

Privacy Notice

Who we are

LEAD is committed to protecting the information we hold about you.

This notice provides you with information about how, when, and why we use your personal information and how we keep it secure. It also sets out your rights under law, our responsibilities to you and how you can contact us.

This notice concerns any information that we collect in the following ways:

- Information we receive through our website www.leadfinancial.co.za.
- Information we receive as a result of the services and products that we offer, including through personal engagements, our related support, mobile or cloud-based services.

Should you have any questions about who we are, or what we do with your personal information, please Contact us

Part A - General Information

Information about other people

If you provide us with personal information about other people – such as a partner, your dependents, your family, your staff, etc. - you must show this privacy notice to them, and you must ensure that you have their consent to provide their personal information to us.

1. Information we hold about you
A description of the types of personal information about you that we collect, use, process and share.
2. Where we get our information about you
Details of information which you give to us, which we gather ourselves and which we seek from third parties.
3. How we use information about you and why
A description of what we use your personal information for, why we use it and why we are allowed to use it.
4. Whether you have to provide personal information
An explanation of whether you have to provide personal information to us and what happens if you do not.

5. When we share your personal information with others
Information about third parties that we share your information with.
 6. Where we transfer your data
A notification that your information is transmitted and processed outside South Africa.
 7. How long we will keep your information
A summary of the circumstances in which we can keep your information.
 8. Your rights ('data subject' rights)
A summary of your general rights over personal information. Please note that these do not always apply.
 9. LEAD Website and other websites
Information about the LEAD website and the information we collect.
 10. Future changes to this privacy notice
A notification that the privacy notice can change and that we will update you about changes.
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Part B - Contact Information

1. Contact us
The information you need to get in touch.
 2. Contact Regulator
Information about your local Data Protection Regulator and how you can contact them.
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Part A

1. Information we hold about you

As with other professional service providers and financial institutions, we collect personal information about you.

Most of this information is necessary for us to comply with our legal obligations, to enter into a contract with you, or for legitimate business purposes.

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When you enquire about our services or products, and during the course of our dealings with you, we will collect some personal information about you. This includes what you tell us about yourself and what we learn by having you as a client. Whether this collection is mandatory, or voluntary, will depend on the reason why we are collecting your personal information. For example, if you want to become a client with us, we require certain mandatory information from you to be able to add you to the relevant register of the service or product you subscribe to. If you refuse or fail to supply this information we will not be able to enter into a business relationship with you. However, if you voluntarily contact us about our services and you are not a client, you are in control of what information you volunteer and which is subsequently collected by us.

We have set out below a description of the types of personal information about you which we will collect and process in different situations when you interact with us.

1. Personal information that we generally process regardless of how you contact us, or for whatever reason, includes:
 - your title, full name, registered name, your contact details, including for instance your email address, home and mobile telephone numbers; and/or
 - your home address, correspondence address (where different from your home address) and address history.
2. If you decide to become a client or are already one, in addition to the above personal information, we may collect the following from you:
 - your date of birth and/or age;
 - financial information, including assets & liabilities, income & expenses and your bank account information;
 - proof of identification in the form of copies of your passport, driving license or other identity documents like utilities bills;
 - personal information and contact information which you provide in correspondence with us, whether by email, written letter, or telephone call or through our online enquiry system and/or;
 - information relating to your use of our service, any other products and services you currently have, you have applied for or you have previously held.
3. When you interact with the our Website, in addition to the above personal information, we may collect the following from you:
 - where you have specific needs and in which services you are enquiring about;
 - details pertaining to your qualifications, employment or business.
4. In addition to the above, we collect the following information from you when required:
 - to comply with our legal and regulatory requirements, your tax residency and/or nationality;
 - for anti-money laundering purposes, personal information which we obtain from identity verification agencies (see the section on 'Identity Verification Agencies' below);

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- for regulatory compliance purposes relevant to specific products and/or services, information about your employment status (including whether you are employed, retired or receive benefits) and regarding the source of your wealth.

2. Where we get our information about you

We may have information about you that you did not provide to us yourself.

