



COMPLIANCE TOOLBOX[®]

Enable, Enhance, Empower.

OUR PRIVACY STATEMENT

PROTECTION OF PERSONAL INFORMATION NOTICE

The Protection of Personal Information (POPI) Act No.4 of 2013 requires us to inform you how we process and disclose personal information we obtain from you. We are committed to protecting your privacy and will ensure that your personal information is used appropriately, transparently, and according to applicable law. This Privacy Statement applies to all clients, associates and staff of **The Compliance Toolbox (Pty) Ltd** and governs information collection, storage, and usage. By using the services provided by The Compliance Toolbox (Pty) Ltd, you grant permission and consent to the data practices described in this policy.

DEFINITIONS

“We”, “us” and “our” refers to the FSCA authorised compliance practice, **The Compliance Toolbox (Pty) Ltd (“CTB”)**, a private company with limited liability, registered under the company laws of the Republic of South Africa, registration number: **2003/007119/07**.

“You” and “your” refers to you as the principle party of the business relationship and or your representatives, collectively.

“Your personal information” refers to personal information about you, your business, your shareholder(s), representatives, your executives/leadership of the organisation, product suppliers, third party suppliers etc. (as may be relevant). More detail of the specific information that may need to be processed from time to time or on-going is detailed throughout this document.

“Processing information” means the activities of collecting, recording, organising, storing, updating, distributing, and removing or deleting personal information.

“Responsible party” a person of senior authority and instrumental in a business, setting out the purpose for information obtained and the processing thereof. This could also be in the form of a public or private body.

“Operator” A person who processes information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

“A record” any and all information irrespective of the format in which it is recorded, not limiting to electronic or hard copy files held by a responsible party.

1. What services we provide

The Compliance Toolbox (Pty) Ltd is an FSCA authorized compliance practice, providing compliance oversight to small and medium authorised financial services providers and other entities that are subject to compliance with the Financial Intelligence Centre Act.

Besides monitoring of the compliance function within entities, we also conduct monitoring of transactions concluded between our provider clients and their consumer clients. It should therefore be understood that we process information of our provider clients, as well as that of their consumer clients.

2. What information we collect

The Compliance Toolbox (Pty) Ltd collects personally identifiable information, such as identity numbers, email addresses, names and surnames, home or work addresses or contact telephone numbers and relevant competence requirements. This is to contribute process any information that may be required for training/learning programmes developed by The Compliance Toolbox (Pty) Ltd and the issuing of supporting training certificates in respect of content we are accredited for by the Financial Planning Institute (FPI) and to provide you with access to our services and benefits through our approved facilitators.

The Compliance Toolbox (Pty) Ltd also collects anonymous demographic information, which is not unique to you, such as your region, postal code, age, gender, etc. This is to contribute to industry statistical information.

We collect personal information directly from you when you apply for registration on training/learning programmes or for the services and products we offer.

Information is used by The Compliance Toolbox (Pty) Ltd for the purpose of delivery of our services to your business and its representatives as well as to maintain quality of the service as agreed in the Service Level Agreement (SLA), concluded between the parties of the business relationship. Please be advised that if you directly disclose personally identifiable information or personally sensitive data through various channels of The Compliance Toolbox (Pty) Ltd, this information may be collected and used by other officers within the Company.

The Compliance Toolbox (Pty) Ltd is not responsible for the privacy statements or other content on websites outside of the Company’s control, and The Compliance Toolbox (Pty) Ltd partner websites or public domains.

3. How we use your information

We will use your personal information only for the purposes for which it was collected and agreed to with you. This may include, and not necessarily be limited to:

- ❖ Processing your information for training initiatives, direct services or partners services offered by The Compliance Toolbox (Pty) Ltd,
- ❖ Processing of invoices and payments to The Compliance Toolbox (Pty) Ltd,

- ❖ Confirming and verifying your identity and specific personal particulars including qualifications and employment experience (current and historical) for purposes of verifying your credentials to represent the organisation by which you are employed,
- ❖ Debt tracing or debt recovery for accounts that may be in arrears,
- ❖ Conducting customer satisfaction surveys or for statistical purposes,
- ❖ Auditing, Monitoring, and record keeping requirements,
- ❖ Providing our services to you, to carry out the services you requested and to maintain and constantly improve our services to you,
- ❖ Providing you with communications in respect of The Compliance Toolbox (Pty) Ltd for the purposes of maintaining industry standards and obligations imposed on you (your organisation) for the purposes of improving your relationship with the regulator(s) of the industry in the context of a compliance and legal obligations,
- ❖ In connection with and to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law, or which may apply to you (your organisation)

