



**BELLAMONT**

## **PROTECTION OF PERSONAL INFORMATION POLICY**



## INTRODUCTION

1. Personal information is information that can be related to an identifiable natural person or, to the extent applicable, a juristic person (known as a “data subject”)
2. Protection of personal information is enshrined in the Constitution of South Africa, and this policy aims to give effect to this right by regulating the way Bellamont Asset Managers (Pty) Ltd processes personal information.
3. Processing of personal information refers to any activity concerning personal information including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.
4. Bellamont Asset Managers (Pty) Ltd (“Bellamont”) is an authorised financial services provider whose business. Bellamont Asset Managers (Pty) Ltd was founded on a fundamentally different philosophy to traditional wealth managers and financial advisory firms, specifically on the principle of being prepared to go above and beyond. Just under a decade ago, the founding partners sought to create a wealth manager that offered the highest standard of personal service, endeavouring to deliver strong investment performance by capturing the expertise and best processes found in many of the larger investment houses. As an independent wealth management company, owned 100% by the founders, the desire to succeed is inherent in our service delivery and having custody of our clients’ assets is taken very seriously. We are free from any external influences typically prevalent in big firms and can continue to operate in ways that are meaningful to our clients. Our aim is to work hand-in-hand with our clients to take a complex subject and make it comprehensible. In this way, informed and well considered decisions can be made with confidence and capital is protected for generations to come. It often takes a lifetime to create real wealth and, managed appropriately, this can become inter-generational. Everything we do is bespoke and personal. We have built a team that aspires to be excellent in everything that we do, whilst always looking to retain a degree of humility, because there is always something to learn. Most importantly, we want to enjoy what we do every day and work with like-minded people, and clients who want and value our advice. We do not sell anything. We recognise that all families have different requirements – some can be very simple, some can be somewhat more complex. We understand the subtleties within families and build a rigorous framework and flexibility within their finances for each generation to make the most appropriate decisions. Listening to our clients over the years and curating a framework that simplifies complex matters is the cornerstone of our bespoke solution. Bellamont may therefore need to collect personal information from its clients to comply with applicable law and/or to render efficient and effective services.
5. Bellamont, as the responsible party, is committed to principles of accountability, transparency and consensual and responsible processing of personal information.
6. It is the intention of Bellamont that this policy will protect a client’s personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.



## PURPOSE OF PROCESSING PERSONAL INFORMATION

1. Personal information is processed for the following purpose(s):
  - To adhere to government regulations and legislation; and
  - To place investments on behalf of our clients.
2. Any further processing of data must be compatible with the purpose(s) for which the information was collected.
3. Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, are stored in archives for record-keeping and backup purposes only. Iress, Xplan systems are used for storing FICA and FAIS documents.
4. Documents are shared with 3rd parties for establishing business relationships with clients.
5. Bellamont Asset Managers (Pty) Ltd will not, without an individual's consent, share information with any other third parties, for any purposes whatsoever, without written consent by the person to whom the personal information relates.
6. Personal information is used when opening up Credo Wealth, Momentum Wealth and Currency Partners investment accounts.
7. Personal information is processed when clients are onboarded as clients
8. Information is deleted from our systems should the mandate held be terminated.

## OBTAINING PERSONAL INFORMATION

1. Personal information is acquired with the consent of the data subject, which consent can be withdrawn at any time by notification to Bellamont.
2. As far as possible, personal information is collected directly from the data subject.
3. Bellamont is committed to ensuring the accuracy of the personal information collected and uses the following measures to verify:

Originals of all FICA documentation are obtained, and copies are made and certified at our office by our Commissioner of Oaths.

## STORAGE AND SECURITY OF PERSONAL INFORMATION

1. Bellamont strives to ensure the security, integrity and privacy of personal information submitted. Bellamont will review and update its security measures in accordance with legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, Bellamont will endeavour to take all reasonable steps to protect the personal information, which an individual submits to Bellamont or to Bellamont's online products and services. Bellamont will always set the highest standards to ensure the integrity of their systems.
2. Bellamont may engage with other organisations to provide support services to Bellamont. Third Parties are obliged to respect the confidentiality of any personal information held by



Bellamont. A service level agreement is in place with all Third parties to ensure adherence to all privacy policies.

3. Bellamont's employees are obliged to respect the confidentiality of any personal information held by Bellamont. All employees are required to sign an employment contract which includes a confidentiality clause.
4. Bellamont will not reveal any personal information to anyone unless:
  - It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law;
  - It is in the public interest to prevent financial loss;
  - Bellamont needs to do so to protect their rights.
5. Bellamont Ltd endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date.
6. Bellamont employed the following security measures to ensure the privacy and integrity of the personal information collected -
  - All FICA docs are stored on the IRESS system (XPlan), which has security measures in place; and
  - We make use of security software, cybersecurity.
7. If at any time, an individual discovers that information gathered about them is incorrect, they may contact Warren Quin at using the contact details below to have the information corrected.
8. Bellamont will not retain and/or store personal information longer than is necessary given the purpose for which the personal information was collected except for historical, statistical and research purposes and then only with suitable safeguards in place to ensure the privacy and integrity of the personal information.

## BREACH OF SECURITY

1. Bellamont undertakes to ensure reasonable organisation and technical measures are in place to prevent, insofar as possible, any infringements on the privacy and integrity of personal information.
2. In the event of a breach of security Bellamont undertakes to notify the Regulator and the data subject in writing as soon as possible of any breach of security.
3. Notification to the data subject shall be done via mail to the data subject's last known physical or postal address/e-mail to the data subject's last known e-mail address/publication on Bellamont's website/publication in the news or media or as directed by the Regulator.

## TRAINING

As part of its commitment to ensuring organisation wide compliance with this policy, Bellamont implements annual training for all staff members of Bellamont.



## INFORMATION OFFICER/CONTACT DETAILS

Any questions relating to Bellamont's privacy policy, or the treatment of an individual's personal data should be addressed to the Information Officer, whose contact details are:

### INFORMATION OFFICER

- **Head Office Physical Address:** Mill House, Boundary Terraces, 1 Mariendahl Road, Newlands, Cape Town, 7700;
- **Head Office Postal Address:** Mill House, Boundary Terraces, 1 Mariendahl Road, Newlands, Cape Town, 7700;
- **Telephone Number:** +27 (21) 1006170;
- **E-mail:** [clientservices@bellamontgroup.com](mailto:clientservices@bellamontgroup.com);
- **Website:** [www.bellamontgroup.com](http://www.bellamontgroup.com);
- **Information Officer:** Warren Quin;
- **Telephone Number:** +27 (21) 100 6170; and
- **E-mail:** [Warren@bellamontgroup.com](mailto:Warren@bellamontgroup.com).