



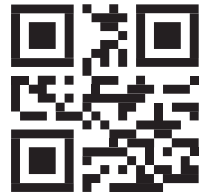
*Empowering the Financial Services Industry.*

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# Website Privacy Policy

**February 2023**

EXCELLENCE



ACCOUNTABILITY



INTEGRITY



COLLABORATION

The Financial Services Exchange (Pty) Ltd | Reg No. 1999/025503/07. **Directors**, O Kaempf (Director & Group CEO), \* M Morojele (Chairperson), \*\* B Eliot, \* J van Zyl, \* L Budhram, \* K Chetty, \* B Viljoen, \* T Mantshimuli, \* P Govender \* *Non-Executive Director*, \*\* *Non-Executive Independent Director*, \* *Alternative Director*

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**For internal use only**

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## 1. General Information

### 1.1. Introduction

Thank you for your interest in our website and our online services. Protecting customers'/visitors'/users' data and using it only in accordance with relevant legislation is our highest priority. Thus, the following Policy is designed to inform you about the processing of your Personal Information and your rights regarding this processing according to the Protection of Personal Information Act No. 4 of 2013 ("POPI") and other data protection laws including the General Data Protection Regulation ("GDPR") where applicable.

### 1.2. Responsible Party

We, The Financial Service Exchange (Pty) Ltd trading as ASTUTE are the Responsible Party according to POPI and therefore responsible for the data processing explained herein.

### 1.3. Responsible Party

You can contact our Information Officer at any time by using the following contact details:

Address: Waterfall Corporate Campus, 74 Waterfall Drive, Midrand, 2090  
Phone : 011 214 0900  
E-mail : mtaylor@astutefse.com

## 2. Processing of Personal Data During Your Use of Our Website

Your visit to our website and/or use of our online services will be logged. The IP address currently used by your device, date and time, the browser type and operating system of your device, the pages accessed and the Internet address of the Web site from which you linked directly to our site may be recorded. This data is collected for the purposes of optimizing and improving our website, analyzing trends as well as administer the Site. The processing is legally based on legitimate interest as it is in our legitimate interest to protect our website and to improve the quality of our services. Additionally, your Personal Information is only stored if you provide it to us on your own account, e.g. as part of a registration, a survey, an online application or for online purchase (performance of a contract). We have taken appropriate measures to ensure that the data provided to us during the registration is adequately protected. These measures include, but are not limited to, encryption, access control, segregation of duties, internal audit etc.

### 2.1. Unsubscribe from our Newsletter Registration

We take care to only communicate relevant and important information to the services you subscribe to in our

newsletters. If you wish, to unsubscribe from our newsletters you can do so by selecting unsubscribe on any newsletter you receive at any time.

## 2.2. Contact Us

You can use the contact details on our website <https://www.astutefse.com/> to contact us for any request. The Personal Information that may be gathered in our contact with you will only be processed for answering your request.

## 2.3. Customer/User Account Registration

You can send an E-mail to [support@astutefse.com](mailto:support@astutefse.com) should you wish to register with Astute. If you create a customer account with Astute, you will not have to send us your Personal Information every time you are using our online services or when you try to access information/materials intended only for registered customers. The Personal Information that you provided in the registration form will only be processed for creating and maintaining your customer account. Your Personal Information will only be stored until you delete your account. If you delete your account, your Personal Information will be deleted without undue delay except where we are legally obliged by law to further store your data. Please note that you will not be able to use your customer account anymore, after it has been deleted.

## 2.4. Cookies

To make your visit to our website more pleasant and to enable the use of certain functions, we may use “cookies” on various pages. Cookies are small text files that are stored on your terminal device. Some of the cookies we use are deleted after the end of the browser session. Other cookies remain on your device and enable us or our partner companies to recognize your browser on your next visit. You can set your browser in such a way that you are informed about the setting of cookies separately and decide individually about their acceptance or exclude the acceptance of cookies for certain cases or generally. For more information, see the help function of your Internet browser. If cookies are not accepted, the functionality of our website may be limited.

To find out more about how we use cookies you can access our “Cookie Policy”

## 2.5. Data Recipients

We may use third party service providers to process your Personal Information. These service providers may be located in or outside of South Africa or in countries within and outside the European Union (EU) and the European Economic Area (EEA). We ensure that these service providers process Personal Information in accordance with European data protection guidelines or legislation to guarantee an adequate data protection level, even if Personal Information is transferred into a country outside the EEA for which no adequacy decision of the EU Commission exists. Transfers of Personal Information to other recipients is not performed, except where we are obliged to do so by law. For more information about appropriate safeguards for the international data transfer or a copy of them, please contact our Information Officer.

## 2.6. Retention Period

Personal Information provided to us via our website will only be stored until the purpose for which it was processed has been fulfilled. Insofar as retention periods under commercial and tax law must be observed, the storage period for certain data can be up to seven years. However, storage periods may also be amended due to our legitimate interest (e.g. to guarantee data security, to prevent misuse or to prosecute criminal offenders).

## 2.7. Your Rights

As a Data Subject, you can contact our Information Officer at any time with a notification under the contact information mentioned above under clause 1.3 to make use of your rights. These rights are the following:

- The right to receive information about the data processing and a copy of the processed data.
- The right to demand the rectification of inaccurate data or the completion of incomplete data.
- The right to demand the erasure of Personal Information.
- The right to demand the restriction of the data processing.
- The right to receive the Personal Information concerning the Data Subject in a structured, commonly used and machine-readable format and to request the transmittance of the data to another controller.
- The right to object to the data processing.
- The right to withdraw a given consent at any time to stop data processing that is based on your consent.
- The right to file a complaint with the competent supervisory authority: The Information Regulator, [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za).

## 3. Validity and Document Management

This document is valid as of 01 April 2021

The owner of this document is the Astute Data Protection Officer, who must check and, if necessary, update the document at least once a year.

Executive: Group Risk and Compliance  
Data Protection Officer  
Michelle Taylor

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[signature]