

Counterpoint Privacy Policy

1. Introduction

At Counterpoint we are committed to protecting your privacy and ensuring that your personal information, when collected is used and stored lawfully and in compliance with the Protection of Personal Information Act 2 of 2000 of South Africa.

In this Notice, “Counterpoint” or “we” refers to Counterpoint Boutique (Pty) Limited and all its associated companies that operate within the Republic of South Africa.

2. Information Collection

We may collect and process your personal information mainly to provide you with access to our services and products. In order for us to do this, you may be required to provide personal information to Counterpoint to help us deliver our services to you.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for a specific purpose.

Should you provide us with information about third parties (for example your spouse, dependents or beneficiaries), we will process their personal information only to pursue a legitimate interest. We will furthermore only process personal information for the purposes set out in this Policy.

You warrant that when you give us personal information about third parties, this information is correct and that you have received their permission to share their personal information with us for the purposes set out in this Privacy Policy or any other related purposes. If you are giving consent for a person under 18 (a minor) you confirm that you are a competent person and that you have authority to give their consent on their behalf.

We may collect information directly from you where you provide us with your personal details, for example when you apply for a product or services from us or when you submit enquiries to us or contact us.

3. Purposes for which we which we may use your personal information

We will use your personal information only for the following purposes:

- To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship with you
- To confirm and verify your identity, address and banking details where necessary
- For operational purposes to comply with the any regulations
- For the detection and prevention of fraud, crime and money laundering.

We will also use your personal information to comply with any legal and regulatory requirements which apply to us, or when it is otherwise allowed by law.

We may also process your information, including personal information, to conduct sanction screening against all mandatory and non-mandatory sanctions lists, and we may communicate such personal information to local and international Regulatory Bodies.

4. Our Ongoing Services

Given our aim to provide you with ongoing financial services, we would like to use your information to keep you informed and updated about our products and financial services. Please email unsubscribe@cpam.co.za if you do not want to receive such information.

You may also give and withdraw consent regarding your communication preferences by contacting us at 021 492-0200.

5. Disclosure of Information

From time to time, we may be required to disclose your personal information to external service providers (e.g. Sanlam Collective Investments, Sanlam Asset Management Ireland, Global Administrators, JTC Group and Maitland Fund Services) who are involved in the delivery of certain products or services to you. We have agreements in place to ensure that these organisations comply with Protection of Personal Information Act of South Africa.

We may share your personal information with:

- Third parties for the purposes listed above fraud prevention agencies, law enforcement agencies.
- Other companies or entities in the Counterpoint Group structure and, where appropriate, the Bridge Retirement Funds
- Where we have a duty or a right to disclose in terms of law or industry codes
- Where we believe it is necessary to protect our rights.

6. Information Security

We are legally obliged to provide adequate protection for the personal information we hold and to prevent any unauthorised access and use of your personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

Our security policies and procedures cover:

- Physical access and security of our premises
- Computer and network security
- Communications
- Contracts with external parties
- Retention and disposal of information

- Usage of personal information
- Governance and regulatory issues
- Monitoring access and usage of personal information
- Investigating and reacting to security incidents

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

7. Access to Information

You have the right to request a copy of the personal information we hold about you. To do this please email info@cpam.co.za and state your name, identification number and add “Request Copy of Personal Information” and we will respond as quickly as possible once we have verified your identity.

8. Objection to Processing

You have the right to object to the processing of your personal information. If you want to object, please contact us at info@cpam.co.za, clearly stating your objection and reasons therefor.

9. Correcting Your Information

You have the right to ask us to update or correct your personal information. If you want to correct your information, please contact us at info@cpam.co.za, clearly stating the corrections required and reasons therefor.

10. Deleting Your Information

You agree that we may retain your personal information until we destroy your information within the required timelines and standards. You have the right to ask for deletion or destruction of your personal information, a request we will not unreasonably withhold unless the law requires us to keep your information. You may request the deletion of your personal information by contacting info@cpam.co.za, clearly stating the deletions required and reasons therefor.

11. Changes to this Notice

Please check this website periodically to inform yourself of any changes to this Policy.

12. Information Regulator

You have the right to contact or complain to the Information Regulator, whose contact details are:

Contact - info@justice.gov.za

Complaints - Complaints.IR@justice.gov.za

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