



Consent to Process Personal Information

1. Background

This document serves to explain how Trive South Africa (Pty) Ltd (hereinafter referred to as “**Trive SA**”) acquires, uses, retains and/or discloses our clients’ personal information, as is required by the Protection of Personal Information Act, 4 of 2013 (hereinafter referred to as “**POPI**”).

At Trive SA, we are committed to protecting your privacy and the integrity of your personal information by dealing with same in a lawful, legitimate and responsible manner.

2. What is Personal Information?

In terms of POPI, “**Personal Information**” is defined as information relating to an identifiable, living, natural person, and where is applicable, an identifiable, existing juristic person, including, but not limited to:

- 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;
- Information relating to the education or the medical, financial, criminal or employment history of the person;
- Any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- The biometric information of the person;
- The personal opinions, views or preferences of the person;
- 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;
- The views or opinions of another individual about the person; and
- 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.

3. Purpose of Collecting your Personal Information

As a registered Financial Services Provider, your and your colleagues' personal information may be collected by Trive SA for the following reasons, some of which may be mandatory:

- To process Know-Your-Client (hereinafter referred to as “**KYC**”) information and/or other information required in terms of the Financial Intelligence Centre Act, 38 of 2001 (hereinafter referred to as “**FICA**”);
- To administer and implement any agreements entered into and signed by yourself and Trive SA;

- To provide you with access to our products, services and platforms, including but not limited to analysis and/or intermediary services as provided in terms of your agreement with us;
- To monitor and/or analyse your conduct relating to such intermediary services for fraud, compliance and other risk-related purposes;
- To develop new products and/or services;
- To help us improve our offerings to you and our client base at large;
- To confirm and verify your identity and/or to verify that you are an authorised user for security purposes;
- For the detection and prevention of fraud, money laundering, terrorist financing, proliferation financing, and/or any other crimes or malpractices;
- To conduct market and/or customer satisfaction research or for purposes of statistical analysis;
- For audit and/or record keeping purposes;
- For any purposes in connection with legal proceedings; and
- To comply with any legal and/or regulatory requirements and/or industry codes to which Trive SA subscribes or which apply to us, or when it is otherwise allowed by law.

The type of information we collect shall depend on the purpose for which it is collected and/or used. We shall only collect information that we require for a particular purpose and shall not collect more information than is necessary. In some instances, we shall inform you what specific information you are required to provide to us and what information is optional.

Primarily, information shall be collected directly from you as the Data Subject, however, we may also collect certain information about you from other sources, with or without your consent. For example, Trive SA may collect certain information about you or your colleagues from sources which are publicly available such as global compliance databases.

Website usage information is collected using "**Cookies**" which allows us to collect standard internet visitor usage information.

4. Disclosure of your Personal Information

We confirm that your personal information is at all times kept strictly confidential, however, in order to ensure that the purpose of the collection is properly complied with, we may under certain circumstances lawfully disclose such information to the following third parties:

- Service providers;
- Subcontractors;
- Agents;
- Trive authorised personnel (including those in subsidiary companies);
- Courts of Law;
- Governmental bodies; and
- Industry Regulators.

Trive SA may also disclose your personal information, where we have a duty and/or a right to do so in terms of any law and/or industry codes, or where we believe such disclosure may be necessary to protect our rights.

We confirm that some of the third parties mentioned above may occasionally be located outside the Republic of South Africa.

Trive SA has agreements and security measures in place to ensure that all third parties to whom your personal information is disclosed comply with the terms and provisions set out in the POPI Act. We ensure that any such third parties fully understand the duties and obligations that apply to them in relation to retaining the privacy and integrity of your personal information, and all such third parties are made to sign a POPI Declaration.

5. Protecting your Personal Information

In terms of the POPI Act, Trive SA is obliged to implement certain measures and strategies to ensure the protection of our clients' personal information, and in terms of which unauthorised access and use of such information is deterred. Our information security policies and procedures, which are reviewed on an ongoing basis, include, but are not limited to, the following:

- 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; and
- Investigating and reacting to security incidents.

When we contract with third parties, we ensure that we impose appropriate security, privacy and confidentiality obligations on such third parties to ensure that any personal information for which we remain responsible, is adequately secured. Trive SA will ensure that any third party to whom we pass your personal information agrees and undertakes to treat such information with the same standards as are applicable to us, as the Data Collector. This includes instances in which we may be required to transfer your personal information to another country for processing and/or storage.

6. Access to/Correction of your Personal Information

You may contact our offices at any time, using the details set out herein below, to enquire as to what personal information of yours we currently hold. Such information shall be made available to you upon request and after reasonable satisfaction that you have confirmed your identity to us.

Information Officer: **Travis Robson**

Telephone Number: **071 307 5394**

Postal Address: **4 Karen Street Office Park,
Bryanston,
Sandton,
2191**

Physical Address: **Same as above**

Email address: **travis.robson@trive.com**

Trive SA is obliged to store information that is accurate and updated. You may contact our offices at any time, using the above-mentioned details, in order to update, correct, amend or delete any of your personal information that we currently hold. We confirm that we will take all reasonable steps to confirm your identity before making any such changes to your personal information.

7. Complaints

You have the right to address any complaints that you may have regarding the handling of your personal information through our normal Complaints channels, which can be found on our website – www.trive.co.za.

Alternatively, you may at any time contact the Information Regulator, the details of which can be found herein below:

The Information Regulator (South Africa)

SALU Building

316 Thabo Sehume Street

0001 PRETORIA

Tel: 012 406 4818

Fax: 086 500 3351

infoereg@justice.gov.za

8. Amendments

Kindly note that this Notice may be amended from time to time. Please ensure that you check our website periodically in order to stay abreast of any changes relating thereto.

9. Declaration and Informed Consent

I, the undersigned, hereby declare that all personal information supplied to Trive SA for the purposes of processing and administering any intermediary services and for any legal and/or operational reasons related thereto is accurate, up-to-date, not misleading and complete in all respects.

I undertake to immediately inform Trive SA of any changes to my personal information should any such changes take place.

I hereby permit Trive SA to process my personal information, as provided, and acknowledge that I understand the purposes for which such information is required as well as all terms and provisions contained in this Notice.

Signed and dated at _____ on this ____ day of _____ 20____.

Client Signature