

## POPIA COMPLIANCE AND PRIVACY NOTICE

### 1. INTRODUCTION

The right to privacy is an integral human right recognised and protected in the South African Constitution and the Protection of Personal Information Act 4 of 2013 (“POPIA”).

POPIA aims to promote the protection of privacy by providing guiding principles that are intended to be applied to the processing of personal information in a context-sensitive manner.

Through the provision of quality goods and services, the organisation is necessarily involved in the collection, use and disclosure of certain aspects of the personal information of clients, customers, employees and other stakeholders.

A person’s right to privacy entails having control over his or her personal information and being able to conduct his or her affairs relatively free from unwanted intrusions.

The aim of this compliance and privacy notice is to demonstrate our commitment to safeguarding your personal information and to notify you how and why we collect information from you, the way we use your information and how we share or disclose your information, as required in terms of POPIA.

This Notice provides you with the following information:

- Our commitment to compliance;
- A summary of the compliance measures implemented;
- A notification on the collection of personal information and how we use the information;
- Your rights as a data subject;
- How to contact us in relation to this notice.

### 2. COMMITMENT TO COMPLIANCE WITH POPIA

Given the importance of privacy, Levantine and Co (Pty) Ltd (“Levantine & Co”) is committed to effectively managing personal information in accordance with POPIA’s provisions. To meet the requirements of POPIA, Levantine & Co has drafted a POPIA Risk Framework which includes:

- Development and implementation of Information processing plan and procedures, including the safeguards of personal information required under POPIA
- Development and implementation of a compliance monitoring plan
- Appointment of Information Officer
- Delegation of duties to staff and training on their duties
- Development of disclosures and client POPIA engagement processes
- Documentation of relationships with third parties on the sharing of personal information and/or service agreements for the outsourcing of certain POPIA obligations

### **3. INFORMATION OFFICER**

Levantine & Co has appointed Laurent Joly as its Information Officer. All correspondence to the Information Officer may be submitted via e-mail to [laurent@levantine-co.com](mailto:laurent@levantine-co.com). Aneen Bewick has been appointed as the Deputy Information Officer and can be contacted at [aneen@levantine-co.com](mailto:aneen@levantine-co.com).

### **4. PRIVACY STATEMENT**

1. If you cancel your services with Levantine & Co we will delete or otherwise de-identify your personal information after the minimum storage periods required under our risk and statutory record-keeping periods have expired.
2. We take measures to ensure data is kept safe and prevent loss of, damage to, or unauthorized destruction of personal information, and unlawful access to or processing of personal information.

### **5. COLLECTION AND PROCESSING NOTIFICATION**

Levantine & Co collects personal information directly from our data subjects where possible. In addition to the aforementioned, we shall, subject to your consent, or to execute our service agreement with you, obtain further information required from third parties and other sources where necessary.

During our typical service delivery, we process personal information as follows:

**DIRECTORS** LAURENT JOLY, CFA | ATTILA KADIKOY  
**LEVANTINE & CO. (PTY) LTD** 27 Sagewood Drive, Berg En Dal Estate, 7806 Hout Bay, Cape Town

+27 (0)21 813 6205  
[info@levantine-co.com](mailto:info@levantine-co.com)  
[www.levantine-co.com](http://www.levantine-co.com)

Information being collected	Name, Surname, Gender, Identity number, Nationality, Contact information (residential address, postal address, email, telephone number, Curriculum Vitae, Academic records, qualifications, references from previous Responsible parties, performance information, bank account details, salary information, number of dependants, competence requirements, reference check, criminal checks.
Source of information	We collect personal information directly from you, as the data subject, during the application process. From time to time, we may also update or verify this information to ensure that it remains accurate and up to date.
Purpose of processing information	The personal information and special personal information processed during the data subject engagement process is used to render services to the data subject directly related to the service agreement in place between the parties.
Voluntary/Mandatory provision of information	The Data subject is required to provide the information on a voluntary basis and understand that certain information is mandatory for the purpose of administration of the Responsible party-Data subject relationship.
Requirement to process in terms of legislation	The Responsible party may be required to collect personal information in terms of the following legislation: <ul style="list-style-type: none"> <li>• The Financial Intelligence Centre Act (FICA)</li> <li>• The Financial Advisory and Intermediary Services Act (FAIS)</li> <li>• The Protection of Personal Information Act (POPIA)</li> </ul>
Consequences of failure to provide information	Failure to provide the information will result in the Responsible party failure to comply with the requirements in terms of the service agreement and legislative requirements.
Cross border transfer	Where necessary information may be shared with organisations outside South Africa for legitimate purposes who subscribe to similar personal information protection laws. Information shall not be shared with countries that do not subscribe to personal information protections laws unless the Responsible party has entered into an agreement in terms of which the third party subscribes to the obligations for lawful processing of

