

# PRIVACY POLICY

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## **1. Introduction**

Swyft Markets South Africa (Pty) Ltd (Swyft Markets) is a private company registered in South Africa. Swyft Markets is an Authorised Financial Services Provider. Swyft Markets provides financial services to clients in line with the Financial Advisory and Intermediary Services Act.

To achieve our objectives, we must process Personal Information, which includes Personal Information in terms of the Protection of Personal Information Act No 4 of 2013(POPI). Information that alone or jointly with other factors identifies you as a person is Personal Information in terms of POPI. Personal Information includes, but is not limited to, information such as your name, contact details, telephone number, biometric information, registration number etc.

## **2. Purpose**

The protection of Personal Information is important to Swyft Markets, and we have therefore developed this Policy that sets out the way we process Personal Information.

We treat all Personal Information that is collected as private and confidential.

## **3. Right to change this Privacy Policy**

We have the right to change this Privacy Policy to align with changes in the law or changes in technology which have an impact on how we process your Personal Information. We will provide you with the latest version of our Privacy Policy. The latest version will replace previous versions.

## **4. Collection of Personal Information**

Personal Information is collected directly from you (Data Subject) and may be collected indirectly from other external sources for purposes of complying with the law.

Due to the type of service that we provide it is important for us to have a complete view of the Data Subjects that we assist, understand their behaviors and that of their Data Subjects. We need to be proactive and pre-emptive in effectively identifying risks that impacts our Swyft Markets. We may therefore use other sources to find information, sources such as:

- Regulators
- Media sources such as social media
- Members of the public

## 5. The purpose for collection of Personal Information

We collect your Personal Information for a number of reasons including, but not limited to, the following:

- Onboarding
- Invoicing
- Providing of services to clients
- Any other service as governed by a contract or service level agreement.
- Communication
- Marketing

## 6. Personal Information that we collect

We collect different attributes of your Personal Information at specific points of our processes, to fulfil legal requirements and internal business purposes. Some of the information we collect is:

- Identity number (company registration numbers, ID number),
- Email-addresses, physical address, telephone number
- Names, surname, nationalities number, language,
- Education, financial, employment information,

We may not be able to carry out our legislative mandate and provide our services to you or procure your services without your Personal Information.

## 7. Third Parties

We might from time to time share your Personal Information with third parties. We will only disclose your Personal Information when:

- It is necessary to fulfil our mandate in terms of the Service Level Agreement
- For business purposes
- The law requires it
- We have a public duty to disclose the information
- Your legitimate interests require the disclosure
- You Consented to us disclosing the information.

### Third parties may include but not limited to:

- Regulators
- Law enforcement agencies

- Service Providers

We request, where appropriate, the third parties with whom we share information with, to take adequate steps and comply with applicable data protection laws and protect the information disclosed to them. We accomplish this through contractual arrangements with these third parties. We also have internal controls to ensure that the third parties we appoint have appropriate controls to protect the information we provide to them.

If you want to learn more about our internal measures, please contact the Swyft Markets Information Officer.

## **8. Cross Border**

We might transfer information to our service providers outside South Africa.

## **9. Your Rights**

As a Data Subject, you have certain rights that you can exercise in relation to the Personal Information we hold about you. You can exercise your rights to:

- Ask for access to the information we hold about you. We may, if allowed by law, charge for this.
- Request correction and updates to the Personal Information we hold about you.
- Object to the way we use Personal Information about you.
- Request that information be deleted that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully or where we are no longer authorized to keep such information.
- Submit complaints to us about the way we use your Personal Information. If you are not satisfied with how we handle your complaint, you can lodge a complaint with the Information Regulator.

## **10. Security Practices**

The security systems and controls we have implemented are designed to maintain confidentiality, prevent loss, unauthorised access and damage to information by unauthorised parties.

## **11. Retention of Personal Information**

Our Record Management Policy defines how long we keep all types of records, including any Personal Information we process. Personal Information is retained and destroyed as required or authorised by law.

## **12. Access to and Correction of Personal Information**

You may access, amend and correct your Personal Information that we hold about you by sending an email to [info@swyftmarkets.trade](mailto:info@swyftmarkets.trade)

## **13. Physical address:**

Unit C1, First Floor  
Building 3, Northgate Park  
Paarden Eiland  
Cape Town  
8000

## **14. Information Regulator Information**

Address: JD House,

27 Stiemens Street

Braamfontein

Johannesburg, 2001

Email: [enquiries email:enquiries@info regulator.org.za](mailto:enquiries@info regulator.org.za)

Complaints: [POPIAComplaints@info regulator.co.za](mailto:POPIAComplaints@info regulator.co.za)

## 15. Definitions

Consent	Voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Information.
Data Subjects	The person to whom Personal Information relates.
Information officer	The person in the organisation who has been appointed to ensure POPI compliance.
Personal Information	Information relating to an identifiable, living, natural person or juristic person.
Processing	The collection, action, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, and use of Personal Information.

**. Version Control**

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