In relation to the categories of personal information described above, we collect personal information in the following ways:

1. Information that you provide to us.

We typically collect the personal information directly from you as part of our client on-boarding process when you complete a Letter of Appointment form and provide proof of your identity. Additionally, we collect personal information from you when you correspond with us (whether by telephone, e-mail, or through our website). The nature of our relationship with you will determine the kind of personal information we might ask for.

2. Information that we collect or generate about you.

We will continue to collect additional personal information that we learn about you during the course of providing our services and products, such as:

- the way you use our preferred product providers online software; and/or
- information which you provide in correspondence to us (whether by telephone, e-mail, or through our website), including contact history.

3. Information that we obtain from other sources.

Sometimes we collect additional information about you from third parties. Specifically, we will obtain information about you from:

- agencies who we use to monitor and prevent money-laundering;
- agencies that provide us with background checking services; and/or;
- a third party who you have appointed to deal with your accounting, financial or tax affairs.

3. How we use information about you and why

We need to use some personal information to provide you with our service and to fulfil contract with you.

We mainly use the personal information we hold about you where it is necessary for us to perform our contract with you and/or to enable us to comply with legal obligations. Your personal information will also be used when it is in our legitimate interest. A legitimate interest is when we (and sometimes third parties) have a business or commercial reason to use your

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information. But even then, our legitimate interest must not unfairly go against what is right and best for you.

Each of these categories is a 'legal basis' that allows us to process your information under data protection law. We have provided further information below about what this actually means, in terms of how we process, or the purposes for processing your personal information relevant to each legal basis.

1. We need to use some personal information to provide you with our service and to fulfil our contract with you
 - to communicate with you about your financial and tax affairs, product or service, to verify that your instructions are genuine and to process them accordingly;
 - to enable us to process your instructions;
 - to notify you about changes to your financial or tax affairs;
 - to recover any money amount owed to us;
 - to investigate and deal with complaints or disputes;
 - to contact you when we have updated this Privacy Notice and consider that it is necessary to advise you about any changes to the way we are processing your personal information;
 - to transfer your personal information to any third party who replaces our products or services to you; and/or
 - to share your personal information with third parties (such as our service provider who assists us administer or process transactions on our behalf) if required for the management of your product or service.

2. Use of your information is necessary for us to comply with our legal obligations. We need to use some personal information to comply with legal obligations.
 - to verify your identity and to carry out regulatory checks (such as anti-money laundering and identity verification checks);
 - to enable a register of clients to be maintained;
 - to contact you with notices about your financial and tax affairs;
 - to detect, prevent and/or investigate fraud, money laundering and other financial crimes;
 - to comply with audit requests from our compliance officer;
 - to ensure you are eligible for our services or products;
 - to verify the adequacy of your income and net worth. Please note, this is not necessary for all clients, and only applies in specific situations and for specific products and/or services;
 - to comply with requests made by you when exercising your legal rights (such as those contained within this Privacy Notice);
 - recording digital meetings, incoming and outgoing calls for regulatory purposes;
 - to carry out monitoring of financial transactions for continued compliance with our regulatory obligations (such as anti-money laundering) and to keep records of the transactions we've undertaken;
 - when, to achieve the above purposes, we share your personal information with the following categories of individuals or organisations:
 - law enforcement agencies and governmental and regulatory bodies such as tax authorities, financial regulators/ombudsmen and non-financial regulators (depending on the circumstances of the sharing); and/or

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- courts and to other organisations where it is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.

3. Use of your information which is necessary to pursue our 'legitimate interests'

We are allowed to use your personal information to pursue our own interests as long as your fundamental interests do not override these.

