



Privacy Notice

Contents

Introduction	2
Applicability	2
Collection of personal information	2
How we use your information	3
Disclosure of personal information	4
Personal information security	4
Access to your personal information	4
Correction of your personal information	5
Definition of personal information	5
Changes to this notice	5
How to contact us	5

Introduction

The Protection of Personal Information Act 2013 (“POPI Act”) commenced on 1 July 2020 in South Africa, with a 12-month transitional period. If you are a natural person resident in South Africa or a juristic person resident in South Africa contracting and/or connected to a juristic person contracting with us, this Privacy Notice may apply to you.

We respect the privacy of our clients and potential clients. We are committed to protect your privacy and to ensure that your personal information is collected and used properly, lawfully and openly.

We recommend that you read this Privacy Notice so that you understand our approach towards the use of your personal information. It explains how we obtain, use and disclose your personal information, as is required by the POPI Act. By submitting your personal information, you are giving your permission – where necessary and appropriate – for us to use such information for disclosures referred to in this Policy.

As this Privacy Notice is published on our website (for ease of access to you) it forms part of our Website Terms and Conditions of Use and is governed by and construed in accordance with the laws of South Africa.

Applicability

This Privacy Notice applies to Pi Investment Managers (Pty) Ltd (“Pi Invest”). Pi Invest is a licensed financial services provider with FSP No. 20293.

All references herein to Pi Investment Managers, Pi Invest, we, our or us, shall be deemed, unless otherwise stated, to include Pi Investment Managers (Pty) Ltd.

Collection of personal information

We collect and process your personal information mainly to provide you with access to our services and products, to help us improve our offerings to you and other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you invest into our funds or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide and what information is optional.

Examples of information we collect from you are, but not limited to:

- name;
- address;
- email address;
- telephone/cell phone number; and
- user-generated content, posts and other content you submit to our website.

How we use your information

We will use your personal information only for the purposes for which it was collected or agreed with you, for example*:

- To confirm and verify your identity or to verify that you are an authorised customer for security purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To notify you about changes to our service.
- For market research purposes.
- To assist with business development.
- For the detection and prevention of fraud or crime.
- To conduct market or customer satisfaction research or for statistical analysis.
- For audit and record keeping purposes.
- In connection with legal proceedings.
- To comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when law otherwise allows it.
- For monitoring and auditing site usage.
- Evaluate the use of the site, products, and services.
- Analyse the effectiveness of our advertisements.
- To contact you regarding products and services which may be of interest to you, provided you have given us consent to do so, or you have previously requested a product or service from us, and the communication is relevant or related to that prior request and made within any timeframes established by applicable laws.
- Suggest products or services (including those of relevant third parties) which we think may be of interest to you.
- You can opt out of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out.
- To respond to your queries or comments.
- Where we collect personal information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction, when we delete information from our services, we may not immediately delete residual copies from our servers or remove information from our backup systems.
- In respect of our website:
 - To personalise your website experience, as well as to evaluate (anonymously and in the aggregate) statistics on website activity, such as what time you visited it and what site referred you to it.
 - Make our website easier to use and to tailor the website and our products to your interests and needs.
 - Help speed up your future activities and experience on the website.
 - Collect information about the device you are using to view the website, such as your IP address or the type of Internet browser or operating system you are using, and link this to your personal information to ensure that the website presents the best web experience for you.

Note: This list is not exhaustive. The purpose your information processed will depend on the product you select to invest in.

Disclosure of personal 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 these privacy terms.

We may share your personal information with, and obtain information about you, from:

- Third parties for the purposes listed above; and
- Other third parties from whom you have chosen to receive marketing information.

We may also disclose your information:

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

Personal information security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We review our security controls and related processes on an on-going basis to ensure that your personal information is secure.

We are committed to being at the forefront of information security to protect the privacy and confidentiality of your personal information. We take every reasonable step to protect your personal information, including the use of encryption technology. We can, however, not guarantee the security of any information you transmit to us electronically and you do so at your own risk.

Only authorised Pi Invest employees or agents will have access to your personal information. All of our employees, service providers and marketing partners are held to stringent standards of privacy and security and are bound by confidentiality agreements.

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

Access to your personal information

You have the right to request a copy of your personal information that we hold. To do this, simply contact us at the numbers/addresses listed in the contact us section of our website and specify what information you need. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee, as laid down in our POPI Act Policy or PAIA Manual.

Correction of your personal information

You have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before making changes to the personal information we may hold.

We kindly request that you take the necessary steps to keep your personal information accurate and up to date by notifying us of any changes timeously.

Definition of personal information

According to the POPI Act “**Personal Information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

Changes to this notice

Please note that we may amend this Notice from time to time. Please check our website periodically to inform yourself of any changes.

How to contact us

Please contact us at the numbers/addresses listed in the contact us section of our website if you:

- have any queries about this notice or believe we have not adhered to it; or
- need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information.

If you have any questions about this Policy, please email us on queries@piinvest.co.za.