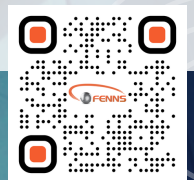




PRIVACY POLICY

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THE PROTECTION OF PERSONAL INFORMATION ACT CLIENT PRIVACY NOTICE

Updated: 30 September 2025

At Fenns Incorporated we are committed to protecting your privacy and ensuring that your personal information collected will be used appropriately, lawfully and transparently.

This document describes the manner at which we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA"). According to the Act, 'Personal Information' is: the information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Moreover, Fenns Incorporated also includes the following items as personal information: all addresses (including residential, postal and email addresses) and marriage certificate or official change in name document (issued by the government) for the purpose of change of name.

Information collected:

We, Fenns Incorporated, may request the following information from our clients or potential clients, this includes but is not limited to:

- Your name, address and contact details (for example your contact number and/or email address);
- Information about your identity (such as date of birth, identity document and/or driver's license);
- Information regarding your personal particulars (for example age, gender, marital status and occupation);
- Information about your financial affairs (for example payment details, banking details, tax related information, etc.)
- Information about entities connected to you (for example entity name, registration number, address information, director, shareholder and member information).

*** We do not necessarily collect all of this information from every client, only where it is necessary to perform our functions and responsibilities.*

Visitations to our offices:

Upon visitation we may request and collect the following information (not limited to):

- Full names
- Company details
- Identity numbers
- Contact details
- Tax details

*** All in accordance to the Disaster Management Act.*

This information will be directly requested from you (in person or via email), where applicable it shall be made known which information is required and which are optional.

How we use your information

Your personal information will be used for the purposes for which collected and agreed upon by you. Further more, where necessary, your information may be used for research as well as be retained for legal purposes.

Your information may be used for but not limited to the following:

- To gather contact information;
- To communicate and manage our relationship with you;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For the detection and prevention of fraud, crime, money laundering and/or other malpractices;
- To conduct market or customer satisfaction research or for statistical analysis;
- For record keeping and other administrative purposes, as required by law;
- In connection with legal proceedings.
- Website and/or app usage information may be collected using “cookies” which allows us to collect standard internet visitor usage 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 ensure that they comply with the privacy requirements of the Protection of Personal Information Act.

Moreover, we may also disclose your information where:

- We have a duty or a right to disclose in terms of law or industry codes;
- We believe it is necessary in order to protect our rights.
- You would reasonably expect us to use the information for a particular purpose;
- It is legally required or authorised, such as by a law, or a court or tribunal order;
- It is reasonably necessary for an enforcement-related activity;
- We reasonably believe that it is necessary in order to lessen or prevent a serious threat to a life or to the health and safety of any individual at risk;
- We suspect unlawful activity or serious misconduct relating to our operations, and reasonably believe action is required, we may respond appropriately.
- It is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim;
- The information is used only for historical, statistical or research purposes and will not be published in an identifiable form.

Storage and data security

We respect and protect your privacy and store personal information in line with generally accepted security practices. We take reasonable steps to safeguard personal information against loss, unauthorised access, use, modification, disclosure, or misuse, including the following measures:

- When personal information is no longer required (whether due to expiry of the 7-year retention period, client termination, outdated documents, or lack of legal requirement) it will be securely deleted or destroyed, unless retention is otherwise required.
- In the event of a personal information breach, we will notify the Information Regulator and the affected individuals as required, and provide timely guidance to help manage any potential loss (financial and or otherwise).
- When contracting with third parties, we impose security, privacy, and confidentiality obligations to ensure that personal information for which we remain responsible is protected.
- Unless we have your clear informed consent or the law clearly allows us in certain limited circumstances, we will not:
 - Sell or rent personal information;
 - Provide personal information to anyone unless consent has been granted.
 - Use personal information for purposes that are different, unusual or unexpected in relation to the reason for collecting it in the first place or as stated within this document; or
 - Share your personal information with third parties in circumstances other than the ones we have referred to with this document.

Your Rights:

- You have the right to request and view a copy of the personal information we hold about you. To do this, simply contact us at the numbers/addresses as provided on our contact page at the end of this document and specify what information you require.
- You have the right to ask us to update, correct or delete your personal information (provided that we do not require this information for the purpose of providing the functions and responsibilities as required).

*** Please note: In order to receive any of your personal information, we may require proof of identity in the form of a copy of your ID document or passport.*

Updates to personal information are to be communicated to our offices timeously so that our records (and those of the relevant governing/statutory bodies) can be updated.

Furthermore, if you have any queries regarding this document, or require further information; wish to withdraw consent; exercise preferences or access or correct your personal information, please contact us by using the contact details listed at the end of this document.

Company Details

Company name: Fenns Incorporated

Registration no.: 2005/031820/21

Email: office@fenns.co.za

Telephone: 086 10 FENNS (33667)

Website: www.fenns.co.za

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