



## **PRIVACY NOTICE**

### **Introduction**

The Smart Group of Companies recognises the protection of personal information (privacy) as an important responsibility and as such, this Privacy Notice aims to describe our privacy practices including the ways in which we collect, use, disclose and protect your personal information.

This Privacy Notice applies to all our services, products and any platforms we may use. When we refer to platforms, we refer to websites, mobile sites or applications, social media platforms or any other technology or mechanism you may use to interact with us.

This Privacy Notice will be reviewed periodically and may change from time to time.

### **What Personal Information we may collect:**

The types of information that we may collect and process will include (but is not limited to):

- Your full names
- Identity or passport numbers
- E-mail, physical and postal addresses and contact information
- Your employment history and occupation
- Your health
- Your education
- Your gender, race, marital status, language, disabilities

We will only collect information which is necessary for our legitimate business interests or required in terms of the law.

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62 Old Main Road, Kloof, KwaZulu Natal

Registration No.: 2014/032363/07

**Directors**

S Jhavary, WM Sutherland, PD Mosole, CX Mosole,  
DR Harding

This information may be collected when you purchase a product through us, request assistance with a service, fill in a form (paper or electronic), when you contact us telephonically and provide the information directly.

### **How and when will we process your personal information?**

Your personal information may only be processed by us for the purpose for which it was provided.

This will include:

- When you require comprehensive financial planning, estate planning, fiduciary services and advice
- Fulfilment of our contractual and legal obligations to you
- To maintain our relationship with you
- To market products, services or other offerings
- To conduct verification and reference checks where required
- For audit and record keeping purposes
- To conduct statistical or market related research
- As required by legislation, regulation or industry codes

### **When will we share your information?**

We will only share your information with approved third-party providers where necessary for the purpose agreed to by yourself or to government or law enforcement agencies where the law requires that we disclose it.

### **How do we protect your personal information?**

We make use of reputable service providers to ensure that care is taken to protect your information and that we can restore the data should there be a technical problem. Client information is kept on our CRM tool as well as on a cloud-based server.

### **Communicating with you**

When we communicate with you, we will do this by electronic mail wherever possible, and where this is not possible by courier services and by using the South African postal service.

We will take reasonable measures to ensure the security of the documents sent to you, but we cannot be held liable for any unauthorised access or disclosure of your information once it has been sent.

## **Keeping your information**

You acknowledge that your information will be stored by us. We will only process and retain your information for as long as the purpose for which we collected it continues to be relevant, or we are required to comply with legal or regulatory requirements or to protect our legal interests. This may mean that your information is retained for longer than the minimum time set out by the law.

## **What are your rights with regards your personal information?**

You have the right to request that we correct, destroy or delete any personal information that we processed for you. This would be information that is inaccurate, irrelevant, out of date, incomplete, misleading, obtained without your permission or that we are no longer authorised to retain.

You can withdraw your permission for us to use your information at any time provided that it does not affect the processing of your personal information:

- Prior to the withdrawal of consent
- If that processing is an obligation imposed by any law
- As required to finalise the performance of a contract in which you are a party
- As required to protect yours, ours or a third party's legitimate interest.

You can object to the processing of your personal information at any time on reasonable grounds:

- If the information is not required to pursue your legitimate interests
- If the information is being used for Direct Marketing or unsolicited electronic communication, without your consent or by an unknown third party.

You have the right to submit a complaint to the Information Regulator regarding an alleged interference with the protection of your personal information.

You have the right to institute civil proceedings regarding an alleged interference with the protection of your personal information processed in accordance with this policy.

Complaints can be addressed to:

The Information Regulator  
62 Old Main Road, Kloof, Kwa Zulu Natal, 3610  
PO Box 1642, Wandsbeck, Westville, 3631  
Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za).

### **Our Contact Information**

If you have any questions or concerns with regards to this Privacy Policy, please contact our Information Officer Shenaz Jhavary on email [shenaz@smarted.co.za](mailto:shenaz@smarted.co.za).