

PRIVACY NOTICE

EasyEquities

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1. Policy approval and information

Policy drafter	Sascha Graham
Policy reviewer	Gigi Vorlauffer
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2. Introduction

As part of the day-to-day business of EasyEquities and in order to provide our customers and potential customers with our products and services, we need to process the personal information (which may include special personal information) of our customers and potential customers (references to “personal information” throughout this document include references to “special personal information” as applicable).

The right to privacy is an integral human right recognised and protected in the South African Constitution and the Protection of Personal Information Act, 2013 (“**POPIA**”). EasyEquities is committed to protecting your right to privacy, protecting your personal information and ensuring your personal information is processed lawfully and in a reasonable manner that does not infringe on your right to privacy and complies at all times with POPIA.

EasyEquities forms part of the Purple Group Limited group of companies (the “**Group**”) and we process your personal information in terms of the Group’s Protection of Personal Information Policy which can be accessed on the website. Any reference to “us”, “we” or “EasyEquities” is a reference to EasyEquities and all other entities in the Group who process your personal information when you receive products and/or services from EasyEquities or when you may potentially receive product and/or services from EasyEquities.

EasyEquities acts in its capacity as a responsible party (or an operator if the context requires) for the purposes of POPIA when processing your personal information. Any reference to “you”, “your” or “yours” is a reference to any of our clients or potential clients who are considered data subjects for the purposes of POPIA.

This Privacy Notice sets out how we process your personal information and sets out your rights in respect of us processing your personal information.

Defined terms used but not defined in this Privacy Notice, have the same meaning as in POPIA.

3. What personal information do we collect?

We collect personal information (which may include special personal information) necessary to fulfil our obligations to our clients and potential clients in the course of providing our products and/or services which include a broad range of financial services and technology services.

We may collect the following types of information (which may include special personal information) about you:

Natural persons: name, surname, identity number, age, contact details, physical address, postal address, date of birth, gender, information about your income and wealth, bank account details, employment details, citizenship, nationality, country of birth, sex, marital status, financial history, computer hardware and software used by you (which can include your IP address, browser type, domain names, access times and referring website addresses), your username and password, tax information, bank statements, investment information, family/beneficiary details, credit score and history, mental and physical health information (which can include your HIV status and past and present mental and physical health information), past and present insurance information and any other similar information which we need to provide you with a particular product and/or service.

Juristic persons: name, registration number, registered address, postal address, contact details, entity type, information about your income and wealth, bank account details, shareholding and director details, incorporation information, financial history, computer hardware and software used by you (which can include your IP address, browser type, domain names, access times and referring website addresses), your username and password, tax information, bank statements, investment information and any other similar information.

Please note that we only process information which constitutes your special personal information with your express consent as set out in the relevant contractual terms, including but not limited to, the EasyEquities Terms and Conditions or other agreements entered into with you unless such express consent is not required in terms of POPIA or where we are an operator of a responsible party who has received your express consent or is otherwise authorised to process your special personal information.

Please note that if you provide us with the personal information of third parties (such as the personal information of your beneficiaries or family members), you warrant to us that you have obtained their express consent to do so and/or your competency if the third party is a minor.

We also keep records, current and historical, of your investments and transactions as well as records of your investment performance.

The information which we collect is in compliance with our legal and regulatory obligations and duties based on the licences we hold and the laws which are applicable to the products and services we provide.

We also keep track of our websites and the pages our customers visit within EasyEquities (desktop platform/mobile app), in order to provide the most effective user experience for our clients which may include product/feature enhancement/amendments and targeted educational and marketing content.

Where we use third parties to process your personal information on our behalf, we do so in accordance with the provisions of POPIA.

2. How do we collect your personal information?

We collect your personal information in numerous ways for example: your use of our services and other dealings with us including through the account opening process, accessing our services or products directly from us or through our business partners, information provided and collected during the course of our relationship with each other, your use of our products and platforms, information collected during correspondence and ongoing customer due diligence. We may also collect personal information about you from publicly available sources.

In compliance with our regulatory duties and laws applicable to us, we may record communications with you which include telephonic, electronic in person or other methods of communication between us. Please note that telephonic conversations may be recorded without the use of a warning message or tone. If you visit our offices, we may have CCTV cameras which may record your images and conversations.

