

## PRIVACY POLICY

The purpose of this privacy policy is to inform you of your rights as regarding privacy when your information is processed by FAIS Exchange, owned by Plumb Line Risk Alignment (Pty) Ltd. This policy serves to inform you of how personal information is collected, processed and treated by FAIS Exchange (“Us”, “We”, “Our”). Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it. By visiting [http:// www.fais-exchange.co.za](http://www.fais-exchange.co.za), or any of our other websites (“our site”), or by utilising our services you are accepting and consenting to the practices described in this policy.

Reference to “consent”, “your consent” or “your explicit consent” shall include the clicking of “application” or “submit” button or “I agree” button on our site.

### Information we may collect

- Information provided by you:
  - 1) During the registration and login into the FAIS Exchange.
  - 2) When using our “Contact” functionality on our website.
  - 3) By telephoning FAIS Exchange and providing personal information requested by personnel.
  - 4) When subscribing to one of our services.
  - 5) Information that we ma
  - 6) When making contact through our professional media forum (where available).
  - 7) When you complete a FAIS Exchange survey.
  - 8) When you report any problem to FAIS Exchange.
- Personal Information collected by us about you via our website:
  - 1) Technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
  - 2) Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); services/ products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- Personal Information received from other sources:
 

We may receive information about you when you use any of the other services we provide or where you have authorised us to collect information from selected third parties, i.e. FSCA. Any information gathered in this manner will carry your consent as we would have informed you that, when we collected that information, it may be shared internally and/ or be combined with other information collected on our site.

### Cookies

- **What is a cookie?:** A ‘cookie’ is a very small piece of information in the form of a text file placed on your computer hard drive by the various websites that you visit.
- **Why we use Cookies?** Cookies may be used by us to understand the users of our site better. Cookies allow us to understand who has seen which pages and advertisements, to determine how frequently particular pages are visited and to determine the most popular areas of our site. We use ‘cookies’ to make accessing the website more convenient, so you don’t need to remember your username / email address. This information will allow us to welcome you by name, and over time to personalise our website content to reflect your preferences. For security reasons, you will still need to enter your password.
- **How cookies can be used?** ‘Cookies’ can be used to store basic information, like your user identification. They do not store password or credit card information.
- **Please remember:** Cookies do not contain personal information such as your home address, telephone number or credit card details, however, personal information that we store about you as explained above may be linked to the information stored in and obtained from cookies. We will not exchange cookies with any third party websites or external data suppliers. We will only keep cookies for the duration of your visit to our site.

### Uses made of the information

We use *the information* held about you in the following ways:

- **The Information you give to us.** We will use the information to:
  - carry out our obligations (whether day-to-day administration or maintenance) arising from any contracts entered into between you and us or your employer and to provide you with the information and services that you request from us or a third party;
  - provide your employer or the party authorising you to access the FAIS-EXCHANGE with results from your use of the FAIS-EXCHANGE;
  - provide you with information about other services and/ or products we offer that are similar to those that you have already acquired or enquired about;
  - provide you with information about products and/ or services we feel may be of interest to you as a registered user of FAIS-EXCHANGE. If you do not want us to use your information in this way, then kindly contact us in writing. Except as stated under this policy, we will not share your information with any third party;

- to confirm and verify your identity or your status as registered advisor or to verify that you are an authorised user for security purposes (this may include facial recognition (subject to your consent));
  - notify you about changes to our Services;
  - ensure that Content from our site is presented in the most effective manner for you and for your computer;
  - deal with enquiries and complaints made by or about you relating to our site or other services you use.
- **Information we collect about you.** We will use the information:
    - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
    - to offer you a more consistent and personalised experience in your interactions with FAIS Exchange;
    - to inform your employer or party authorising you to access the FAIS-EXCHANGE about your use of the FAIS-EXCHANGE;
    - provide the Product Provider the results from your use of the FAIS-EXCHANGE for purposes of Exams and other third-party Content Material;
    - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
    - to enable us to address our clients' specific product assessment needs;
    - to allow you to participate in interactive features of our service (when you choose to do so);
    - as part of our efforts to keep our site safe and secure;
    - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
    - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
  - **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).
  - **Submission of Personal Information on behalf of another: Kindly take note that if you provide information on behalf of someone else (i.e. your employees) then it is your responsibility to ensure that you have the authority and/ or have obtained the necessary consent from such person before making the information available to us. On receipt of personal information, we assume that the necessary consent has been obtained and will process the Personal Information as per your instructions. You indemnify us against any third party claim where a third party claim that personal information has been processed without the necessary consent or other available exception.**
  - We will only use your personal information received for another purpose when:
    - You consent thereto; or
    - It is in your interest, i.e. necessary to lessen or prevent a serious or imminent threat to life, health or safety; or
    - Is required by law or for law enforcement purposes.
  - Where consent for the use and disclosure of personal information is required, FAIS Exchange will seek consent from the data subject (you) directly.

