



HIGH STREET
ASSET MANAGEMENT

PRIVACY POLICY

AUGUST 2022

TABLE OF CONTENTS

1. What Personal Information Does The Company Require?	3
2. Why Does The Company Require Your Personal Information?	4
3. How Is Your Personal Information Processed?	4
4. How Long Does The Company Keep Your Personal Information?	4
5. What Are Your Rights?	5

1. WHAT PERSONAL INFORMATION DOES THE COMPANY REQUIRE?

1.1. High Street Asset Management ("the Company")'s Personal Information Protection Policy governs the Processing of your Personal Information. You may view the Personal Information Protection Policy by contacting the Information Officer on Ross@hsam.co.za or on 011 325 4006.

1.2. "Personal Information" is defined in the Protection of Personal Information Act (Act no. 4 of 2013) ("POPIA") as follows:

"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, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;
- (b) information relating to the education or the medical, financial, criminal, or the 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."

a. "Processing" is defined in POPIA as follows:

"Any operation or activity or any set of operations, whether by automatic means, concerning personal information, including—

- (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use.
- (b) dissemination by means of transmission, distribution or making available in any form; or
- (c) merging, linking, as well as restriction, degradation, erasure or destruction of information;"

b. The Company is a Responsible Party in respect of the Personal Information you (Data Subject) provide to the Company. The Company processes the following types of Personal Information from you:

- i. Identification document
- ii. Proof of residential / business operating address
- iii. South African Income Tax registration number
- iv. South African VAT registration number (if applicable per individual/legal entity)
- v. Contact numbers
- vi. E-mail addresses
- vii. Banking details

- viii. Source of Wealth
- ix. Marital status
- x. Town and country of birth

2. WHY DOES THE COMPANY REQUIRE YOUR PERSONAL INFORMATION?

- a. This Personal Information is required in terms of the Financial Intelligence Centre Act, 38 of 2001 and the Company's Risk Management and Compliance Programme. The Personal Information forms part of the Company's requirements when assisting with the relationship between the investor and the fund administrators and to be able to assist with any future queries arising between the investor and the fund administrator.
- b. The Company needs your Personal Information to provide you with the following services:
 - i. To assist in the establishment of a legal relationship between the investor and the fund administrators.
 - ii. To assist the investor with populating of the application forms belonging to the fund administrators.
 - iii. To generate statements and assist with any queries the investor may have with the fund administrators.

3. HOW IS YOUR PERSONAL INFORMATION PROCESSED?

- a. Your Personal Information is Processed at The Offices of Hyde Park, 1 Strouthos Road Hyde Park. Storage of your Personal Information is electronic on the High Street Asset Management's CRM system "Advice Tech" "Advice Tech" is POPIA compliant. Information is also stored on One Drive and has all the Microsoft Security Features related to One Drive.
- b. No third-party providers have direct access to your Personal Information unless specifically required by law and to satisfy client due diligence principles.
- c. In order to assist with the relationship between the investor and the Fund administrator HSAM may be required to transfer personal information relating to an investor to a third party recipient(s) in a foreign country (namely Ireland or Switzerland) in the ordinary course of business.
- d. Your Personal Information is shared with the following: Bidvest Bank Ltd, Prescient Fund Services, Prescient Fund Services Ireland, Northern Trust, Sanlam Ireland and Brown Brothers Harriman Ireland, Julius Baer (Switzerland), Bonhote Bank (Switzerland) Nedbank Private Wealth and Nedbank CIB to assist with the relationship between the investor and the Fund administrator.

4. HOW LONG DOES THE COMPANY KEEP YOUR PERSONAL INFORMATION?

- a. Under South African law, the Company is required to keep your Personal Information for a five (5) year period following the date of termination of the business relationship according to the Company's Personal Information Retention Policy. After this period, your Personal Information will be irreversibly destroyed. For more information on the Company's Personal Information retention schedule, please refer to our Personal Information Retention Policy which can be accessed at by contacting Ross@hsam.co.za or Jo-Ann@hsam.co.za.

5. WHAT ARE YOUR RIGHTS?

- a. Should you believe that any of your Personal Information held by the Company is incorrect or incomplete, you have the right to request to view this information, rectify it or have it deleted. Please contact the Company's Information Officer on Ross@hsam.co.za should this be required.
- b. In addition, if you wish to complain about how the Company has handled your Personal Information, please contact the Information Officer on Ross@hsam.co.za.
- c. The Company's Compliance Department will investigate your complaint and contact you within two (2) business days of the complaint being lodged and work with you to resolve the matter.
- d. If your query relating to your Personal Information is not, in your opinion, adequately dealt with, you can contact the Information Regulator on 012 406 4818 or infoereg@justice.gov.za to file an official complaint.