide the required information may affect our ability to provide that service.

Accuracy of Personal Information

SecureWealth takes reasonable steps to ensure personal information in our possession is accurate, complete, not misleading, and updated where necessary. You are encouraged to inform us when your personal information changes. Requests to update or correct personal information may be sent to info@securewealth.co.za.

Sharing of Personal Information

SecureWealth treats personal information as confidential and does not sell or trade it. Where lawful and reasonably necessary, personal information may be disclosed to or processed by: financial product providers, investment managers and platforms; insurers and administrators; persons you have authorised, including your duly appointed power of attorney; attorneys and other professional advisers; auditors and compliance professionals; IT and cloud-service providers; other service providers assisting us in providing our services; and regulatory, governmental or law-enforcement authorities where legally required or permitted. For example, we may process or disclose relevant information to Allan Gray in relation to client investments, Momentum in relation to life insurance business, and Investec in relation to share portfolio services. We only disclose what is reasonably necessary for the relevant purpose, and take reasonable steps to ensure appropriate confidentiality and security obligations apply.

Operators and Third-Party Service Providers

Where a third party processes personal information on our behalf and acts as an “operator” as defined in POPIA, SecureWealth will ensure – through a written agreement, as required by section 21 of POPIA – that the operator: processes personal information only with our knowledge or authorisation; treats it as confidential; applies security safeguards at least equivalent to our own; does not process it for any unauthorised purpose; notifies us immediately if it has reasonable grounds to believe personal information has been accessed or acquired by an unauthorised person; and otherwise complies with applicable contractual and legal requirements. SecureWealth uses Dropbox and other technology service providers for the storage, management and processing of business information, including client files, correspondence and company information, and takes reasonable steps to ensure appropriate contractual, technical and organisational safeguards apply to all such providers.

Special Personal Information

Certain categories of personal information receive additional protection under POPIA. Where relevant to the financial services being provided, SecureWealth may process special personal information, including health information, for purposes such as insurance applications, underwriting or claims, where such processing is lawful and necessary – for example, where health information is requested by an insurer in connection with an insurance application. We will process such information only where permitted by law, will take appropriate measures to protect it, and will obtain your consent where consent is required before processing or disclosing it.

Information Security

SecureWealth takes reasonable technical and organisational measures to protect personal information against loss, damage, unauthorised access or disclosure, unlawful processing, accidental destruction, and other unauthorised use. These measures may include password protection and access controls; encryption and secure electronic communications; secure cloud storage; controlled access to client files; physical security measures including onsite fireproof and waterproof storage; secure document storage and backup procedures; security software and system controls; confidentiality obligations; staff awareness and training; and periodic review of our security measures. Access to personal information is restricted to people who require it for legitimate business, service or regulatory purposes. SecureWealth cannot, however, guarantee the security of information you transmit to us electronically, and you do so at your own risk.

Security Compromises and Data Breaches

SecureWealth maintains procedures for identifying, assessing and responding to suspected or actual security compromises involving personal information. If we have reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, we will take the steps required by section 22 of POPIA, including assessing the nature and extent of the compromise and notifying the Information Regulator and affected data subjects where required by law. We will also take reasonable steps to contain the incident, investigate its cause, mitigate potential harm, and prevent recurrence.

Retention of Personal Information

SecureWealth will not retain personal information for longer than necessary for the purpose for which it was collected, unless retention is required or authorised by law, necessary for contractual, regulatory or compliance purposes, required to establish, exercise or defend legal rights, or otherwise permitted by law. As a financial services provider, certain records must be retained for prescribed periods under applicable financial-services, tax and anti-money-laundering legislation – currently a minimum of five years from the end of our relationship with you or the transaction concerned under FICA and FAIS, unless a longer period applies. Once information is no longer required, we will take reasonable steps to securely delete, destroy or de-identify it, subject to these retention requirements.

Your Rights as a Data Subject

Subject to the limitations and requirements of POPIA, you may have the right to: request confirmation of whether we hold personal information about you; request access to it; request correction or updating of inaccurate or incomplete information; request deletion or destruction of information where legally permissible; object, on reasonable grounds, to certain processing; object to direct marketing; withdraw consent where processing is based on consent, without affecting the lawfulness of processing carried out before withdrawal; request restriction of processing where applicable; and lodge a complaint about how we have processed your personal information (see 'Complaints' below). Requests should be submitted in writing to our Information Officer at info@securewealth.co.za. We may require sufficient information to verify your identity and may apply any lawful requirements, procedures or fees applicable to the request.

