

# **PROTECTION OF PERSONAL INFORMATION POLICY**



**STAR INVESTMENT PARTNERS (PTY) LTD**

**COMPANY REGISTRATION NUMBER: 2003/025340/07**

**FSP NUMBER: 19906**

## 1. INTRODUCTION

- 1.1. Personal information is information that can be related to an identifiable natural person or, to the extent applicable, a juristic person (known as a "data subject").
- 1.2. Protection of personal information is enshrined in the Constitution of South Africa, and this policy aims to give effect to this right by regulating the way Star Investment Partners (Pty) Ltd processes personal information.
- 1.3. Processing of personal information refers to any activity concerning personal information including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.
- 1.4. Star Investment Partners (Pty) Ltd is an authorised financial services provider whose business includes investment management and financial advisory services. Star Investment Partners (Pty) Ltd may therefore need to collect personal information from its clients to comply with applicable law and/or to render efficient and effective services.
- 1.5. Star Investment Partners (Pty) Ltd, as the responsible party, is committed to principles of accountability, transparency and consensual and responsible processing of personal information.
- 1.6. It is the intention of Star Investment Partners (Pty) Ltd that this policy will protect an individual's personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.

## 2. PURPOSE OF PROCESSING PERSONAL INFORMATION

- 2.1. Personal information is processed for the following purpose(s):

We collect and process your personal information mainly to contact you for the purposes of understanding your requirements and delivering services accordingly.

For this purpose, we will collect contact details including your name and organisation.

We collect information directly from you where you provide us with your personal details.

Where possible, we will inform you what information we need from you to enable us to provide our agreed upon services, and what information is optional.

Website usage information may be collected using "cookies" which allows us to collect standard internet visitor usage information.

- 2.2. Any further processing of data must be compatible with the purpose(s) for which the information was collected.
- 2.3. Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, are stored in archives for record-keeping and backup purposes only.
- 2.4. Star Investment Partners (Pty) Ltd will not, without an individual's consent, share information with any other third parties, unless requested by law, without written consent by the person to whom the personal information relates.

## 3. OBTAINING PERSONAL INFORMATION

- 3.1. Personal information is acquired with the consent of the data subject, which consent can be withdrawn at any time by notification to Star Investment Partners (Pty) Ltd.

3.2. As far as possible, personal information is collected directly from the data subject.

3.3. Star Investment Partners (Pty) Ltd is committed to ensuring the accuracy of the personal information collected and uses the following measures to verify:

To gather contact information;

To confirm and verify your identity or to verify that you are an authorised user for security purposes;

For the detection and prevention of fraud, crime, money laundering or other malpractice;

To conduct market or customer satisfaction research or for statistical analysis;

For audit and record keeping purposes; In

connection with legal proceedings.

#### 4. STORAGE AND SECURITY OF PERSONAL INFORMATION

4.1. Star Investment Partners (Pty) Ltd strives to ensure the security, integrity and privacy of personal information submitted. Star Investment Partners (Pty) Ltd will review and update its security measures in accordance with legislation and technological advances. Star Investment Partners (Pty) Ltd will endeavour to take all reasonable steps to protect the personal information, which an individual submits to Star Investment Partners (Pty) Ltd or to Star Investment Partners (Pty) Ltd's online products and services. Star Investment Partners (Pty) Ltd will always set the highest standards to ensure the integrity of their systems.

4.2. Star Investment Partners (Pty) Ltd may engage with other organisations to provide support services to Star Investment Partners (Pty) Ltd. Third Parties are obliged to respect the confidentiality of any personal information held by Star Investment Partners (Pty) Ltd. A Service Level agreement is in place with all Third parties to ensure adherence to all Privacy Policies.

4.3. Star Investment Partners (Pty) Ltd's employees are obliged to respect the confidentiality of any personal information held by Star Investment Partners (Pty) Ltd. All employees are required to sign an employment contract which includes a confidentiality clause.

4.4. Star Investment Partners (Pty) Ltd will not reveal any personal information to anyone unless:

4.4.1. It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law;

4.4.2. It is in the public interest to prevent financial loss;

4.4.3. The FSP needs to do so to protect their rights.

4.5. Star Investment Partners (Pty) Ltd endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date.

4.6. Star Investment Partners (Pty) Ltd employed the following security measures to ensure the privacy and integrity of the personal information collected:

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 private information; Investigating  
and reacting to security incidents.

- 4.7. If at any time, an individual discovers that information gathered about them is incorrect, they may contact Star Investment Partners (Pty) Ltd to have the information corrected.
- 4.8. Star Investment Partners (Pty) Ltd will not retain and/or store personal information longer than is necessary given the purpose for which the personal information was collected except for historical, statistical and research purposes and then only with suitable safeguards in place to ensure the privacy and integrity of the personal information.

## 5. BREACH OF SECURITY

- 5.1. Star Investment Partners (Pty) Ltd undertakes to ensure reasonable organisation and technical measures are in place to prevent, insofar as possible, any infringements on the privacy and integrity of personal information.
- 5.2. In the event of a breach of security Star Investment Partners (Pty) Ltd undertakes to notify the Regulator and the data subject in writing as soon as possible of any breach of security.
- 5.3. Notification to the data subject shall be done via mail to the data subject's last known physical or postal address, e-mail to the data subject's last known e-mail address, or as directed by the Regulator.

## 6. TRAINING

As part of its commitment to ensuring organisation wide compliance with this policy, Star Investment Partners (Pty) Ltd implements annual training for all staff member of Star Investment Partners (Pty) Ltd.

## 7. INFORMATION OFFICER/CONTACT DETAILS

Any questions relating to Star Investment Partners (Pty) Ltd's privacy policy or the treatment of an individual's personal data should be addressed to the Information Officer, whose contact details are:

INFORMATION OFFICER: Robert Michael Foster

Telephone number: +27 86 177 7574

Physical & Postal address: Canal Edge 2A, Unit 13, Tyger Waterfront, Bellville, 7530

Email address: robert@starip.co.za

Website: www.starip.co.za

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V 1.0	2021	General update	Phil
V 1.1	2024	General update	Phil
V 1.2	2026	General update	Twanette