## **POPI Policy**

## Introduction

Red Pine Capital (Pty) Ltd acknowledges its responsibility and duty to protect the confidential and sensitive information of all its clients and business partners. We are committed to full adherence to the Protection of Personal Information Act of South Africa and confirm that we comply with this legislation. The Board of Red Pine Capital (Pty) Ltd bears the ultimate responsibility of ensuring adherence and implementing procedures and policies.

The POPI Act requires us to

- 1. Sufficiently inform clients of the purpose for which we will process their personal information;
- Protect our Information assets from threats, whether internal or external, deliberate or accidental, to ensure business continuity, minimise business damage and maximise business opportunities.
  This policy and compliance framework establishes measures and standards for the protection and lawful processing of personal information within our organisation.

We have appointed an Information Officer who is responsible for assessments, adherence, implementation and recording of all matters relating to the protection of personal information.

Any service provider that provides information technology services, including data storage facilities, to our organisation must adhere to the requirements of the POPI Act to ensure adequate protection of personal information held by or on our behalf. Written confirmation to this effect must be obtained from relevant service providers.

## POPI Adherence

**Accountability:** We must and have taken reasonable steps to ensure that all personal information obtained from clients is stored safely and securely.

**Process Limitation:** We will collect information directly from clients. Once received – we will only process it with a client's consent.

**Specific Purpose:** We collect personal information from clients to comply with regulatory obligations and to ensure that we provide appropriate services in line with the experience of clients.

**Limitation:** We will not process personal information which is not in line with the purpose for which it was provided.

**Information Quality:** We will ensure the information we receive is accurate and complete. We will discard information which is not required, subject to regulatory retention requirements.

**Transparency:** Where information is collected from sources other than the client, we will disclose to the client the information collected, from which source this information is collected and the reason.

**Security Measures:** We will ensure technical and physical safeguards are in place to protect client's information from loss, theft or damage.



**Participation:** Clients are entitled to know the personal information held by us, those who accessed it and are entitled to correct information held by us.

## For Clients

By creating an account on Trade245 with Red Pine Capital (Pty) Ltd and submitting your information to us you confirm that:

- 1. That you have read and understand this policy;
- 2. That you have no objection to us collecting and processing your information;
- 3. That we may contact you requesting additional information if required;
- 4. That the information you have provided to us is true, correct and up to date.

If you have any questions about our collection or storage of your personal information, please contact us at:

Red Pine Capital (Pty) Ltd Atrium on 5th, Floor 9 5th Street Johannesburg, 2196

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