## Discloser of your information

- We may share the information with any member in the Plumb Line Risk Alignment group, as defined in the Companies Act 2008 and/or your employer or party that has authorised you to access the FAIS-EXCHANGE.
- We may share the information with selected third parties including:
  - Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
  - Service providers that provide information processing services to us (as an operator). In those circumstances those third parties shall be required to enter into a non-disclosure agreement on no less stringent terms than found in this privacy policy and to process and protect the information as confidential and in accordance with our instructions.
  - Product Providers;
  - Regulatory Authorities to confirm your registration;
  - Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
  - Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- We may disclose the information to third parties:
  - In the event that we sell or buy any business or assets, in which case we may disclose the information to the prospective seller or buyer of such business or assets.
  - If we or substantially all of our assets are acquired by a third party, in which case personal information held by us about our customers will be one of the transferred assets.
  - If we are under a duty to disclose or share the information in order to comply with any legal obligation, or in order to enforce or apply our terms of use applicable to any particular site of ours or terms and conditions of supply of our services to you and other agreements; or to protect our rights, property, or safety, or the rights, property or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## Where we store your information

- Although we try to keep the information within the Republic of South Africa we may transfer it to, and store it at, a destination outside the Republic of South Africa ("RSA"). By submitting the information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that the information is treated securely and in accordance with this privacy policy. We will take all steps reasonably necessary to ensure that the information is treated securely and in accordance with this privacy policy and that said destination's data protection legislation is similar to the POPI Act.
- All of the information you provide to us is stored on our secure servers or in terms of paper documents, stored in secure locations. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site (login facility), you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- Records of *the information* will not be retained for longer than is necessary for operational or archiving purposes for which the information was collected, unless retention of record is required or authorised by law. Records of *the information* may be retained for periods in excess of those contemplated for historical, statistical or research purposes, subject to us establishing appropriate safeguards against the records being used for any other purpose and or we have de-identified the record(s).
- Unfortunately, the transmission of information via the internet is not completely secure. Although we will use appropriate and reasonable technical and organisational measurements to protect *the information*, we cannot guarantee the security of your data transmitted to our site or to any other location by electronic means; any transmission is at your own risk. HOWEVER, once we have received *the information*, we will use appropriate and reasonable technical and organisational measurements to try to prevent unauthorised access.

## Social media platforms (where applicable)

- Communication, engagement and actions taken through external social media platforms that we, our directors or employees participate in are custom to the specific terms and conditions as well as the privacy policies held with each social media platform respectively.
- You are advised to use social media platforms wisely and communicate/ engage with them with due care and caution in regard to their own privacy and personal information. **We will never ask for personal or sensitive information through social media platforms** and encourage users, wishing to discuss sensitive details or to resolve issues/ concerns, to contact us through primary communication channels such as by telephone or email.
- Our social networks page(s) may share web links to relevant web pages. By default some social media platforms shorten lengthy URL's. You are advised to take caution and good judgement before clicking any shortened URL's published on social media platforms by this website. Despite the best efforts to ensure only genuine URL's are published many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

## Interception and monitoring of information

- We reserve the right to intercept, monitor, copy or block communications to and from our communication facilities (including but not limited to our site, the login facility, email, SMSs etc.) in accordance with the relevant provisions of the law.

## Your rights

- **Right to be forgotten:** you have the right to have your personal information erased.

You may request the erasure of your personal information:

- when the personal information is no longer necessary for the purpose it was originally collected or processed for;
- when you withdraw your consent for the collection and processing of your personal information;
- when your objection to have your personal information processed overrides our legitimate interests for processing said information;
- when you object to the processing of your personal information for direct marketing purposes;
- when there is evidence that your personal information has been processed in contravention of the law;
- when there is a legal duty obliging us to erase your personal information; or
- when your personal information has been processed to offer information society services to a child.

**Right to data portability:** you have the right to obtain and reuse your personal information between different Responsible Parties. This equates to the right for you to request us to transmit your personal information directly to another Responsible Party. By law your personal information in our possession must be transmitted in a structured, commonly used and machine-readable format, but only applies to the personal information that you have provided to us. Personal information 'provided', however, may include history of web usage and search activities, traffic and location data, and/ or 'raw' data processed by connected objects such as smart meters or wearable devices. The right to data portability is subject to the following:

- you must have given your consent for the processing of your personal information or it is in terms of a contract; and

- the processing is carried out by automated means (i.e. excluding paper files).
- **Marketing:** You have the right to ask us not to process *the information* for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [FAIS Exchange](#) use the unsubscribe functionality on our email communications.
- **Third party websites/ social media sites:** Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.
- **Access to information:** You have a right to see/ access *the information* that we keep. You may instruct us to provide you with any personal information we hold about you upon receipt of a written request and payment of a fee as per the Promotion of Access to Information Act 2 of 2000 ("PAI Act") ([click here](#) to view the PAI Act). It is important to take note that not all information requested may be disclosed. Disclosure of information shall take place in accordance with the PAI Act.
- **Protection of personal information:** We may not process any personal information concerning you unless we have your prior consent to do so. It is important to take note that not all information may be prohibited from being processed or distributed. The processing of information shall take place in accordance with the Protection of Personal Information Act 4 of 2013 ("POPI" Act) ([click here](#) to view the POPI Act).
- **Please be aware that not all rights are absolute and may apply only in certain circumstances.**

### Quality of personal information

- It is your responsibility to check the accuracy of *the information* prior to submission to us. On receipt of *the information* we assume that you have checked it and that the information is accurate.
- Please contact us at [FAIS Exchange](#) if *the information* that we hold about you needs to be corrected or updated. Take note that a request to update *the information* may take up to 48 (forty-eight) hours to execute, or you could login to our online facility and update the information yourself.
- We will endeavour to the best of our ability to make available to you means to amend *the information* by yourself.

### Changes to our privacy policy

We may change the terms of this policy at any time by updating this document. We will notify you of any changes by placing a notice in a prominent place on the website or the software detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website, the software and our services. If you continue to use the website, software or our services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.