

Elysian Wealth Partners (PTY) LTD

Protection Of Personal Information Policy

March 2025

Created:	01/03/2025	Version: 1.0
Last reviewed / updated:	01/03/2025	Version: 1.0
Next review date:	01/01/2026	Version: 2.0
Policy owner	Operations Manager	
Approved by	BOD	

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1. Introduction and Scope of Policy

Elysian Wealth Partners (Pty) Ltd ("Elysian", "we", "us", or "our"), Registration Number 2020/194927/07, is an authorised Financial Services Provider (FSP Number: 51505) committed to upholding the highest standards of privacy, transparency, and data protection. This Personal Information Policy outlines our commitment to protecting your personal data and sets out the principles we apply when processing your information.

This policy applies to all clients, prospective clients, suppliers, employees, service providers, and other third parties whose personal information we collect, use, store, and process. The policy is aligned with the Protection of Personal Information Act, No. 4 of 2013 ("POPIA"), the Financial Intelligence Centre Act ("FICA"), and other applicable laws in South Africa.

2. Collection of Personal Information

We collect personal information in various ways, including but not limited to:

- Client onboarding and KYC (Know Your Customer) documentation;
- Submission of service requests, applications, or queries;
- Use of our website and online forms;
- Telephonic, email, or in-person communication with our representatives;
- Publicly available sources and regulatory databases.

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Examples of personal information collected:

- Full names, date of birth, identity/passport numbers;
- Residential, postal, and email addresses;
- Contact numbers (mobile and landline);
- Employment and income information;
- Marital status and dependents (where required);
- Banking details and tax numbers;
- Financial history and creditworthiness data;
- Copies of FICA verification documents (e.g., ID, utility bill, bank statements).

We collect personal information:

- To comply with the FAIS Act, FICA, and other legal obligations;
- To provide appropriate financial advice and intermediary services;
- To establish and verify identity and suitability of financial products and services.

3. Use of Personal Information

Elysian processes personal information only for specific, explicitly defined, and lawful purposes. These purposes include, but are not limited to:

- Underwriting and risk assessment: Ensuring that the financial products offered are appropriate to the client's risk profile;
- Claims processing: Administering, validating, and settling insurance or investment claims:
- Credit checks and verification: Conducting background checks, verifying financial standing, and managing credit risk;
- **Identity verification**: Confirming personal and business identity against reliable sources and verifying documentation;
- **Compliance and record-keeping**: Ensuring adherence to legal obligations (e.g., FICA reporting, FSCA compliance);
- Fraud and crime prevention: Identifying and mitigating fraudulent activities, money laundering, and financing of terrorism;
- Market research: Conducting client satisfaction surveys and analysis to improve our products and services;
- Legal and regulatory proceedings: Supporting investigations, litigation, or audits;
- **Product suitability and advice**: Ensuring recommendations are based on accurate and upto-date client information:
- Client communication: Keeping clients informed of relevant updates, changes, or opportunities.

Retention: Personal information will be retained for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory, and internal policy requirements. Archived records will be secured in a manner consistent with industry best practice.

Non-disclosure: Elysian will not sell, rent, or trade personal information to third parties. Information will only be disclosed:

- With the client's written consent;
- When required by law, subpoena, or court order;
- To fulfil a legal obligation or protect the company's legal interests;
- In the event of corporate restructuring or business transfer (with safeguards in place).

4. Protection and Security of Information

Elysian implements technical, physical, and administrative safeguards to protect personal information from loss, misuse, unauthorised access, disclosure, alteration, or destruction. These include:

- Encryption of electronic data;
- Firewall and intrusion detection systems;
- Password-protected user access to confidential files;
- Multi-factor authentication (MFA) for key systems;

- **Restricted access** to data based on role/responsibility;
- Secure disposal of physical and digital records when no longer required.

Third-Party Service Providers: We may contract with trusted service providers (e.g., IT support, cloud services, compliance consultants) who may have limited access to personal information. These providers are contractually bound through Service Level Agreements (SLAs) to maintain strict confidentiality, implement adequate security, and process information only on our instructions.

Employee Confidentiality: All employees are required to:

- Sign employment agreements containing strict confidentiality clauses;
- Complete mandatory privacy and POPIA training;
- Immediately report any suspected data breaches or privacy violations.

Conditions for Lawful Disclosure: We may disclose information only when:

- Required by the Financial Intelligence Centre, SARS, FSCA, or law enforcement;
- In the public interest and where lawful;
- Necessary to protect Elysian's rights, clients, or the integrity of the financial system.

Accuracy and Updates: We take reasonable steps to ensure personal information is accurate, complete, and up to date. Clients are encouraged to inform us of any changes. Requests for updates, corrections, or deletion of data (where lawful) can be submitted to our Information Officer.

5. Your Rights Under POPIA

As a data subject, you have the following rights:

- Access to your personal information held by Elysian;
- Rectification of incorrect, outdated, or incomplete data;
- Erasure of personal data (subject to legal limitations);
- Objection to processing based on legitimate grounds;
- Lodging a complaint with the Information Regulator where rights have been infringed.

To exercise these rights, you may submit a request in writing to our Information Officer. Verification of identity will be required.

6. Contact Information

For any queries, requests, or complaints regarding this policy or the handling of personal information, please contact:

Information Officer: Tregue Minnar

Physical Address: [OFFICE 12 1ST FLOOR, WESTWAY OFFICE PARK, 18 THE

BOULEVARD WESTVILLE, KWA-ZULU NATAL, 3630]

Email Address: support@elysianwp.com

Website: www.elysianwp.com

7. Policy Review

This policy will be reviewed annually or as required by changes in legislation, business operations, or identified risks. Any updates will be communicated to affected data subjects.