Direct Marketing

SecureWealth does not currently conduct direct marketing of products or services through unsolicited electronic communications. Communications necessary to provide services to existing clients, process transactions, administer investments or insurance, respond to enquiries, fulfil instructions, or comply with legal and regulatory obligations are not regarded as promotional direct marketing. Should SecureWealth conduct direct marketing in future, it will do so in accordance with POPIA, including any applicable consent and opt-out requirements. You may object to direct marketing communications, and unsubscribe from any electronic communication, at any time by contacting info@securewealth.co.za.

Website and Cookies

You may visit the SecureWealth website without necessarily providing personal information. Where information is submitted through our website, it will be processed for the purpose for which it was provided and in accordance with this policy. Our website may use cookies or similar tracking technologies for functionality, security, analytics or other legitimate purposes; these do not identify you personally unless you provide information directly (for example, via a contact form). You can disable cookies through your browser settings, though this may affect some website functionality.

Electronic Communications

SecureWealth may communicate with clients and other relevant people by email, telephone and other electronic means where reasonably necessary to provide services, communicate regarding transactions, respond to enquiries, administer client relationships, or comply with applicable obligations. Electronic communications carry inherent security risks; we take reasonable measures to protect information sent electronically, but no transmission or storage system can be guaranteed completely secure. Where appropriate, we may use secure portals or password-protected documents for sensitive information.

Children's Personal Information

SecureWealth does not knowingly collect or process personal information relating to children, except where permitted by POPIA and other applicable legislation and where appropriate consent or authorisation has been obtained. Where a child is a beneficiary, dependant, insured person, or otherwise relevant to a financial service, we will process the child's information only to the extent reasonably necessary and permitted by law.

Cross-Border Transfers

SecureWealth may use product providers, investment platforms, or technology and cloud-service providers (such as Dropbox) that involve the storage or processing of personal information outside South Africa. Before transferring personal information outside the Republic, we take reasonable steps to ensure that one of the following conditions under section 72 of POPIA is satisfied: the recipient is subject to a law, binding corporate rules, or a binding contractual agreement which effectively upholds principles for the reasonable processing of personal information that are substantially similar to POPIA, including in respect of onward transfers; or you have consented to the transfer; or the transfer is necessary for the performance of a contract between you and SecureWealth, or is for your benefit and it is not reasonably practicable to obtain your consent but you would be likely to give it if asked. Where we rely on a written agreement with a service provider to satisfy this requirement, that agreement imposes safeguards and onward-transfer restrictions consistent with POPIA.

Confidentiality

All directors, representatives, employees and other people authorised to process personal information on behalf of SecureWealth are required to maintain its confidentiality and to use it only for authorised purposes. These confidentiality obligations may continue after a person's employment, appointment or relationship with SecureWealth ends, subject to applicable law.

Accountability and Compliance

SecureWealth is committed to complying with the conditions for lawful processing in POPIA. We take reasonable steps to: establish appropriate privacy and information-security practices; identify and manage reasonably foreseeable risks; limit access to personal information; maintain appropriate records and safeguards; review our privacy and security practices periodically; provide appropriate awareness and guidance to people processing personal information on our behalf; and respond appropriately to privacy complaints, requests and security incidents.

PAIA

SecureWealth recognises that the Promotion of Access to Information Act 2 of 2000 ("PAIA"), as amended, operates alongside POPIA. We maintain a PAIA Manual dealing with access to records and information held by the company. Requests for access to information will be handled in accordance with PAIA and POPIA, as applicable, and this Privacy Policy should be read together with our PAIA Manual.

Complaints

If you believe SecureWealth has processed your personal information unlawfully, or has otherwise failed to comply with this policy or POPIA, please contact our Information Officer first, so that we can investigate and attempt to resolve the matter:

Information Officer: Maryka Smit | Email: info@securewealth.co.za | Telephone: +27 (0)21 852 2435

If you are not satisfied with how your complaint has been handled, you may lodge a complaint with the Information Regulator of South Africa:

- Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
- Postal address: P.O. Box 31533, Braamfontein, Johannesburg, 2017
- Email: enquiries@inforegulator.org.za
- Telephone: 010 023 5200 (Toll-free: 0800 017 160)
- Website: www.inforegulator.org.za

Changes to This Privacy Policy

SecureWealth may amend this policy from time to time to reflect changes in legislation, regulatory requirements, technology, business practices or the services we provide. The latest version will be made available on the SecureWealth website or by contacting us directly. The date and version number at the top of this policy indicate when it was last reviewed or updated.

Contact Details

For any questions, requests or concerns relating to this Privacy Policy or our processing of personal information, please contact: