

*Relentlessly*

committed to **protect**  
and **grow** your savings

## Privacy Policy



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**Granate Asset Management (Pty) Ltd**

is an authorised Financial Services Provider (FSP 46189) Reg No. 2015/090537/07

## Version Control

Version no.	Update date	Purpose of changes*	Details of revisions to document
1.0	9 June 2021	N/A	First draft of document
2.0	16 March 2022	Ad hoc update	Stylistic, grammatical, and plain language review

\* for example: Annual policy and procedures review, changes in legislation and ad hoc update

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## Introduction

This policy explains how Granate Asset Management (Granate) processes your personal information according to the requirements of the Protection of Personal Information Act, No. 4 of 2013 (POPIA). We are committed to protecting your privacy and making sure that your personal information is processed properly, lawfully and transparently.

This policy explains the steps taken to protect personal information collected on our website ([www.granate.co.za](http://www.granate.co.za)) and describes:

- the type of personal information we collect;
- how it is used;
- your rights regarding your personal information;
- our security measures; and
- how you can review, object to or correct your personal information held by us.

We encourage everyone who interacts with us to read our Privacy Policy. By using our website, investing with us or submitting personal information to Granate by any other means, you acknowledge that you understand and agree to be bound by this policy. You also agree that Granate may collect, process, transfer, use and disclose your personal information as described in this policy.

If you do not agree with any part of this policy, please do not invest with us.

## Personal Information

### What is personal information?

We have included the full definition contained in POPIA below:

“Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to-

- a. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b. Information relating to the education or the medical, financial, criminal or employment history of the person;
- c. Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d. The biometric information of the person;
- e. The personal opinions, views or preferences of the person;
- f. Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g. The views or opinions of another individual about the person; and

- h. The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

In short, personal information is any information that can be used to personally identify a natural or juristic person. If any information we collect can personally identify you or a juristic person — or if you or a juristic person are reasonably identifiable from it — we will treat it as personal information.

### **What personal information do we collect?**

On the Granate website, we may ask you for personal information to provide a service or carry out a transaction you request. The main purpose for collecting this information is to understand your requirements and to make our services meet them. If you provide us with personal information of third parties, please make sure that you are authorised to do so.

The personal information we collect directly from you, includes the following categories:

- contact details, such as your email address and contact number;
- feedback from you about products and services you need information on; and
- your enquiries about and transactions in our funds.

Unless you have previously sent us written consent to process it, you should not submit any special personal information to Granate that relates to your:

- racial or ethnic origin;
- political beliefs;
- philosophical or religious beliefs;
- membership of a trade union or political party;
- physical or mental health or genetic makeup;
- sexual life; or
- the commission of criminal offences or proceedings and associated penalties or fines.

If you have not given us consent to process special personal information and you provide such information, we will promptly delete it.

We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information is required and what information is optional. When we collect personal information directly from you, you will know the precise information being collected. Granate does not collect personal information from any other sources, except where it may be automatically collected as described in the section related to 'cookies'.

### **Why do we collect your personal information?**

Granate will use your personal information only for the purposes for which it was collected and agreed with you. Unless stated specifically otherwise, the information may be used for the following purposes:

- to administer a service to you;
- to gather contact information; and
- to respond to your requests.

We may use your personal information to inform you of products or services available from Granate. When collecting information that might be used to contact you about our products and services, we give you the opportunity to opt out from receiving such communication. In addition, each email communication we send includes an unsubscribe link, allowing you to stop delivery of that type of communication. If you choose to unsubscribe, we will remove you from the relevant mailing list within 14 business days.

Granate does not sell, re-sell or distribute your personal information for re-sale.

## What do we do with your personal information?

### **Disclosure of information**

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to make sure that they comply with the POPIA privacy requirements.

We may also disclose your information:

- where we have a duty or a right to disclose it in terms of law or industry codes; or
- if we believe it is necessary to protect our rights.

### **Retention of data**

Granate will retain personal information only for as long as is necessary for the purposes set out in this policy. This will include but is not limited to the statutory requirements imposed so that our clients can submit and track data subject access requests. We will also retain and use personal information to the extent necessary to comply with our legal obligations, resolve disputes or make sure that legal agreements and policies are enforced.

### **Direct marketing communications**

Granate may communicate with you using email and other channels as part of our efforts to market our products or services, administer or improve our products or services, or for other reasons not stated in this policy. You can withdraw consent to receive such direct marketing communications.

If you no longer want to receive this correspondence, you can opt out or unsubscribe by clicking on the relevant link in any email communication you receive. You can also inform us of your communication preferences by contacting us using the contact information in this policy.

## Your rights

### **Access to information**

You have the right to request a copy of the personal information we hold about you. To do so, please use the contact details set out at the bottom of this policy and specify what information you need. We will require a copy of your identification document to confirm your identity before we will release this information.

We will try to provide you with a suitable way to access the requested information if you are entitled to it. Please note that such requests may be subject to a legally allowable fee. There may also be instances where we cannot grant access to your personal information. If this is the case, we will give written reasons for the refusal.

### **Updating, correcting or deleting your information**

You have the right to ask Granate to update or correct your personal information. We will require a copy of your identification document to confirm your identity before we will do so.

If you believe that any personal information we hold about you is excessive or has been unlawfully obtained, or that we are no longer authorised to hold it, you can ask us to destroy or delete it. If we do not agree that there are grounds for action, you can ask us to add a note to the personal information stating that you disagree with it. You can make these requests by sending an email to the email address at the bottom of this policy.

You can help us to keep your personal information accurate by notifying us of any change to your phone number or email address.

### **Objecting to the processing of personal information**

If you want to object to Granate processing your personal information, you can contact us by sending an email to the email address at the bottom of this policy.

### **Complaints to the Information Regulator**

If you want to make a complaint to the Information Regulator about Granate processing your personal information, you need to complete Form 5 on its website. The Information Regulator's details are as follows:

The Information Regulator  
PO Box 31533  
Braamfontein  
2017

Complaints:  
[Complaints.IR@justice.gov.za](mailto:Complaints.IR@justice.gov.za)

General information:  
[infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

## **Our website**

### **Cookies, device data and how we use them**

Cookies are small files that websites save to your hard disk or to your browser's memory. A cookie contains limited information, usually a unique identifier and the name of the website.

When you use our website, we may use cookies to:

- track how many times you have visited the site;
- track the total number of visitors to the site;
- track your activity within the site;
- identify unique identifiers associated with your device;
- store data you provide; and
- store technical information related to interactions with the website.

Our cookies can only be read by Granate. They do not contain any code or viruses and they do not contain any personal information.

We may automatically collect the following information about your use of the website through cookies, web beacons and other technologies:

- your domain name;
- your browser type and operating system;
- web pages you view;
- links you click;
- your IP address;
- the length of time taken to visit our website; and
- the referring URL or webpage that led you to our website.

We may also use session cookies, which are deleted when you close your browser. These cookies store your user identification, facilitate your movement around the website and store other information useful in administering the session.

You can modify your browser settings to decline cookies or to notify you when a cookie is being placed on your computer or device. If you choose not to accept cookies, you may not be able to experience all the features of our website.

### **Links to other websites**

Our website may contain links to other websites, including those of other companies, professional and government organisations, and publications. Although we try to link only to websites that share our high standards and respect for privacy, we do not control and are not responsible for the content, security or privacy practices employed by other websites.

Each linked site maintains its own independent privacy and data collection policies and procedures. We encourage you to view the privacy policies of these other sites before providing any personal information.

You hereby acknowledge and agree that Granate is not responsible for the privacy practices, data collection policies and procedures, or the content of third-party sites. In addition, you hereby release Granate from any and all claims arising out from or relating to the privacy practices, data collection policies and procedures, or the content of such third-party sites.

## Security

Granate is committed to protecting the security of personal information. While no security measures can guarantee against compromise, we use a variety of security technologies and procedures to help protect data from unauthorised access, use or disclosure.

We will continually review our security controls and related processes to make sure that your personal information remains secure.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to make sure that the personal information we remain responsible for is kept secure.

We will make sure that anyone we pass your personal information on to agrees to treat it with the same level of protection as we are obliged to.

## Changes to this policy

We may occasionally update this policy. When we do, we will revise the 'last updated' date set out on the first page. We encourage you to revisit this page periodically to become aware of any changes.

## Contact us

If you have questions about this policy or our handling of personal information, please contact us using the details below:

Email: [info@granate.co.za](mailto:info@granate.co.za)

Phone: +27(21) 276 3450