4. Disclosure of your information

We may disclose your personal information to the facilitators who are assigned to the services or products, compliance officer(s), trainee compliance officer(s), industry regulators which may be applicable to or legally imposed on your organisation for the purpose of meeting ongoing industry standards and statutory obligations. We may also share your personal information with and obtain information about you from third parties for the purposes listed in 2 above. We may also disclose your information where we have a duty or a right to disclose in terms of applicable legislation, the law or industry codes or where it may be necessary to protect our rights.

If we become involved in a proposed or actual sale, merger, acquisition of any assets, we have the right to share your personal information with third parties in connection with the transaction. In the case of a merger, acquisition or sale, the new entity will have access to your personal information. The terms of this Privacy Statement will continue to apply.

5. Safeguarding your information

The POPI Act requires us to adequately protect the personal information we hold and to avoid unauthorised access and use of your personal information. We continuously review our security controls and processes to ensure that your personal information is secure. If we need to transfer your personal information to another country for processing or storage e.g. use of services such as Dropbox, Kotive, WeTransfer, Trello, and the like, we will ensure that any party to whom we pass on your personal information, is subject to the same level of protection of personal information as required from us, as is able to provide the same assurances of safeguarding such personal information.

For the purpose of reviewing the privacy policies of the systems (services) in use by The Compliance Toolbox (Pty) Ltd you can access the following links to review their Privacy Policies / Statements:

- ❖ Dropbox <https://www.dropbox.com/privacy>
- ❖ Kotive <https://www.kotive.com/terms>
- ❖ WeTransfer <https://wetransfer.com/legal/privacy>
- ❖ Trello <https://www.atlassian.com/legal/privacy-policy>
- ❖ Zoom <https://zoom.us/signin>
- ❖ MS Teams <https://microsoft.com/en-za/microsoft-teams/log-in>

6. Your rights to access and correction of your personal information

You have the right to access the personal information we hold about you. You also have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before providing details of your personal information or making changes to your personal information. You can contact us at the numbers or addresses listed below and request the information you would like:

Information Officer: Ryno Van Wyk
Telephone number: 011 794 1189 | 011 028 2282
Address: 32 Serissa Avenue, Roodekrans, Roodepoort, 1724
Email address: Ryno@ctb.co.za
Website: www.ctb.co.za

Please note that a request for information may be subject to payment of a predetermined amount. Where such payment is required an estimate of the expected cost shall be formally quoted for explicit agreement and acceptance prior to preparation of such record.

7. Changes to this Notice

Please note that we may amend this Notice at any time. Please check our website periodically to become informed of any changes, as may be the case from time.

8. General

If for any reason, you believe that we have used your personal information (your organisation or of your representatives) contrary to this Privacy Statement, you must first attempt to resolve any concerns with us. If you are not satisfied after this process, you have the right to lodge a complaint with the Information Regulator, under POPIA.

(Authorised Compliance Practice) Appointed Information	Information Regulator's Office
<p>Information Officer: Ryno Van Wyk Telephone number: 011 794 1189 011 028 2282 Address: 32 Serissa Avenue, Roodekrans, 1724 Email address: Ryno@ctb.co.za</p>	<p>SALU Building, 316 Thabo Sehume Street, PRETORIA Tel: 012 406 4818 Fax: 086 500 3351 infoereg@justice.gov.za</p>

For existing clients of The Compliance Toolbox (Pty) Ltd this Privacy Statement will be included as an Addendum to your Service Level Agreement (SLA) with our Company. For new clients it will form part of concluding a Service Level Agreement (SLA) at the commencement of the business relationship.

DOCUMENT TITLE	PRIVACY STATEMENT		
ISSUE DATE	2021/07/07	REVISION ALLOCATION	1
DOCUMENT CLASSIFICATION	PIPSCTB21		

HISTORY OF REVISIONS			
REVISION	ISSUED	DESCRIPTION	REVIEWED BY
1	2021/07/07	Development & approval of Company Privacy Statement	JP (training compliance officer) and POPI task team (Charmaine, Ryno, Lynette, Fallon)