Additionally, we obtain personal information about you through your use of our websites, platforms, applications, or through the use of cookies and pixel tracking, using both internal and third-party software services, in particular by recording your activity and which pages you look at on our websites and your activity on our platforms for the purpose of conversion tracking and serving communications and ads that are relevant to your interests.

3. The lawful basis on which we process your personal information

In most instances we are required to process your personal information in order to comply with the laws and/or regulations which are applicable to us and to the products and services we provide.

However, POPIA and other applicable data protection legislation allows us to process your personal information if:

- we obtain your consent (or the consent of a competent person where the data subject is a minor);
- the processing is necessary for us to carry out actions for the conclusion of or performance under a contract entered into between us;
- the processing complies with an obligation imposed on us as the responsible party by law;
- the processing protects your legitimate interests;
- the processing is necessary for the proper performance of a public duty or in the public interest; or
- the processing is necessary for pursuing our legitimate interests as the responsible party or those of a third party to whom the information is supplied.

All the processing of personal information carried out by us is in accordance with the aforementioned permitted purposes.

Where our processing of your personal information requires your express consent, we will request your consent, or the consent from another party that has the required authority/competency to do so on your behalf.

If we rely on your consent as set out above as the lawful basis for processing your personal information, please note that you have the right to withdraw that consent at any time by contacting us using the contact details at the bottom of this Privacy Notice. However, please note that your ability to withdraw your consent may be limited by law and may likely mean that we are no longer able to continue to provide services to you and will need to terminate the relationship.

4. What do we do with the personal information we process?

We may use the personal information which we process in the following ways:

- providing you with any services and/or information which you request from us which includes carrying out our obligations to you in respect of any contract/s entered into between us;
- to notify you about changes to our products/services or the terms and conditions governing our relationship;
- to inform you about new products or services and promotional competitions or campaigns;
- to use our social media sharing features across our platform and sites;
- perform initial and ongoing customer due diligence reviews;
- assigning you a unique identifier;
- providing you with financial products and financial services;
- performing a financial needs analysis to consider your needs, circumstances, risk tolerance and capacity to understand the features and complexity of the financial services and/or financial products which we provide or give access to;
- screening of United Nations lists, media sites and general internet searches;
- performing risk assessments;
- audit and record-keeping;
- legal proceedings;
- to comply with our legal and regulatory obligations;
- perform suitability assessments or credit checks required in terms of applicable law;
- to provide you with information electronically or by telephone about products and services of a similar nature to those you are already using with us or expressed an interest in or which we may think may be of interest to you;
- to measure and improve the customer experience across our products and platforms;
- to administer our sites and platforms for the purpose of troubleshooting, data analysis, load management, performance testing, quality assurance, penetration or security testing, research, statistics and surveys;
- verify your identity and perform ongoing monitoring in accordance with our regulatory obligations;
- providing you with popular products and products purchased by other clients;
- to keep our sites and platforms safe and secure from cyber crime;
- to prevent and detect money laundering, terrorist financing and other financial crime such as fraud;
- to deliver target advertisements and educational content to you; and
- to obtain your feedback on your actions or our products/services or those of a third party or partner.

You do have the right to ask us not to process your personal information for the purposes of direct marketing. You can exercise your right by contacting us at the contact details at the end of this Privacy Notice or by unsubscribing from any marketing emails you receive from us by following the instructions in those emails. We urge you to set your email preferences to ensure that you only receive the emails you want to receive from us. Please note that if you unsubscribe from email communication from us relating to the performance of our services to you, you may not hold us liable for any loss you suffer as a result of this.

5. Disclosure of your personal information

EasyEquities does not sell, trade or rent your personal information to third parties.

We may share your personal information with selected third parties which include:

- our service providers, suppliers and sub-contractors for the performance of any contract we have entered into with them in respect of our services and products provided to you or in respect of running our internal business operations;
- other financial services providers where we act as the intermediary on your behalf in accordance with our contract with you;
- governmental, judicial or regulatory bodies or agencies to comply with our legal and regulatory obligations;
- fraud prevention agencies and other organisations to prevent or detect financial crime;
- credit reference agencies or verification companies to conduct electronic checks on you to verify the information you have provided;
- software providers that assist us in the optimisation of our sites and platforms; and
- business partners of EasyEquities which share you as a client and where you access EasyEquities and its platform from.