	personal information.
Recipients of personal information	<p>The Responsible party shall only share information outside of the information in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Government organisation to comply with the Responsible parties obligations in terms of the various legislation that regulates the Responsible party-Responsible party relationship.;</li> <li>• Services providers that assist the Responsible party to administer the service agreement between the Parties or necessary to assist the Responsible Party to meet its legal and contractual obligations to the data subject.</li> </ul>
Nature and category of information	The Responsible party processes personal information, special personal information and information of the Data subject's dependants according to the lawful conditions for processing of personal information.

Levantine & Co does not collect and process special personal information unless it is a requirement by law to process such information as part of our service delivery, in which case we shall obtain consent from you before collection thereof. We do not knowingly collect personal information from children (under 18 years of age) without the permission of their parent/s or guardian.

Levantine & Co and its employees may disclose personal information: to other services providers involved in the rendering of services or the provision of products to the clients; to services providers, it is in engaged with such as accountants, compliance officers, administration etc.; if Levantine & Co has a duty or a right to disclose same in terms of law or certain industry codes; or if it is necessary to protect Levantine & Co's legal rights and interests. We undertake to review and update our security measures in accordance with future legislation and technological advances. Access to client data from within our organisation is limited to essential staff or specialist contractors that are required to access our systems for client service or maintenance purposes, who are bound by the requirements of the legislation and are required to maintain safety and security measures. Levantine & Co will not transfer personal information to a third party in a foreign country without ensuring that it complies with the provisions of POPIA.

## 6. COOKIES

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Levantine & Co uses cookies to help identify and track visitors, their usage of the Levantine & Co service, and their website access preferences. Levantine & Co visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Levantine & Co websites, with the drawback that some features of Levantine & Co websites may not function properly without the aid of cookies.

## 7. REQUEST TO ACCESS PERSONAL INFORMATION PROCEDURE

In terms of POPIA, data subjects have the right to:

- Request what personal information the organisation holds about them and why.
- Request access to their personal information.
- Be informed on how to keep their personal information up to date.

Access to information requests can be made by email, addressed to the Information Officer. The Information Officer will provide the data subject with a "Personal Information Request Form".

Once the completed form has been received, the Information Officer will verify the identity of the data subject before handing over any personal information. All requests will be processed and considered against the organisation's PAIA Policy.

The Information Officer will process all requests within a reasonable time.

## 8. POPIA COMPLAINTS AND OBJECTIONS PROCEDURE

A data subject has a right to object to the use of personal information, however in certain instances failure to provide us with personal information may result in the inability to deliver said services or products to our data subjects, or our data subjects shall receive limited services or have a limited engagement with us.

Data subjects further have the right to complain in instances where any of their rights under POPIA have been infringed upon. The organisation takes all complaints very seriously and will address all POPIA related complaints in accordance with the following procedure:

- POPIA complaints and objections must be submitted to the organisation in writing. Where so required, the Information Officer will provide the data subject with the prescribed form.
- The Information Officer will provide the complainant/objector with a written acknowledgement of receipt of the complaint.
- The Information Officer will carefully consider the complaint or objection and amicably address the complainant's concerns. In considering the application, the Information Officer will endeavour to resolve the matter in a fair manner and in accordance with the principles outlined in POPIA.
- Where the data subject is not satisfied with the Information Officer's suggested remedies, the data subject has the right to complain to the Information Regulator.

The Information regulator's contact details are as follows:

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

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

#### Policy Changes

This notice was last revised on 23 April 2026. Any material changes hereto will be published on our website or distributed to clients in writing.



Laurent Joly \_\_\_\_\_