This will include processing which, on balance, we consider is in our legitimate interests and which do not cause you undue prejudice. Our legitimate interests which are applicable to our processing of your personal information include:

- identification verification, and any anti-fraud, anti-money laundering and such other checks to confirm your identity and to ensure that the products which we handle for you are done in compliance with our legal obligations;
- recording digital meetings, incoming and outgoing calls for training, monitoring, and security purposes, as well as to keep an accurate record of any instructions received from you in relation to your financial and tax affairs;
- administering and managing your account(s) and services relating to that, updating your records, tracing your whereabouts to contact you about your account;
- to adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as tax authorities, financial regulators/ombudsmen and non-financial regulators;
- for management and audit of our business operations including accounting, tax and financial services;
- reviewing and improving the information provided on the our website to ensure is it user friendly and to prevent any potential disruptions or cyber-attacks;
- conducting analysis required to detect malicious data and understand how this may affect your IT system;
- for statistical monitoring and analysis of current attacks on devices and systems and for the on-going adaptation of the solutions provided to secure devices and systems against current attacks;
- to carry out searches at identity verification agencies pre-application, at the application stage, and periodically after that;
- to determine the target market for our existing and future products (e.g. determining whether a product is meeting the needs of clients);
- to contact you when we have updated this Privacy Notice and consider that it is necessary to advise you about any changes to the way we are processing your personal information;
- when, to achieve the above purposes, we share your personal information with the following categories of individuals or organisations:
 - our legal and other professional advisors;
 - governmental and regulatory bodies such as tax authorities, financial regulators/ombudsmen and non-financial regulators (depending on the circumstances of the sharing);
 - tax authorities who are overseas for instance if you are subject to tax in a different jurisdiction, we may share your personal information directly with relevant tax authorities (instead of through the local authority);

- other organisations and businesses who provide services to us under contract such as agents that recover money owed to us, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
- identity verification agencies (see below for more information); and/or
- financial product providers with whom we have signed contracts, that provides you with the suitable financial product.

(Should you have any questions about the above listed categories of people and/or organisations, please contact us using the contact information provided in this Privacy Notice.)

If you have further questions about the third parties we share your personal information with, please contact us.

4. Use of your personal information with your consent

Where we are relying on your consent to process your personal information, you are entitled to withdraw your consent at any time.

However, as noted above, we are usually processing your personal information based on another reason, in which case withdrawing your consent will not change how we process your personal information. If you wish to withdraw your consent you may do so by contacting us.

Unlike the uses described above, sometimes we rely on your consent to use your personal information. We will rely on your consent:

- when you request that we share your personal information with someone else and consent to that (for example if you engage the services of a professional after you have become a client of ours and request that we provide information about your financial and tax affairs to that professional);
- when you volunteer information to us in correspondence, which information we need in order to respond to your enquiry, and only where lawful to do so.

You have the right to withdraw your consent at any time. Please note, if you do withdraw your consent, this will mean that we will stop similar future processing. However, the withdrawal of your consent will not invalidate any processing which we previously undertook before you withdrew your consent.

Please note that, where we rely on another lawful reason to process your personal information which does not require your consent, withdrawing your consent will not affect that processing. This is the case where the processing is necessary for our performing our contract with you, or where we must process your personal information to comply with law, as described above. We will continue to process your personal information for those lawful purposes notwithstanding the fact that you have withdrawn your consent for one of the above listed purposes that requires your consent.

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4. Whether you have to provide personal information

If you want to use our services, there is some information which you will be required to provide to us either because of legal requirements, or because we need that information to provide our services to you.

We are required to collect some personal information by law and regulation. For example, we are required to verify your identity before we can accept our appointment.

In other cases we need the information in order to provide our service to you.

We will tell you when the personal information requested is mandatory, or if it is voluntary. If you do not provide that personal information that is mandatory, we will be unable to properly provide you with the services and/or perform all obligations under our agreement with you.

Where you choose not to provide us voluntary personal information this may reduce the quality of service we are able to provide (for example, if you only provide us your postal address and do not provide us with your e-mail address, we will only be able to contact you by postal mail).

5. When we share your personal information with others

Your personal information will be shared with other businesses, regulators and authorities.

If you have further questions about the third parties we share your personal information with, please contact us.

Yes, there are times when we are either mandated by law to disclose your personal information to third parties (such as Tax authorities). In addition, where we or a product provider help provide you with service or products to fulfil your financial and tax needs, we will also disclose your personal information to those third parties, but always subject to appropriate contracts and safeguards.

We will never sell, rent or trade your personal information.