We may also share your personal information across the Group to enable us to efficiently provide you with our services and optimise the service and products we provide to you.

Where your personal information is shared with third parties, we ensure at all times that your personal information is given the same level of protection and is processed in accordance with applicable laws.

6. Do we make automated decisions about you?

We do not carry out any automated decisions about you by processing of personal information through automated means to profile you.

7. How do we store your personal information?

We store your personal information using a combination of secure physical and virtual servers. Your personal information is secured using industry recognized and accepted strong encryption solutions at rest and in transit.

If your personal information is no longer needed by us, we will take the appropriate steps to remove the details which may identify you and securely destroy the records. Please note that applicable laws may require us to hold your personal information for a period of time after our relationship has ended. For example, the anti-money laundering and anti-terrorist financing laws which we are required to abide by, require us to retain your records for a period of 5 years after our business relationship has terminated.

8. How do we manage and safeguard your personal information?

EasyEquities ensures that it has the appropriate technical and organisational measures in place to ensure that your personal information is protected.

We train our employees on the importance of data privacy and ensure that any employees who handle or have access to your personal information do so in accordance with applicable laws. Our employees also receive cyber security training on an ongoing basis.

We have appointed an information officer and a deputy information officer to ensure management of your personal information is in accordance with this Privacy Notice, our other policies and applicable laws.

However, please note that it is your responsibility to ensure you secure the personal information which you give to us and the manner in which you give it to us.

9. What are your rights as a data subject?

Section 5 of POPIA provides that you as a data subject have the right to have your personal information processed in accordance with the conditions for lawful processing including, in summary, the right, amongst others:

- **To be notified.** You have the right to be notified that personal information about you is being collected or has been accessed or acquired by an unauthorised person.
- **To have access.** You have the right to establish whether we hold personal information of yours and request access to the personal information which we have of yours. You can do this by submitting a subject access request.
- **To request correction, destruction or deletion of your personal information.**
- **To object to the processing of your personal information if there are reasonable grounds to do so.**
- **To submit a complain to the Information Regulator and institute civil proceeding regarding any interference in the protection of your personal information.**
- **To not be subject to automated decision making and profiling.**
- **To object to the processing of your personal information for direct marketing.**

Where you have provided us with consent to process your personal information, you may withdraw your consent at any time. There are no penalties for withdrawing your consent however, it might mean that we will no longer be able to continue providing you with our services. Please also note that in some instances we will still be required to store your personal information after your consent has been withdrawn due to applicable laws.

10. Do we transfer your personal information outside of South Africa?

Yes, we may transfer your personal information to our service providers, suppliers, sub-contractors or other group companies who are outside of South Africa. However, we will only do this in accordance with applicable laws.

11. Use of Cookies

The EasyEquities' websites and platforms use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you personalize EasyEquities pages, or register with EasyEquities site or services, a cookie helps EasyEquities to recall your specific information on subsequent visits. When you return to the same EasyEquities website, the information you previously provided can be retrieved, so you can easily use the EasyEquities features that you customized.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the EasyEquities services or websites you visit.

12. Links to external websites

Our sites may contain links to and from other websites. If you follow a link to another website, please note that these websites have their own privacy policies and we do not accept any liability for how these websites process your personal information.

13. Access requests and contacting us

You have the right to request a copy of the personal information which we hold about you. If you would like a copy your personal information, you may contact us as follows:

Submitting a ticket via our ticketing system here: <https://support.easyequities.co.za/support/tickets/new>

Information officer:

Name: Nicola Comminos
Tel: +27 82 298 6712
Email: nicola@purplegroup.co.za
Fax: N/A

Deputy Information officer:

Name: Sascha Graham
Tel: +27 61 473 0625
Email: sgraham@purplegroup.co.za
Fax: N/A

If you have any questions or queries regarding the contents of this Privacy Notice or any privacy issues, please contact us as set out above.

14. Complaints

If you would like to complain about any of our privacy practices and the way protect or process your personal information, you can submit a complaint using the ticketing system ([here](#)) or by sending an email to our information officer and/or deputy information officer. We will respond to your complaint as quickly and efficiently as possible.

If you are not satisfied with our resolution of your complaint, you have the right to lodge your complaint directly with the information regulator by sending an email to complaints.IR@justice.gov.za or visiting their website at <https://inforegulator.org.za/>.