We will share your information with others who have a duty to keep it secure and confidential, and where we have a lawful reason for doing so, as explained above. The categories of organisations that we will share your information with are:

- accounting, tax and payroll software providers;
- our financial product service providers, who administer or process information on our behalf (such as a fund's transfer agent, registrar, paying agent, representative, facilities agent, auditor, depository, custodian, investment manager, sub-investment manager and global distributor (if relevant));
- professional advisors;
- anyone we transfer our rights and duties to.

We can also share your information with overseas regulators and authorities in connection with their duties (such as crime prevention), and/or in connection with our compliance with legal and/or regulatory obligations.

We cannot control all use of your information by third parties (especially where they are not our service providers and under contract with us, for example personal information shared with regulators). As such, where your personal information has been shared with another data controller entity, you will have rights over how that third party handles your personal information and you can and should contact those parties directly if you want to exercise your rights in relation to those third party's uses of your personal information.

Your personal information will be shared with credit reference agencies for anti-money laundering and identity checks.

Sharing with identity verification agencies

In order to become a client of ours, we will perform identity checks on you with one or more credit reference agencies ('CRAs'). To do this, we will supply your personal information to CRAs and they will give us information about you. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and identity verification information.

6. Where we transfer your data

We process your data in South Africa. We may also transfer your data outside of South Africa.

We will also share your personal information, where necessary, with regulatory authorities in other jurisdictions in which you invest. It is possible that those authorities will, in turn, also share your information with other regulators. However, when they do so, they do so in their own legal capacities. So if you would like more information about how they handle your personal information, you will need to contact them directly.

Where we transfer your personal information outside of South Africa, the safeguards that we will use to protect your personal information include contractual obligations imposed on the recipients of your personal information. Those obligations require the recipient to protect your personal information to the standards required in that specific jurisdiction. Safeguards also include requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing and where the framework is the means of protection for the personal information.

7. How long we will keep your information

Your information may be held for a considerable period after our relationship ends (or indefinitely if anonymised).

If you have further questions about our data retention practices, please contact us.

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We will keep your personal information as long as you are a client of LEAD.

After you cease to be a client of ours, we may keep your data for up to an additional 10 years for one of the below reasons:

- To respond to any questions or complaints;
- To show that we treated you fairly;
- To maintain records in accordance with the rules that apply to us.

We may keep your data for longer than 10 years if we cannot delete it for legal, or regulatory reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use the data for those purposes and, to the extent possible anonymised.

If we anonymise your personal information so that it can no longer be associated with you, it will no longer be considered personal information, and we can use it without further notice to you.

8. Your rights ('data subject' rights)

You have a number of rights over your personal information including a right to object to the processing of your information.

You will not be able to use these rights in all circumstances.

You are also entitled to make a complaint to the regulator.

Under data protection law you have a number of rights (set out below). Please note that these rights are not without limitation, and in some instances may not be available.

Where applicable, you have the right to:

- be informed about our processing of your personal information;
- have inaccurate/incomplete personal information corrected/completed;
- object to the processing of your personal information;
- restrict the processing of your personal information;
- have your personal information erased;
- request access to your personal information and to obtain information about how we process it;
- move, copy or transfer your personal information digitally;
- object to automated decision making, such as profiling.

To exercise your rights as set out above, please write to us. There is no fee for making these requests. However, if your request is excessive or unfounded, we can charge a reasonable fee or refuse to comply with it.

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You also have the right to lodge a complaint with your local data protection regulator if you think that we have infringed upon any of your rights. Information about your local data protection regulator is set out in Part B.

Pursuant to applicable law, you will not be discriminated against for exercising certain of your rights as set out above.

9. LEAD Website and other websites

The content of this notice is likely to change over time. We will tell you if it changes.

We will always have the latest version available on our website.

If you use our website, we may collect technical information through the use of cookies. For example, what pages of our website were visited by each user, any documents downloaded and security incidents.

If you use our website and follow a link from it to another website different privacy policies may apply. Prior to submitting any personal information to a website you should read the privacy notice applicable to that website.

10. Future changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will notify you when we make any substantial updates.

We will also notify you in other ways from time to time about the processing of your personal information.

Part B

Contact us

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Contact Regulator

<https://www.justice.gov.za/inforeg/contact.html>

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